

Submitted by: **Conduent State Healthcare, LLC**

CONDUENT

**Response to Request for Proposal**

# Medicaid Drug Rebate System (MDR)

## for the State of Nebraska, Department of Health and Human Services (DHHS)

Due Date: **August 6, 2026** | RFP Number: **124528 ON**

Portions of this proposal contain proprietary information, ideas, know-how, concepts, processes, and trade secrets that are the sole property of Conduent. Pages containing proprietary content are designated in the footer as "PROPRIETARY INFORMATION" and the specific content is identified with a light orange background, when only portions of the page are protected. If the entire page is considered Proprietary, the footer will read "This entire page PROPRIETARY INFORMATION." The proprietary contents of this proposal are intended solely for use in the procurement process and may not be disclosed except to persons who are involved in the evaluation of the proposal or award of the contract. The contents may not be duplicated, used, or disclosed in whole or in part for any purpose except the procurement process. Release of Conduent proprietary, confidential, and trade secret information would place Conduent at a serious and irreparable competitive disadvantage in future procurements by providing competitors with information that Conduent maintains strictly confidential and which is unavailable to any third-party except under restrictions contained in a nondisclosure agreement or protections that cover this information under applicable law. If a third-party makes a request for disclosure of any of the contents of this proposal, please notify Conduent immediately so that Conduent will have an opportunity to provide assistance in protecting the proprietary contents of this proposal from unauthorized disclosure.

**Anna Sever**
*President*
Conduent State Healthcare, LLC

100 Campus Drive
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Florham Park, NJ 07932

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July 09, 2026

Mr. Bradley Murphy
Procurement Contracts Officer
Nebraska Department of Health and Human Services
bradley.murphy@nebraska.gov

RE: Medicaid Drug Rebate System (MDR) for the State of Nebraska Department of Health and Human Services, RFP # 124528 ON

Conduent State Healthcare, LLC (Conduent) is pleased to submit this proposal in response to Solicitation Number 124528 ON. The solicitation was issued by the Nebraska Department of Health and Human Services (DHHS) for a Medicaid Drug Rebate System (MDR). Conduent appreciates the opportunity to present our MDR Solution and implementation approach to support Nebraska's Medicaid Drug Rebate Program.

Conduent has read, understands, and meets the minimum essential qualifications, experience, and/or capabilities detailed in the RFP. We bring extensive experience supporting state Medicaid programs and delivering technology solutions that improve operational efficiency, compliance, reporting, and program oversight. Table 1 details these qualifications and experience for DHHS.

**Table 1. Conduent Exceeds DHHS Minimum Qualifications for Evaluation**

| DHHS Minimum Qualifications for Evaluation |
|---|
| **1. Bidder shall provide evidence of a minimum of ten (10) years' experience in the design, testing, data/file conversion and migration, operational readiness and certification of a Drug Rebate System similar to the scope of this RFP.** |
| Conduent has provided rebate administration services to state Medicaid programs for 27 years. Our CMdS Rebate Administration solution was developed specifically for the Medicaid Drug Rebate Program (MDRP). Conduent brings 34 years of PBM,<br>35 years of pharmacy audit, and 52 years of government-sponsored healthcare experience, with a primary focus on Medicaid. We have a perfect record. Since we began supporting states with their drug rebate program needs in 1999, we have never failed to meet a CMS-required deadline. |
| **2. Bidder shall provide a minimum list of three clients utilizing similar operations and customer support requirements of a Drug Rebate System similar to the scope of this RFP.** |
| We currently support Medicaid drug rebate programs in Massachusetts, the District of Columbia, Hawaii, Maryland, Minnesota, Montana, New Mexico, North Dakota, and Washington. We provide additional detail on four of these projects below.<br>1. **Massachusetts Executive Office of Health and Human Services (EOHHS)** since 2001, spanning four contracts, to provide PBM technology and services. Our Boston staff has forged a 25-year collaborative partnership with business, technical, and clinical staff from EOHHS and the University of Massachusetts (UMASS) Medical School. This partnership has a proven track record of success starting with the implementation of our POS and rebate services followed by the implementation of our automated PA solution. |

| DHHS Minimum Qualifications for Evaluation |
| --- |
| **Federal Drug Rebate Administration.** Conduent currently supports full rebate cycle activities for the Massachusetts Medicaid program using Conduent's Drug Rebate and Analysis Management System (DRAMS) both for prescription (claims submitted through a pharmacy) and for physician-administered drugs, including innovative and non-innovative drugs. Conduent also process claims from Managed Care Organizations for Drug Rebate. Conduent also provides RebateWeb, a proprietary Internet-based product that allows participating manufacturers to receive invoices over the Internet.<br><br>**State Supplemental Drug Rebate Administration.** From July 2005, Conduent has fully supported the Massachusetts Medicaid State supplemental rebate program pertaining to short-term, year-to-year agreements with drug manufacturers regarding specific pharmaceutical products using unit rebate amount (URA) calculation methods. Starting in 2021, Conduent has managed the states Value Based Contracting Rebate Program. Conduent also supported the medical supply rebate program. (Please note that Conduent currently supports supplemental rebate covering diabetic supplies as well as VBC.) |
| 2. Conduent is currently fulfilling a fifth consecutive contract with the **Hawaii Department of Human Services, Med-QUEST Division**. We have provided fiscal agent operations (since 2002) and pharmacy benefits management services (since 2001) for the State's Medicaid Program. Across our nearly 20-year tenure in Hawaii, we have developed a detailed knowledge and understanding of the unique complexities of the State's healthcare programs. For PBM, Conduent uses our proprietary Conduent Medicaid Suite (CMdS) pharmacy solution for pharmacy claims processing and our **CMdS-Rebate Administration solution for drug rebate administration**. |
| 3. Conduent has provided technology and operations services for the **Montana Medicaid program** since 1984. We currently represent six contracts across a 42-year partnership with our Montana client. We implemented Conduent-developed MMIS and POS systems and have provided PBM services as part of our MMIS/FA contract since 1996. We currently hold two separate contracts with Montana: one for MMIS/FA and one for PBM services. Under our current stand-alone PBM contract awarded in 2012, Conduent implemented our modular pharmacy suite for POS processing, automated PA, and **drug rebate administration** according to schedule. As part of the implementation process, Montana and Conduent made history by becoming the first in the nation to earn CMS certification under the modularity standards. |
| 4. Conduent has provided PBM, MMIS, and FA services for the **New Mexico Human Services Department (HSD)** as a prime vendor since 1994, representing three consecutive contract awards. Our first contract included takeover of the MMIS, call center, provider and client services, mail room, system maintenance and operations, and many other services. Since that time, we have continually assumed more responsibilities. We developed and implemented our MMIS and PBM solutions on schedule and became the Fiscal Management Agent (FMA) for New Mexico's Mi Via self-directed waiver program for long-term care services. We also implemented our State Level Registry (SLR) system. In addition, we completed several major projects on time and within budget, including the T-MSIS project (2018), the transition of the Client Services Center (CSC) from the New Mexico Human Services Department (2018), and the rollout of Centennial Care 2.0, the State's managed care program (2018). In 2020, HSD awarded Conduent a new Medicaid Enterprise Financial Services (FS) contract for the implementation and maintenance of our **Conduent Medicaid Suite (CMdS) modules.** These modules support comprehensive financial services, claims processing, Self-Directed Home and Community Based Services, PBM, **drug rebate administration**, data exchange and reporting, and general requirements. |
| **3. Bidder shall confirm that all data, systems, and environments associated with this RFP will be located, stored, and managed within the United States. No data shall be transferred, processed, or stored outside the U.S. jurisdiction.** |
| Conduent confirms that all data, systems, and environments associated with this RFP will be located, stored, and managed within the United States. We understand that no data shall be transferred, processed, or stored outside the US jurisdiction. |
| **4. Bidder shall provide evidence of at least one (1) project that achieved CMS certification within the last ten (10) years.** |
| Conduent follows a proven, documented approach to achieving CMS certification. Unlike other vendors, CMS certification is not a learning curve for Conduent. We understand the importance of the certification process and protect your access to claim the maximum available federal matching funds. We deliver CMS Certification Success unmatched in the industry.<br><br>Conduent's PBM solution achieved **full CMS certification in Washington in 2025**. Our PBM and Point of Sale (POS) solution for **Maryland met the CMS Medicaid Enterprise Certification Toolkit (MECT) in early 2024.**<br><br>Our solution also received **CMS certification in North Dakota in May 2019** as part of our Medicaid Management Information System (MMIS). Certification allowed North Dakota to claim the maximum federal reimbursement amount of 75 percent for costs associated with the operation of the system going back to October 2015, the date the system began processing and paying Medicaid claims. |

| DHHS Minimum Qualifications for Evaluation |
| --- |
| In fact, this same solution received **CMS certification in Montana in 2017** retroactive to our go-live date. This was a historic achievement, making Conduent the first vendor to earn CMS certification for a Medicaid pharmacy POS module based on federal checklists for modularity standards. CMS praised our certification response to Medicaid Enterprise Certification Toolkit (MECT) protocols as being "best practice." |

Our MDR Solution for DHHS, Conduent's CMdS Rebate, is designed specifically to support Medicaid drug rebate administration and provides a modern, secure, and configurable platform to support federal and state rebate program requirements. The MDR Solution is a cloud-based Software-as-a-Service platform hosted within the United States. The solution supports program administration, rebate invoicing, dispute management, reporting, analytics, auditability, security, and interoperability with external systems. Conduent's implementation methodology includes project management, data conversion, testing, training, operational readiness, and CMS certification support.

We understand the importance of this modernization initiative and are committed to partnering with DHHS throughout implementation, certification, and ongoing operations. Our team offers experience supporting Medicaid programs, managing large-scale system implementations, and meeting regulatory and operational requirements.

Per the solicitation instructions, Conduent has included all required proposal components and attachments. These include completed responses for the technical requirements, functional requirements, cost proposal, and supporting documentation.

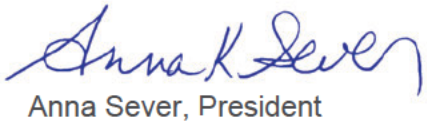
Per the RFP instructions, we are providing the following documents with our response:

- Original Contractual Agreement Form
- Corporate Overview
- Sections II through IV
- Technical Response
- Attachment A – MDR Functional Requirements
- Attachment B – MDR Technical Requirements
- Addendum A – Data Use Agreement (DUA) Provisions
- Appendix 1 – Subcontractor Agreement Form (signed manually in ink or via DocuSign)
- Completed Cost Sheet

Conduent is fully committed to working with the State of Nebraska. Please do not hesitate to contact me directly, or John (J.P.) Crouse, our account representative, at john.crouse@conduent.com, or 303-887-6957 if you have any questions.

Thank you for your time and consideration.

Sincerely,



Anna Sever, President

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# VI.A.1 Corporate Overview [RFP VI.A.1]

**REQUIREMENT: RFP Section VI.A.1**

The bidder should provide the full company or corporate name, address of the company's headquarters, entity organization (corporation, partnership, proprietorship), state in which the bidder is incorporated or otherwise organized to do business, year in which the bidder first organized to do business and whether the name and form of organization has changed since first organized.:

## VI.A.1.a Bidder Identification and Information [RFP VI.A.1.a]

**REQUIREMENT: RFP Section VI.A.1.a**

The bidder should provide the full company or corporate name, address of the company's headquarters, entity organization (corporation, partnership, proprietorship), state in which the bidder is incorporated or otherwise organized to do business, year in which the bidder first organized to do business and whether the name and form of organization has changed since first organized.

Table VI.A.1.a-1, following, provides Conduent's corporate overview in an easy to reference format.

**Table VI.A.1.a-1. Corporate Vital Statistics**

| Requirement | Response |
|---|---|
| Full company or corporate name | Conduent State Healthcare, LLC |
| Address of company headquarters | 100 Campus Drive, Suite 200<br>Florham Park, NJ 07932 |
| Entity organization | Limited Liability Company |
| State in which the bidder is incorporated or otherwise organized to do business | Delaware |
| Year in which the bidder first organized to do business | 1999 |
| Whether the name and form of organization has changed since first organized | Yes, Conduent State Healthcare, LLC's predecessor company – Consultec ,Inc. – a Georgia corporation was formed in June 1970 and merged into Consultec, LLC, a limited liability company established in Delaware in March 1999. Consultec, LLC, went through multiple administrative name changes and is now known as Conduent State Healthcare, LLC. |

# VI.A.1.b Financial Statements [RFP VI.A.1.b]

**REQUIREMENT: RFP Section VI.A.1.b**

The bidder should provide financial statements applicable to the firm. If publicly held, the bidder should provide a copy of the corporation's most recent audited financial reports and statements, and the name, address, and telephone number of the fiscally responsible representative of the bidder's financial or banking organization.

If the bidder is not a publicly held corporation, either the reports and statements required of a publicly held corporation, or a description of the organization, including size, longevity, client base, areas of specialization and expertise, and any other pertinent information, should be submitted in such a manner that solicitation evaluators may reasonably formulate a determination about the stability and financial strength of the organization. Additionally, a non-publicly held firm should provide a banking reference.

The bidder must disclose any and all judgments, pending or expected litigation, or other real or potential financial reversals, which might materially affect the viability or stability of the organization, or state that no such condition is known to exist.

The State may elect to use a third party to conduct credit checks as part of the corporate overview evaluation.

As a subsidiary, Conduent State Healthcare, LLC does not maintain separately audited financial statements. Accordingly, in satisfaction of this requirement, Conduent Incorporated, the parent company, provides its most recent audited financial reports and statements. The attached Annual Report on Form 10-K for the fiscal year ended December 31, 2025, follows this page and includes the independent auditor's report and audited consolidated financial statements of Conduent Incorporated.

Conduent does not believe that any judgments, pending or expected litigation, or other real or potential financial reversal, would have a material adverse effect on our company’s financial condition or our ability to carry out the proposed contract if awarded. Further information with regard to material legal proceedings involving Conduent may be found in the periodic disclosures to the Securities and Exchange Commission under Forms 10-K and 10-Q filed by our ultimate parent company, Conduent Incorporated, which are hereby incorporated into this disclosure.

The fiscally responsible representative is:

Anna Sever
President, Government Solutions
100 Campus Drive
Suite 200
Florham Park, New Jersey 07932
724-217-6423

# UNITED STATES
# SECURITIES AND EXCHANGE COMMISSION
**Washington, D.C. 20549**

# FORM 10-K

**(Mark One)**

☒ **ANNUAL REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934**

**For the fiscal year ended: December 31, 2025**

☐ **TRANSITION REPORT PURSUANT TO SECTION 13 OR 15(d) OF THE SECURITIES EXCHANGE ACT OF 1934**

**For the transition period from: _____ to: _____**

**Commission File Number 001-37817**

# CONDUENT INCORPORATED

(Exact Name of Registrant as specified in its charter)

| **New York** | **81-2983623** |
|---|---|
| (State or other jurisdiction of incorporation or organization) | (IRS Employer Identification No ) |
| **100 Campus Drive, Suite 200, Florham Park, New Jersey** | **07932** |
| (Address of principal executive offices) | (Zip Code) |

**(844) 663-2638**
**(Registrant's telephone number, including area code)**

**Securities registered pursuant to Section 12(b) of the Act:**

| Title of each class | Trading Symbol(s) | Name of each exchange on which registered |
|---|---|---|
| **Common Stock, $0.01 par value** | **CNDT** | **NASDAQ Global Select Market** |

**Securities registered pursuant to Section 12(g) of the Act: None**

Indicate by check mark if the registrant is a well-known seasoned issuer, as defined in Rule 405 of the Securities Act. Yes ☐ No ☒

Indicate by check mark if the registrant is not required to file reports pursuant to Section 13 or Section 15(d) of the Act. Yes ☐ No ☒

Indicate by check mark whether the registrant (1) has filed all reports required to be filed by Section 13 or 15(d) of the Securities Exchange Act of 1934 during the preceding 12 months (or for such shorter period that the registrant was required to file such reports), and (2) has been subject to such filing requirements for the past 90 days. Yes ☒ No ☐

Indicate by check mark whether the registrant has submitted electronically every Interactive Data File required to be submitted pursuant to Rule 405 of Regulation S-T during the preceding 12 months (or for such shorter period that the registrant was required to submit such files). Yes ☒ No ☐

Indicate by a check mark whether the registrant is a large accelerated filer, an accelerated filer, a non-accelerated filer, a smaller reporting company or an emerging growth company. See definitions of "large accelerated filer," "accelerated filer," "smaller reporting company" and "emerging growth company" in Rule 12b-2 of the Exchange Act.

| Large accelerated filer | ☐ | Accelerated filer | ☒ | Non-accelerated filer | ☐ | Small reporting company | ☐ | Emerging growth company | ☐ |
|---|---|---|---|---|---|---|---|---|---|

If an emerging growth company, indicate by check mark if the registrant has elected not to use the extended transition period for complying with any new or revised financial accounting standards provided pursuant to Section 13(a) of the Exchange Act. ☐

Indicate by check mark whether the registrant has filed a report on and attestation to its management's assessment of the effectiveness of its internal control over financial reporting under Section 404(b) of the Sarbanes-Oxley Act (15 U.S.C. 7262(b)) by the registered public accounting firm that prepared or issued its audit report. ☒

If securities are registered pursuant to Section 12(b) of the Act, indicate by check mark whether the financial statements of the registrant included in the filing reflect the correction of an error to previously issued financial statements. ☐

Indicate by check mark whether any of those error corrections are restatements that required a recovery analysis of incentive- based compensation received by any of the registrant's executive officers during the relevant recovery period pursuant to §240.10D-1(b). ☐

Indicate by a check mark whether the registrant is a shell company (as defined in Rule 12b-2 of the Exchange Act). Yes ☐ No ☒

The aggregate market value of the voting and non-voting common stock of the registrant held by non-affiliates as of June 30, 2025 was $411,512,508.

Indicate the number of shares outstanding of each of the Registrant's classes of common stock, as of the latest practicable date:

| Class | Outstanding at January 31, 2026 |
|---|---|
| Common Stock, $0.01 par value | 154,709,174 |

**DOCUMENTS INCORPORATED BY REFERENCE**

Part III of this Form 10-K incorporates by reference certain portions of the Registrant's Notice of 2026 Annual Meeting of Shareholders and Proxy Statement (to be filed with the Securities and Exchange Commission pursuant to Regulation 14A no later than 120 days after the close of the fiscal year covered by this report on Form 10-K).

## FORWARD-LOOKING STATEMENTS

From time to time, we and our representatives may provide information, whether orally or in writing, including certain statements in this Annual Report on Form 10-K (the "Form 10-K"), and in any exhibits to this Form 10-K, which are deemed to be "forward-looking" as defined in the Private Securities Litigation Reform Act of 1995 (the "Litigation Reform Act"). These forward-looking statements and other information are based on our beliefs as well as assumptions made by us using information currently available.

The words “anticipate,” “believe,” “estimate,” “expect,” "plan," “intend,” “will,” "aim," “should,” "could," "forecast," "target," "may," "continue to," "endeavor," "if," "growing," "projected," "potential," "likely," "see ahead," "further," "going forward," "on the horizon" and similar expressions (including the negative and plural forms of such words and phrases), as they relate to us, are intended to identify forward-looking statements, but the absence of these words does not mean that a statement is not forward-looking. These statements reflect our current views with respect to future events and are subject to certain risks, uncertainties and assumptions, many of which are outside of our control, that could cause actual results to differ materially from those expected or implied by such forward-looking statements and could materially adversely affect our business, financial condition, results of operations, cash flows and liquidity.

Important factors and uncertainties that could cause our actual results to differ materially from those in our forward-looking statements include, but are not limited to: governments appropriations and termination rights contained in our government contracts; the competitiveness of the markets in which we operate and our ability to renew commercial and government contracts, including contracts awarded through competitive bidding processes; our ability to recover capital and other investments in connection with our contracts; the impact of geopolitical events and geopolitical tensions (such as the war in the Ukraine and conflict in the Middle East), macroeconomic conditions, natural disasters and other factors in a particular country or region on our workforce, customers and vendors; our reliance on third-party providers; our ability to deliver on our contractual obligations properly and on time; changes in continued interest in outsourced business process services; the adverse effect of claims of infringement of third-party intellectual property rights; our ability to estimate the scope of work or the costs of performance in our contracts; the loss of key senior management and our ability to attract and retain necessary technical personnel and qualified subcontractors; our failure to develop new service offerings and protect our intellectual property rights; our ability to modernize our information technology infrastructure and consolidate data centers; expectations relating to environmental, social and governance considerations; utilization of our stock repurchase program; the effects related to our use of artificial intelligence ("AI") on our business; the failure to comply with laws relating to individually identifiable information and personal health information; the failure to comply with laws relating to processing certain financial transactions, including payment card transactions and debit or credit card transactions; breaches of our information systems or security systems or any service interruptions; risks related to hacking or other cybersecurity threats to our data systems, information systems and network infrastructure and other service interruptions, including relating to the previously disclosed cyber event that took place in January 2025 (the "January 2025 Cyber Event"), including our investigation of such incident and mitigation and remediation efforts, the nature and extent of such incident, the potential disruption to our business or operations, the potential impact on our reputation, and our assessments of the likely financial and operational impacts of such incident; our ability to comply with data security standards; developments in various contingent liabilities that are not reflected on our balance sheet, including those arising as a result of being involved in a variety of claims, lawsuits, investigations and proceedings; risks related to divestiture transactions, including but not limited to the Company’s ability to realize the benefits anticipated from such transactions, and unexpected costs or liabilities in connection with such transactions; the impact of potential goodwill and other asset impairments on our results of operations; our significant indebtedness and the terms of such indebtedness; our failure to obtain or maintain a satisfactory credit rating and financial performance; our ability to obtain adequate pricing for our services and to improve our cost structure; our ability to collect our receivables, including those for unbilled services; a decline in revenues from, or a loss of, or a reduction in business from or failure of significant clients; fluctuations in our non-recurring revenue; increases in the cost of voice and data services or significant interruptions in such services; our ability to receive dividends and other payments from our subsidiaries; and other factors that are set forth in the “Risk Factors” section, the “Legal Proceedings” section, the “Management's Discussion and Analysis of Financial Condition and Results of Operations” section and other sections of this Form 10-K, as well as in our Quarterly Reports on Form 10-Q and Current Reports on Form 8-K filed with the Securities and Exchange Commission (the "SEC"). Any forward-looking statements made by us speak only as of the date on which they are made. We are under no obligation to, and expressly disclaim any obligation to, update or alter our forward-looking statements, whether because of new information, subsequent events or otherwise, except as required by law.

# CONDUENT INCORPORATED
# FORM 10-K
**December 31, 2025**

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# PART I

## ITEM 1. BUSINESS

In this Form 10-K, unless the content otherwise dictates, "Conduent", the "Company", "we" or "our" mean Conduent Incorporated and its consolidated subsidiaries.

### Our Business

We deliver digital business solutions and services spanning the commercial, government and transportation spectrum – creating valuable outcomes for our clients and the millions of people who count on them. We leverage cloud computing, artificial intelligence ("AI"), machine learning, automation and advanced analytics to deliver mission-critical solutions. Through a dedicated global team of approximately 51,000 associates, process expertise and advanced technologies, our solutions and services digitally transform our clients' operations to enhance customer experiences, improve performance, increase efficiencies and reduce costs.

Conduent is a diverse, global company with a portfolio of assets spanning both the commercial and public sectors. Our unique set of solutions and services are utilized by some of the largest corporations, governments and public sector agencies across multiple industries and geographies to deliver end-user excellence at scale and business process efficiencies with state-of-the-art, proprietary technology. Each day, our solutions and services interact in the lives of millions of people in many ways - from safer, more seamless commutes with reduced congestion to streamlined benefits enrollment, documents management, customer experiences and government healthcare claims. Conduent's uniqueness, loyalty and dedication to service make for a future of robust value creation and growth.

Our commercial portfolio includes technology-led solutions driving efficiencies and enhanced end-user experiences across multiple industries in attractive growth markets, including customer experience management, finance and accounting, digital and document solutions, banking, healthcare and human capital solutions. In the commercial market, competitive pressures are driving demand for increased productivity, efficiency and modern digital experiences, and these needs favor end-to-end solutions and outsourcing where we have an advantage. In addition, increasing globalization and the proliferation of AI-enabled solutions and applications create opportunities we are poised to capitalize on. Our people, process expertise and technology elevate client outcomes every day. In 2025, we managed approximately 2 billion customer service interactions, captured and classified over 14 billion documents and claims, and supported millions of employees with human resource ("HR") services.

We serve a substantial portion of the public sector, providing market-leading government and transportation offerings that streamline enrollment and automate claims for government-funded programs such as Medicaid, accurately deliver benefits payments that residents depend on every day, and seamlessly move travelers.

Our government portfolio includes government healthcare, eligibility and enrollment solutions, digital payments and child support payments, ensuring efficient Medicaid healthcare claims processing and delivery of benefits to the most vulnerable populations while reducing the risk of fraud. Our solutions help state agencies determine eligibility, streamline enrollment, adjudicate claims and meet requirements for government-funded healthcare programs. We also deliver government-distributed payments seamlessly and securely utilizing our proprietary software and expertise. In 2025, we processed over 454 million Medicaid claims and disbursed approximately $80 billion in government benefit payments.

Our transportation portfolio includes public transit and road usage charging solutions that streamline operations, increase revenue and reduce congestion while enabling safer, more seamless travel with reduced environmental impact. We help transportation agencies collect payments, manage operations, equipment and servicing, reduce traffic congestion and enable digital transactions for transit and road usage charging globally, processing over 14 million tolling transactions every day.

With approximately 51,000 associates globally as of December 31, 2025, we are dedicated to our clients' success. Each day, our people and our digital business solutions and services serve millions of end users on behalf of our clients.

Of our global team, approximately 34% is located in North America with the remainder located primarily in our delivery centers in Asia Pacific, Latin America, the Caribbean and Europe. We continue to be recognized for our commitment to fostering a culture of belonging and inclusion.

## Our Strategic Focus

Our aim is to be the technology-led business solutions partner of choice for businesses and governments globally. To achieve this, we focus on delivering outcomes across three critical dimensions: Growth, Efficiency and Quality. Our strategy is designed to deliver shareholder value by creating profitable growth, expanding operating margins, identifying process efficiencies and employing a disciplined capital allocation strategy.

We have identified specific execution strategies and key performance indicators across Growth, Efficiency and Quality.

**Growth**: Our opportunity for growth stems from understanding our clients' businesses and driving valuable outcomes to help them reduce costs, improve efficiencies and elevate customer experiences. To capitalize on growth opportunities, we remain focused on several key strategies:

- **Sales Performance Optimization**: We continue to optimize sales training, talent, go-to-market processes and account management to strengthen client and prospect relationships to gain more selling opportunities with new clients as well as greater share of wallet with existing clients. Our team's talent and dedication has resulted in Conduent serving 46 states, nearly half of the Fortune 100 companies and other leading companies, including:
    - 9 of the top 10 U.S. health insurers;
    - 7 of the top 10 pharma companies;
    - 4 of the top 5 automakers; and
    - 7 of the top 10 U.S. banks.
- **Offering Development**: We continue to augment our portfolio of services and solutions with innovative technology capabilities, including cloud, data analytics, automation tools, generative AI ("GenAI")/ AI, digital payments and machine learning capabilities to create differentiated, high-value solutions for our clients, operate efficiently and enable greater penetration of attractive market segments.

In 2025, our existing clients renewed contracts with us and gave us more business in adjacent service lines and we also gained new clients. We measure success in "Growth" through revenue retention, our net Annual Recurring Revenue ("ARR") activity metric and new business signings, among other metrics.

**Efficiency**: We continue to identify ways to reduce costs and create new efficiencies. We have simplified and standardized our operating model by removing redundant management layers and applying processes that enable faster decision-making and greater transparency and accountability. In addition, we aim to achieve additional efficiencies through the following strategies:

- **AI and Automation**: We will continue to invest in embedding GenAI/AI and intelligent process automation into existing operations, including automated document management, fraud detection and prevention, claims adjudication and customer experience. Our automation capabilities increase productivity through advanced data extraction and handling of structured and unstructured data, improve workflow efficiency through business rules and task automation and increase operational accuracy through predictive analytics. In 2025, we continued a dedicated GenAI program with over 20 prioritized use cases to help drive quality, efficiency and faster cycle times in our clients' operations, as well as continued our GenAI innovation initiative with Microsoft. In addition, we launched our AI Experience Center in our Florham Park, NJ headquarters to immerse our clients in AI innovations and demonstrate these solutions in production.
- **Delivery Optimization**: We continue to operate more efficiently through common processes with a shared services model that enables economies of scale and creates greater accountability for client performance. We drive progress through continuous process improvement and capitalizing on a range of staffing models, including flexible work from home and hybrid work, as well as optimizing our geographic footprint.

We continue to respond with agility to clients' shifting needs as reflected in our Net Promoter Score ("NPS"), which has increased significantly since becoming Conduent in 2017. We measure success in Efficiency through associate retention and adjusted earnings before interest, taxes, depreciation and amortization ("Adjusted EBITDA") margin, among other metrics.

**Quality**: Our clients depend on stable, high-quality service delivery. We continue to drive progress by increasing system uptime, improving operational stability and creating client confidence and satisfaction by focusing on the following strategies:

- **Proactive, Real-time Monitoring of Applications and Service Performance**: We continue to invest in AI and machine learning technologies to proactively monitor and prevent incidents.
- **Data Center Optimization**: We have systematically consolidated the majority of our technology infrastructure into two primary data centers, leading to increased processing speeds, redundancy and stability, as well as improved performance for our clients.
- **Improve End-User Experience**: We are enhancing both user interfaces and experiences across our offerings by expanding self-service tools, AI-powered capabilities and mobile apps and by leveraging deeper user insights through analytics.

Our focus on quality has resulted in continued client confidence and satisfaction. We measure “Quality” by service level agreement performance, system availability, technology incident rates and client satisfaction.

**Investment Strategy**: We maintain a balanced and disciplined approach to capital allocation including debt repayment, shareholder returns and internal investments. Our internal investments to support our business goals and client needs fall into three broad categories:

- Opportunities to optimize, where we have significant scale and where we believe that with process improvements, automation and investment into the current offerings, we can improve the end-user experience, reduce our cost of delivery, expand our margins and further capture additional share.
- Opportunities to enhance, where we have strong client relationships, a long history of expertise in that market and legacy technology that needs to be refreshed or modernized.
- Opportunities to expand, where we believe we can compete successfully, and we see the return on investment as more significant than in other businesses. These businesses, augmented with new capabilities and geographic expansion, will address market dynamics and provide additional growth opportunities.

## Our Market Opportunity

We operate in markets with compelling growth opportunities, including Business Process as a Service, transportation, payments and customer experience management, as well as in many industries, including healthcare and financial services. We estimate our addressable market size in the global business process services industry to be $219 billion in 2025, according to third-party industry reports. Many industry analysts and advisors place us as a leader across several segments in this large, diverse and growing market.

Ongoing competitive pressures and increasing demand for further productivity gains have motivated businesses and government organizations to outsource elements of their day-to-day operations to accelerate performance and improve end-user experience. As a result, our clients have become more focused on their core businesses and the range of outsourced activities has expanded. Increasing globalization has also required many companies to optimize cost structures and engage in AI-enabled business process solutions to retain competitiveness.

Conduent is unique in that we have solutions that span the end-to-end value chains of our clients. This means that our clients can partner with us to support more of their business processes than other providers. We are recognized by independent industry analysts as leaders for many of these solutions.

- **Industry Analyst Accolades:**
  - Nelson Hall Benefits Administration: Health & Welfare 2025 NEAT Leader - Marketplace Focus
  - Nelson Hall Healthcare Payer Agility & Innovation 2025 NEAT Leader - Overall
  - Nelson Hall Experience-Led HR Transformation 2025 NEAT Leader - Experience and Engagement Focus

- **Market Position:**
  - Everest Group BPS Top 10 2025 - #9
  - Gartner Market Share IT Services 2025 - BPO, Worldwide - #14

## Segments

We organize, manage and report our business through three reportable segments:

*Commercial:* Our Commercial segment provides business process services that span our clients' business processes end-to-end from the front-office to the back-office for a variety of commercial industries. These solutions are both cross-industry and industry-specific in nature. Across the Commercial segment, we operate on our clients' behalf to deliver mission-critical solutions and services to reduce costs, improve efficiencies and enable revenue growth for our clients, and deliver better experiences for their consumers and employees. Our Commercial segment is our largest segment, with segment revenue for 2025 of $1,511 million, representing 49.7% of our total revenues excluding divestitures.

*Government:* Our Government segment provides government-centric services and solutions to U.S. federal, state, local and foreign governments for public assistance, healthcare program administration, transaction processing, eligibility and enrollment processing, payment services and case management. In this segment, we help governments respond to changing rules for eligibility and keep pace with increasing citizen expectations, modernize legacy technology systems, combat benefits fraud and adapt to an evolving regulatory environment. Our Government segment revenue for 2025 was $922 million, representing 30.3% of our total revenues excluding divestitures.

*Transportation:* Our Transportation segment provides government agencies and transportation authorities around the world with systems, support and revenue-generating solutions serving toll and fare collections as well as mobility and digital payments that help streamline operations and increase revenue to government and transportation agencies. With an expanded focus on sustainability and enhancing the quality of life for citizens and communities around the world, our solutions help reduce congestion and greenhouse emissions, while creating seamless travel experiences for consumers throughout transportation ecosystems. Transportation segment revenue for 2025 was $609 million, representing 20.0% of our total revenues excluding divestitures.

We present segment financial information in Note 3 – Segment Reporting to our Consolidated Financial Statements included in Part II, Item 8 of this Form 10-K.

## Our Service Offerings

***Commercial***

Our technology-led solutions and services include Customer Experience Management ("CXM"), Business Process as a Service ("BPaaS") and Integrated Digital Solutions ("IDS").

- **Customer Experience Management**
  - We deliver a full range of customer contact services, including customer care, technical support, loyalty management, and outbound and inbound sales, handling many complex interactions and representing the brands of our clients. We create better experiences across the customer lifecycle through a variety of channels including chat, email, voice and virtual agents to help customers where and how they want to engage. Through omni-channel communications, automation and analytics, as well as labor efficiencies, we help our clients drive revenue growth, enable scale, and gain cost reductions and other operational efficiencies. We serve marquee clients across multiple sectors, including the financial services, healthcare and life sciences, logistics, technology, telecom, travel and hospitality sectors, helping to resolve complex issues for our customers with empathy and effectiveness. The CXM business generally generates income on a per call, per agent, or per percentage of sales made basis.
- **Business Process as a Service**
  - We help our clients digitally transform business processes and drive efficiency, automation and scale across essential business functions. We streamline client operations through our deep industry experience, understanding of our clients' needs and the latest technology solutions to reduce costs,

improve security, performance and accuracy, and enable revenue growth, while enhancing the end-user experience. Our portfolio of BPaaS solutions spans payment integrity, finance, accounting, and procurement, human capital, legal and compliance, and bank and lending. We generate revenue in a variety of ways within this business, including per employee covered, contingency fees on recoveries, per agent or per hour.

- **Integrated Digital Solutions**
  - We drive efficiencies for clients with more digitized processes across the customer and document lifecycle through automation, data analytics and AI-powered solutions. This helps to shorten decision-making times on items like claims and applications while also lowering costs, reducing manual effort, improving data accuracy, providing omnichannel communications and enhancing the overall customer experience. Our solutions span document and claims processing, health plan administration, scanning and digitization of mailrooms, data and documents, and omnichannel digital and physical communications, including print and mail and solutions focused specifically in the healthcare and banking industries. We generate revenue in a variety of ways within this business, including per image scanned, per document mailed or per member covered.

***Government***

Our Government solutions and services include Government Healthcare Solutions and Government Service Solutions that streamline delivery of government benefits and programs to constituents and families in need.

- **Government Healthcare Solutions**
  - We provide program administration solutions for government healthcare programs with a range of innovative solutions such as Medicaid management, provider services, Medicaid business intelligence, pharmacy benefits management, eligibility and enrollment support, customer contact services, application processing, premium billing and case management solutions. In 2025 alone, we processed over 454 million claims. Our cloud-native Conduent Medicaid Suite ("CMdS") is a modular software as a service ("SaaS") solution for state Medicaid agencies to transform from a legacy Medicaid Management Information System ("MMIS") to a digital, interoperable and scalable Medicaid Enterprise System. Our case management and tracking solutions provide disease surveillance and outbreak management to make it easier to monitor, report and protect the health of communities globally. Both U.S. and international governments depend on our disease surveillance and outbreak case management solution to track public health metrics, vitals and birth defects, provide contact tracing and understand outbreak dynamics. These solutions help states, counties and countries optimize their costs by streamlining access to care and improving patient health outcomes through population health management, while helping families in need by improving beneficiary support. Within the Government Healthcare Solutions business, our revenue is primarily fixed fee or variable price based on a per call, per interaction or per member basis.

- **Government Service Solutions**
  - With approximately $80 billion disbursed annually, we are a leader in government payment disbursements for federally sponsored programs including benefit card programs and payment card programs. Benefit card programs are closed-loop solutions that support Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families and Women, Infants and Children ("WIC"). Payment card programs are open-loop solutions that support child support and Unemployment Insurance. Closed-loop cards are limited to specific retailers (such as Food and Nutrition Service approved retailers), while open-loop cards can be used anywhere that accepts their card network (example MasterCard or Visa). In addition, benefit card programs may only be used for specific, approved products such as food or baby formula, whereas payment card programs can be used for any type of purchase or cash benefit. We deliver electronic payments for government services in 35 states, including 21 Electronic Benefit Transfer ("EBT") programs, 13 EBT for WIC programs and 4 Electronic Childcare programs. In our closed-loop payments solution, we generate revenue based on the number of cases or number of card holders. Within our open-loop payments solution, we generate revenue based on interchange fees and spending on cards as a percentage of transactions.

- We also offer a broad set of child support services predominately to State Disbursement Units, including processing and distributing payments, child support payment cards, childcare credentialing and case management, among others, to help states comply with federal standards. Within child support solutions, the way we generate revenue varies by state, but it is generally either per financial transaction, per call, fixed price, or for development of systems.

***Transportation***

On behalf of transportation authorities around the world, we deliver solutions to facilitate toll and fare collection, congestion and fleet management, and digital payments that help streamline operations and increase revenue. With an expanded focus on sustainability and enhancing the quality of life for citizens and communities around the world, our solutions help reduce congestion and greenhouse emissions, while creating seamless experiences for travelers throughout transportation ecosystems.

- **Road Usage Charging and Management Solutions**
  - Our electronic tolling, urban congestion management and mileage-based user solutions help our clients accurately assess and collect payments millions of times every day to generate revenue for infrastructure improvements. Our solutions include vehicle passenger detection systems, electronic toll collection, automated license plate recognition and congestion management solutions. We generate revenue based on a combination of fixed fee and transaction-based pricing. The transaction-based component can be per account per month, per notice mailed, per active account, per violations fees received, or per image-based transaction.
- **Transit Solutions**
  - For train, bus, subway, metro and other transit travelers, we help make journeys more personalized and convenient while increasing fare collection for authorities and agencies. We combine fare collection, account-based ticketing and intelligent mobility to provide clients with the added efficiency of a single point of management for all transit solutions. Within transit, we primarily generate revenue via implementation of end projects (hardware and software, maintenance services, repair and sale of spare parts), and the building and operation of fare collection systems.
- **Commercial Vehicles**
  - We provide computer-aided dispatch/automatic vehicle location technology to help clients manage their fleet operations.

## Our Competitive Strengths

We possess competitive strengths that distinguish us from our competitors, including:

***Leadership in attractive growth markets:*** We are a leader in business process solutions that deliver exceptional outcomes for our clients on a massive scale. Our clients continue to outsource key business processes to improve efficiency and to accelerate performance and digital transformation. Additionally, clients are moving beyond services for back-office functions to drive customer/employee satisfaction and loyalty. Conduent has a diverse portfolio of solutions that enable business processes end-to-end across our clients' organizations. This enables them to partner with us across more of their business functions to drive efficiency and better outcomes for their enterprises. The increase in globalization and cost competition continues to accelerate, forcing companies to seek ways to stay ahead of the competition. These factors, along with clients and their customers demanding more personalized, seamless and secure solutions, position Conduent well to capture these opportunities. Through our portfolio of digital business solutions and services, we have reached significant scale in our businesses including:

- ***Healthcare:*** The U.S. healthcare market is projected to grow at an average rate of 5.8% per year between 2024-2033. We are widely recognized by industry analysts as a leader in healthcare payer operations, serving 9 of the top 10 U.S. health plans and providing administrative and mission-critical program administration solutions for government healthcare programs serving over 111 million recipients in 34 states and the District of Columbia. Conduent's healthcare capabilities have been recognized by NelsonHall and Everest Group.
- ***Transportation:*** Traffic congestion continues to increase due to urbanization and changing global demographics. As a result, optimized transportation systems are becoming critical to increase efficiency while

maintaining strict safety requirements. Electronic toll collection and public transit represent key growth drivers as governments at all levels increasingly focus on transportation infrastructure, and we process over 14 million tolling transactions every day.

- ***Integrated Digital Solutions:*** We provide high volume print and mail services, enrollment processing and personalized communications to large corporations and are a leading provider in this market with more than 14 billion documents captured, indexed and classified annually.

***Global delivery expertise:*** Our scale and global delivery capabilities enable us to deliver our proprietary technology and differentiated service offerings seamlessly to clients around the world. We have operations in 24 countries including India, the Philippines, Jamaica, Guatemala, Mexico, Romania, the United Kingdom and several locations within the United States, providing our customers the option for "onshore", "nearshore" or "offshore" outsourced business process services. This global delivery model allows us to leverage lower-cost production locations, consistent methodologies and processes, time zone advantages and business continuity plans. As of December 31, 2025, 38% of our employees were in high-cost countries and 62% were in low-cost countries.

***Differentiated technology-led suite of multi-industry solutions:*** Through dedicated people, process expertise and technology, such as AI, analytics and automation, Conduent solutions and services create value across multiple industries by creating efficiencies, improving experiences, reducing costs and enabling revenue growth while better serving millions of end users that depend on us. By understanding our clients' businesses, we deliver performance by optimizing processes to be more efficient, flexible and secure, and our innovative, tech-led solutions are highly configurable to meet our clients' needs. We deliver value by driving better outcomes and reducing costs at scale. We enhance customer experience by improving experiences, engagement and loyalty of end users.

***Recurring revenue model supported by a loyal, diverse client base:*** We have a broad and diverse base of clients across multiple geographies and industries, including nearly half of the Fortune 100 companies, midsize businesses and governmental entities. Our strong client relationships and successful client execution support our stable, recurring revenue model and high renewal rates.

## Competition

Although we encounter competition in all areas of our portfolio, we are a leader in many categories. We compete based on technology, performance, quality, reliability, reputation, price, and customer service and support. We consider our "onshore", “near shore” and “offshore” delivery capabilities to be a competitive advantage. Our competitors range from large international companies to relatively small firms. Many of our competitors specialize in certain areas but none compete across all the same segments in our total portfolio which enables us to serve our clients end-to-end across their enterprises. Our competitors include:

- Large multinational service providers such as Accenture, Cognizant, TTEC and Teleperformance;
- Traditional business process outsourcing companies such as Genpact, Wipro and EXL Services;
- Human resource, payroll processing and human capital management providers such as Alight and Willis Towers Watson;
- Healthcare-focused IT and service solutions providers such as Gainwell, Optum and Maximus;
- U.S. Federal-focused government services providers such as Leidos;
- Transportation multi-nationals such as TransCore, Thales, Cubic and INIT; and
- Smaller, niche business processing service providers and in-house departments that perform functions that could be outsourced.

## Sales and Marketing

We market and sell our solutions and services to both potential and existing clients through our global sales and business development teams. Additionally, we have dedicated account managers and solution architects who work with clients to better understand their business requirements and tailor our standard solutions to meet their unique needs.

Our solutions solve clients' business issues and help them achieve their desired business outcomes. We leverage our broad portfolio of offerings and dedicated team of associates to package solutions that meet clients’ needs,

while taking a disciplined approach to pricing and contracting. Our sales efforts typically involve extended selling cycles where our deep domain and industry expertise is critical to winning new business. We maintain strong relationships with our clients from initial engagement to implementation and on-going service delivery.

## Intellectual Property

Generally, our policy is to seek patent protection for those inventions likely to be incorporated into our products and services or where obtaining such proprietary rights will improve our competitive position. As of December 31, 2025, we own approximately 489 U.S. patents and have 10 pending applications. Our patent portfolio evolves as new applications are filed, patents are awarded to us and as older patents expire. These patents expire on various dates, generally 20 years from their original filing dates. While we believe that our portfolio of patents and applications has value, in general, no single patent is essential to our business or to any individual segment of our business. In addition, any of our proprietary rights could be challenged, invalidated, or circumvented, or may not provide significant competitive advantages.

Our business relies on software provided, to an approximately equal extent, by both internal development and external sourcing to deliver our services. With respect to internally developed software, we claim copyright on all such software, registering works which may be accessible to third parties. In addition, we rely on maintaining source code confidentiality to ensure our market competitiveness. With respect to externally sourced software, we rely on contracts assuring our continued access for our business use.

In the United States, we own 39 registered trademarks, with 2 pending, reflecting the many businesses we participate in. These trademarks may have a perpetual life, subject to renewal every 10 years and may be subject to cancellation or invalidation based on certain use requirements and third-party challenges, or on other grounds. We vigorously enforce and protect our trademarks.

## People and Culture

### Headcount

The skills, expertise and experience of our talented and diverse global workforce allow us to deliver mission-critical services and solutions that drive exceptional client outcomes. As of December 31, 2025, we had approximately 51,000 associates in 24 countries working towards a common vision and purpose, with approximately 34% located in North America and the remainder located primarily in Asia Pacific, Latin America and the Caribbean and Europe. Our three reportable segments, Commercial, Government and Transportation, house most of our associates with approximately 37,300, 4,800 and 3,100 associates, respectively.

### Conduent Culture

At Conduent, we are committed to building a culture where individuality is recognized and valued, and where every associate feels a true sense of belonging and is empowered to bring their authentic self to work. We foster an open and inclusive workplace where people of all backgrounds have equitable opportunities to grow, do meaningful work, and contribute their unique strengths. This commitment is foundational to our business strategy, strengthens how we serve our clients, and ultimately benefits the millions of end users who interact with Conduent every day.

Our eight Employee Impact Groups are central to advancing this culture of inclusion and belonging. Through year-round programming, they support professional development, strengthen community, elevate diverse perspectives, and drive measurable business impact. In support of inclusive leadership, during 2025 we continued to deliver enterprise-wide learning and hosted leadership-led conversations focused on belonging and inclusion, working across generations, and various mental health topics.

We remain focused on attracting, retaining and developing a diverse, engaged workforce. Our efforts have been recognized through several global and regional workplace honors in recent years, including:

- Top 100 Global Most Loved Workplaces (Newsweek: 2025, 2024, 2023);
- Most Loved Workplaces in America (Newsweek: 2025, 2024, 2023);
- Best Places to Work for Disability Inclusion (Disability Equality Index: 2025, 2024, 2023); and
- Best for Vets Employers (Military Times: 2025, 2024, 2023).

**Employee Learning and Development**

Our associate learning platforms are widely utilized with approximately 1.73 million learning assets completed in 2025 (including 1.4 million developmental learning assets and 331 thousand compliance learning assets). A key focus has been learning aided by AI tools, such as AI simulators, for practicing scenarios in a safe environment, AI assistants for finding relevant online content more quickly, and AI-enabled captions of non-English online learning content, all of which enabled an 18% increase in utilization of these learning platforms. We continue to see great learning effectiveness scores for satisfaction and potential for application of learning on the job, which correlates to a 15 point increase for NPS and a 6% increase for positive experience for online learning content in 2025 versus 2024. We continue to ensure that our associates complete regulatory and compliance training on topics required based on their role and location.

**Associate Engagement**

We continuously gather associate feedback through multiple touchpoints throughout the year and leverage that feedback to both inform our talent strategy and enhance our associate experience. These touchpoints include both external recognition surveys as well as feedback gathered through internal pulse surveys, town halls, exit surveys and our internal social platform used for open and transparent communications. In 2025, Conduent was recognized among Newsweek's Top 100 Global Most Loved Workplaces. This recognition was based largely on direct feedback gathered from our associates indicating a strong "emotional connection" between associates and Conduent. We also continuously monitor feedback through our annual associate engagement survey. In 2025, our overall engagement scores remained healthy and consistent with 2024.

## Corporate Ethics

We operate according to our Ethics and Compliance Program, which is focused on sustaining an ethical culture and is designed to meet general governance and specific industry, regulatory and legal requirements. The Ethics and Compliance Program is based on our core values, including personal accountability, and is overseen by Conduent's Ethics Office.

Conduent's Code of Business Conduct is the foundation of our Ethics and Compliance Program. Our Code of Business Conduct embodies and reinforces Conduent's commitment to the highest standards of integrity and sets forth our expectations for ethical leadership, job performance, and compliance with the Code of Business Conduct and Company policies. It is designed to help associates recognize ethics and compliance issues before they arise and to deal appropriately with issues that occur.

Conduent Finance Employees are additionally required to act in accordance with our supplemental Finance Code of Conduct. Our associates are required to complete annual business ethics training. Conduent's Ethics Office periodically solicits associate input to gauge our ethical culture and help identify areas for continuing improvements.

Our directors must act in accordance with our Code of Business Conduct and Ethics for Members of the Board; our principal executive officer, principal financial officer and principal accounting officer, among others, must act in accordance with our Finance Code of Conduct; and all of our executives and employees must act in accordance with our Code of Business Conduct. Each of these codes of conduct can be accessed through our website at www.conduent.com/corporate-governance. They are also available to any shareholder who requests them in writing addressed to Conduent Incorporated, 100 Campus Drive Suite 200, Florham Park, NJ 07932, Attention: Corporate Secretary. We will disclose any future amendments to, or waivers from, provisions of our Code of Business Conduct and Ethics for Members of the Board and our Code of Business Conduct and our Finance Code of Conduct for our officers on our website as promptly as practicable, and consistent with the requirements of applicable U.S. Securities and Exchange Commission ("SEC") and Nasdaq Global Select Market ("Nasdaq") rules.

## Seasonality

Our revenues can be affected by various factors such as our clients' demand patterns for our services, which include peak windows for benefit enrollment, new product launches by clients and busy retail and travel seasons.

## Availability of Company Information

Our internet address is www.conduent.com. Our Annual Report on Form 10-K, Quarterly Reports on Form 10-Q, Current Reports on Form 8-K, our Proxy Statements and any amendments to these reports and statements are found on the Investors section of our website. We make these documents available free of charge on our website as soon as reasonably practicable after we have filed them with, or furnished them to, the SEC.

The SEC maintains an internet address (www.sec.gov) that contains reports, proxy and information statements, and other information regarding issuers that file electronically with the SEC. The content on any website referred to in this Form 10-K is not incorporated by reference in this Form 10-K unless expressly noted.

## Information about our Executive Officers

The following is a list of the executive officers of Conduent as of February 19, 2026.

Each officer is elected to hold office until the meeting of the Board of Directors held on the day of the next annual meeting of shareholders, subject to the provisions of our by-laws.

| Name | Age | Present Position | Year Appointed to Present Position | Conduent Officer Since |
|---|---|---|---|---|
| Harsha V. Agadi[1][2] | 63 | President and Chief Executive Officer | 2026 | 2026 |
| George Abate[2] | 64 | Vice President, Chief Accounting Officer | 2024 | 2024 |
| Adam Appleby[2] | 51 | Executive Vice President, Public Sector Solutions | 2024 | 2024 |
| Giles Goodburn[2] | 53 | Executive Vice President, Chief Financial Officer | 2025 | 2025 |
| Michael Krawitz | 56 | Executive Vice President, General Counsel and Secretary | 2019 | 2019 |
| Anthony Marino[2] | 62 | Executive Vice President, Chief Administrative Officer | 2025 | 2025 |
| Mark Prout | 61 | Executive Vice President, Chief Information and Technology Officer | 2019 | 2020 |

[1] Member of Conduent Board of Directors
[2] Officer or executive officer of Conduent or its subsidiaries for less than five years

As of February 19, 2026, there are no family relationships among any of the executive officers named above and any of our directors.

Mr. Agadi was appointed President and Chief Executive Officer in January 2026 after joining Conduent's Board of Directors in May of 2025. Prior to this role, Mr. Agadi served as CEO and Chairman of GHS Holdings, LLC, an investment office, since 2000. Mr. Agadi served as President and CEO of Crawford & Company (NYSE), a publicly listed independent claims management company, from 2015 until 2020. Prior to that, he served as Executive Chairman of Quiznos, LLC from February 2012 until August 2014, as Chairman and CEO of Friendly's Ice Cream LLC from August 2010 until February 2012, and President and CEO of Church's Chicken from December 2004 until December 2009. Mr. Agadi also currently serves as the non-executive Chairman of the Board of Flotek Industries, Inc. (NYSE), a publicly traded oil field service company. He also serves as Chairman of the Board of Transcend Cruises, a private company, a role he has held since 2022. Mr. Agadi also served on several public company boards in the past, including as compensation committee chair for Belmond Ltd., a worldwide hospitality and leisure company (from 2011-2019), and for Crawford & Company (from 2010-2021). Mr. Agadi is also currently the chairman of the SKSVMA College of Engineering and Agadi Sunrise Hospital Private Limited in India. Mr. Agadi holds a Bachelor of Commerce from the University of Mumbai and an MBA from Duke University's Fuqua School of Business.

Mr. Abate has served as the Vice President – Chief Accounting Officer of the Company since August 2020 and was appointed Principal Accounting Officer in August 2024. In his current role, Mr. Abate oversees the Company's accounting matters. He has held various accounting leadership roles of increasing responsibility at Conduent since 2017 and prior to that at Xerox Corporation, Fine Host Inc. and Waste Management Inc. Mr. Abate began his accounting career in the Assurance Practice of KPMG, LLP. Mr. Abate holds a Bachelor of Science in Accounting from Fairfield University.

Mr. Appleby has served as the Executive Vice President, Public Sector Solutions of the Company since July 2024. Prior to that, Mr. Appleby served the Company as President – Transportation Solutions from August 2023 until July 2024, Chief Operating Officer – Transportation Solutions from October 2022 until August 2023, and as Chief Operating Officer – Commercial Solutions from August 2020 until October 2022. In his current role, Mr. Appleby oversees the Company's portfolio of Public Sector Solutions including Government Healthcare, Eligibility and Enrollment, Payments and Child Support in the Government segment, as well as Road Usage Charging Solutions, Transit Solutions and Commercial Vehicles in the Transportation segment. Prior to joining Conduent, Mr. Appleby was SVP, Client Operation, Credit Union Solutions at Fiserv, Inc., a publicly listed financial technology company ("Fiserv") (Nasdaq), from September 2018 until August 2020. Mr. Appleby earned his Bachelor of Science degree in Environmental Science and Systems Engineering from the U.S. Military Academy at West Point and he completed Leadership Development Programs at GE, Bank of America, Ally Financial and Fiserv.

Mr. Goodburn was appointed as Chief Financial Officer of the Company in May 2025. Prior to his current role at Conduent, he served as Conduent's Head of Investor Relations and Corporate FP&A from March 2020 until May 2025. Prior to joining the Company, Mr. Goodburn served as CFO of a business segment and Vice President, Finance and Operations at Travelers. Prior to that, Mr. Goodburn held various leadership positions at GE Capital from 2001 until 2012, including as CFO of various business segments. Mr. Goodburn has global responsibility for all finance, treasury, investor relations, mergers and acquisitions, tax and audit at Conduent. Mr. Goodburn is a Chartered Global Management Accountant and a graduate of Kingston University in the UK, as well as a graduate of the GE Experienced Finance Leadership Program.

Mr. Krawitz has served as Executive Vice President, General Counsel and Secretary since November 2019. Mr. Krawitz is responsible for overseeing Conduent's global legal and enterprise risk functions, where he manages corporate governance, risk, ethics, privacy, contracting, government affairs, and all legal initiatives. Prior to joining Conduent, from June 2015 to November 2019, Mr. Krawitz was Executive Vice President, General Counsel and Corporate Secretary of insurance services firm York Risk Services Group, a portfolio company of Onex Corp. From 2014 to 2015, he was Chief Legal Officer of Veriteq Corp., a biotech company. From 1999 to 2014, Mr. Krawitz held leadership roles in public and private companies in the technology and finance sectors. Mr. Krawitz began his career at Fried Frank and earned his Bachelor of Arts in Economics and in Government from Cornell University and his Juris Doctor from Harvard Law School.

Mr. Marino joined Conduent in July 2025 as Chief Administrative Officer. Mr. Marino oversees key functions, including Human Resources, Marketing, Communications, and Procurement. Prior to Conduent, Mr. Marino was Chief Human Resources Officer for Fiserv from March 2015 to April 2025, Chief Human Resources Officer for the Guardian Life Insurance Company, an insurance company, from September 2014 to February 2015, Chief Human Resources Officer and General Manager for Bank of Tokyo Mitsubishi UFJ, a global financial services company, from January 2011 to September 2014, and Chief Human Resources Officer for Ally Financial Inc,, a bank holding company, from September 2007 to December 2010. Mr. Marino currently serves on the Board of Directors of Cypress Loan Servicing, LLC. He received his bachelor's degree in business administration from Ohio University and recently received The Walter Center Legacy in Leadership Award.

Mr. Prout joined Conduent as Head of Information Technology in June of 2019. He was appointed Executive Vice President, Chief Information & Technology Officer in September 2019. Prior to joining Conduent, between 2005 and 2019, Mr. Prout served as Chief Technology Officer of Fiserv, as well as held several IT leadership positions at Fiserv. Prior to Fiserv, he served as CIO of Cendian Corporation. Mr. Prout has also held various leadership positions at United Parcel Service. Mr. Prout earned his Bachelor's degree in business management and programming from Southern Illinois University, Carbondale.

# ITEM 1A. RISK FACTORS

## Business, Economic, Market and Operational Risks

***Our government contracts are subject to appropriation of funds, termination rights, audits and investigations, which, if exercised, could negatively impact our reputation and reduce our ability to compete for new contracts.***

A significant portion of our revenues is derived from contracts with U.S. federal, state and local governments and their agencies, and some of our revenues are derived from contracts with foreign governments and their agencies. Government entities typically finance projects through appropriated funds. While these projects are often planned and executed as multi-year projects, government entities usually reserve the right to change the scope of or terminate these projects for lack of approved funding and/or at their convenience. Changes in government or political developments, including budget deficits, shortfalls or uncertainties, failures to enact appropriation legislation (e.g., a government "shut-down"), government spending reductions or other debt or funding constraints, have resulted in, and in the future could result in, lower governmental sales and our projects being reduced in price or scope or terminated altogether, which also could limit our recovery of incurred costs, reimbursable expenses and profits on work completed prior to the termination. Additionally, if the government discovers what it considers to be improper or illegal activities or contractual non-compliance (including improper billing or non-compliant performance of contract requirements), we may be subject to various civil and criminal penalties and administrative sanctions, which has occurred in the past and may in the future include termination of contracts, forfeiture of profits, suspension of payments, contractual service penalties, fines and suspensions or debarment from doing business with the government. Any resulting penalties or sanctions could materially adversely affect our results of operations and financial condition. Moreover, government contracts are generally subject to audits and investigations by government agencies. If the government finds that we inappropriately charged any costs to a contract, the costs are not reimbursable or, if already reimbursed, the cost must be refunded to the government. Further, the negative publicity that could arise from any such penalties, sanctions or findings in such audits or investigations could have an adverse effect on our reputation in the industry and reduce our ability to compete for new contracts and could materially adversely affect our results of operations and financial condition.

***The markets in which we operate are highly competitive, and we might not be able to compete effectively.***

We operate in a global marketplace in which competition in all areas of our portfolio is vigorous. Some of our competitors possess greater financial, marketing and sales resources, and larger geographic scope in certain parts of the world than we do, which, in turn, provides them with additional leverage in the competition for contracts. In certain niche, regional or metropolitan markets, we face smaller competitors with specialized capabilities who may be able to provide competing services with greater economic efficiency. Some of our competitors have more significant operations than we do in lower cost countries that can serve as a platform from which to provide services worldwide on terms that may be more favorable. Increased competition often results in corresponding pressure on prices and terms. There can be no assurance that we will succeed in providing competitively priced services at levels of service and quality that will enable us to maintain and grow our market share.

Additionally, we derive significant revenue from contracts awarded through competitive bidding processes, including renewals, which can impose substantial costs on us, and may limit the Company’s ability to negotiate certain contractual terms and conditions. Many of these contracts are extremely complex and require the investment of significant resources in order to prepare accurate bids and proposals. Competitive bidding imposes substantial costs and presents a number of risks, including: (i) the substantial cost and managerial time and effort that we spend to prepare bids and proposals for contracts that may or may not be awarded to us; (ii) the need to estimate accurately the resources and costs that will be required to implement and service any contracts we are awarded, sometimes in advance of the final determination of their full scope and design; (iii) the expense and delay that may arise if our competitors protest or challenge awards made to us pursuant to competitive bidding and the risk that such protests or challenges could result in the requirement to resubmit bids and in the termination, reduction or modification of the awarded contracts; and (iv) the opportunity cost of not bidding on and winning other contracts we might otherwise pursue. If our competitors protest or challenge an award made to us on a government contract, the costs to defend such an award may be significant and could involve subsequent litigation that could take years to resolve.

***Our ability to recover capital and other investments in connection with our contracts is subject to risk.***

To attract and retain large outsourcing contracts, we sometimes make significant capital and other investments to enable us to perform our services under those contracts, such as purchases of information technology equipment, facility costs, labor resources and costs incurred to develop and implement software. The net book value of certain assets recorded, including a portion of our intangible assets, could be impaired, and our results of operations and financial condition could be materially adversely affected in the event of the early termination of all or a part of such a contract or a reduction in volumes and services thereunder for reasons such as a customer's or client's merger or acquisition, divestiture of assets or businesses, business failure or deterioration or a customer's or client's exercise of contract termination rights.

***Our business may be adversely affected by geopolitical events and geopolitical tensions, macroeconomic conditions, natural disasters and other factors that could directly impact certain of our employees, customers and vendors in countries or regions effected by such events and factors.***

We have a global workforce and global customers. Our employees and customers in a particular country or region in the world may be impacted as a result of a variety of diversions, including: geopolitical events and geopolitical tensions, such as war, the threat of war, or terrorist activity (including the war in the Ukraine and the conflict in the Middle East); macroeconomic conditions, such as the level of inflation, economic activity and interest rates; natural disasters or the effects of climate change (such as drought, flooding, wildfires, increased storm severity, and sea level rise); power shortages or outages and major public health issues; and significant local, national or global events capturing the attention of a large part of the population. To date, while we do not believe our business, financial position or operations have been materially impacted by these factors, we continue to monitor world events closely. If any of these factors disrupt a country or region where we have a significant workforce (such as the U.S., India or the Philippines) or customers (such as the U.S. or Europe), or vendors, our business could be materially adversely affected.

***Our results of operations and financial condition may be materially adversely affected by conditions abroad, including local economics, political environments, fluctuating foreign currencies and shifting regulatory schemes.***

Approximately 16% of our 2025 revenues was generated from operations outside the United States. In addition, we maintain significant operations outside the United States. Our results of operations and financial condition could be materially adversely affected by changes in foreign currency exchange rates, as well as by several other factors, including, without limitation, changes in economic conditions from country to country, changes in a country's political conditions, trade controls and protection measures, financial sanctions, licensing requirements, local tax issues, capitalization and other related legal matters. If we are unable to effectively hedge these risks, our results of operations and financial condition could be materially adversely affected.

***We rely to a significant extent on third-party providers, such as subcontractors, a relatively small number of primary software vendors, utility providers and network providers; if they cannot deliver or perform as expected or if our relationships with them are terminated or otherwise change, our results of operations and financial condition could be materially adversely affected.***

Our ability to service our customers and clients and deliver and implement solutions depends to a large extent on third-party providers such as subcontractors, a relatively small number of primary software vendors, software application developers, utility providers and network providers meeting their obligations to us and our expectations in a timely, quality manner. Our results of operations and financial condition have been and in the future may be materially adversely affected and we might incur significant additional liabilities if any of our third-party providers (i) do not meet their service level obligations, (ii) do not meet our or our clients' expectations, (iii) terminate or refuse to renew their relationships with us, or (iv) offer their products to us with less advantageous prices and other terms than previously offered.

***Failure to deliver on our contractual obligations properly and on time could materially adversely affect our results of operations and financial condition.***

Our business model depends in large part on our ability to retain existing and attract new work from our base of existing clients, as well as on relationships we develop with our clients so that we can understand our clients' needs and deliver solutions and services that are tailored to meet those needs. For our business to grow, we must successfully manage the provision of services under our contracts. If a client is not satisfied with the quality of work

performed by us or a subcontractor, or with the type of services or solutions delivered, or if we or our subcontractors fail to perform in accordance with contract requirements, then we could incur additional costs to address the situation, the profitability of that work might be impaired and the client's dissatisfaction with our services could damage our ability to obtain additional work from that client or obtain new work from other potential clients. Many of our contracts with non-government clients may be terminated by the client, without cause, upon specified advance notice. Accordingly, clients who are not satisfied might seek to terminate existing contracts prior to their scheduled expiration date, which may result in our inability to fully recover our up-front investments. In addition, clients could direct future business to our competitors. We could also trigger contractual credits to clients or a contractual default. Failure to properly transition new clients to our systems, properly budget transition costs or accurately estimate contract operational costs could result in delays in our contract performance, trigger service level penalties, impair fixed or intangible assets or result in contract profit margins that do not meet our expectations or our historical profit margins.

***Our business is dependent on continued interest in outsourcing.***

Our business and growth depend in large part on continued interest in outsourced business process services. Outsourcing means that an entity contracts a third-party, such as us, to provide business process services rather than perform such services in-house. There can be no assurance that this interest will continue, as organizations may elect to perform such services themselves and/or the business process outsourcing industry could move to an as-a-service model, thereby eliminating traditional business process outsourcing tasks. A significant change in this interest in outsourcing could materially adversely affect our results of operations and financial condition. Additionally, there can be no assurance that our cross-selling efforts will cause clients to purchase additional services from us or adopt a single-source outsourcing approach.

***We may be subject to claims of infringement of third-party intellectual property rights which could adversely affect our results of operation and financial condition.***

We rely heavily on the use of intellectual property. We do not own all of the software that we use to run our business; instead, we license this software from a small number of primary vendors. If these vendors assert claims that we or our clients are infringing on their software or related intellectual property, we could incur substantial costs to defend these claims, which could materially adversely affect our results of operations and financial condition. In addition, if any of our vendors' infringement claims are ultimately successful, our vendors could require us to (i) cease selling or using products or services that incorporate the challenged software or technology, (ii) obtain a license or additional licenses from our vendors or (iii) redesign our services which rely on the challenged software or technology. In addition, we may be exposed to claims for monetary damages. If we are unsuccessful in defending an infringement claim and our vendors require us to initiate any of the above actions, or we are required to pay monetary damages, then such actions could materially adversely affect our results of operations and financial condition.

***If we underestimate the scope of work or the costs entailed in performing our contracts, or if we do not fully perform our contracts, our results of operations and financial condition could be materially adversely affected.***

To stay competitive in our industry, we must keep pace with changing technologies and customer preferences. Many of our contracts require us to design, develop and implement new technological and operating systems for our customers. Many of these systems involve detailed and complex computer source code which must be created and integrated into a working system that meets contract specifications. The accounting for these contracts requires judgment relative to assessing risks, estimating costs to fulfill the contract and making assumptions for schedule and technical issues. To varying degrees, each contract type involves some risk that we could underestimate the costs and resources necessary to fulfill the contract. In each case, our failure to accurately estimate costs or the resources and technology needed to perform our contracts or to effectively manage and control our costs during the performance of our work could result, and in some instances has resulted, in reduced profits or in losses. In addition, many of our contracts contain complicated performance obligations, including, without limitation, designing and building new integrated computer systems. These contracts carry potential financial penalties or could result in financial damages or exposures if we fail to properly perform those obligations and have in the past resulted in and in the future could result in our results of operations and financial condition being materially adversely affected.

***The loss of key senior management or the failure to attract and retain necessary technical personnel and qualified subcontractors could materially adversely affect our results of operations and financial condition.***

Our success depends, in part, upon key managerial and technical personnel, including our ability to attract and retain additional qualified personnel, as well as qualified subcontractors. The loss of certain key personnel, members of our executive team and other highly skilled employees, could materially adversely affect our results of operations and financial condition. There is no assurance that we can retain our key managerial personnel, or that we can attract similar employees, in the future. Our business strategy largely depends on the success of our recent CEO transition. On January 16, 2026, Clifford Skelton stepped down from his position as President and Chief Executive Officer, and the Company appointed Harsha V. Agadi, Chairman of the Board, as his successor. Any significant leadership change involves inherent risk and can be difficult to manage. Our new CEO is critical to executing on and achieving our business strategy, and our success depends, in large part, on the effectiveness of this transition. If our new CEO is unsuccessful at leading the Company and our management team, or is unable to successfully execute the Company's strategy, our business may be harmed and our results of operations and financial condition may be adversely affected.

In addition, because we operate in intensely competitive markets, our success depends to a significant extent upon our ability to attract, retain and motivate highly skilled and qualified technical personnel and to subcontract with qualified, competent subcontractors. If we fail to attract, train and retain enough qualified engineers, technical staff and sales and marketing representatives, or if we are unable to contract with qualified, competent subcontractors, our results of operations and financial condition could be materially adversely affected. Experienced and capable personnel in the services industry remain in high demand, and there is continual competition for their talents. Our ability to renegotiate certain of our legacy third-party contracts which we view as unfavorable, or to improve the service levels we expect from these contracts and third-party providers, is key to our ability to timely, efficiently and profitably deliver our services to our customers. Additionally, we have increased and expect to continue to increase our hiring in geographic areas outside of the United States, which could subject us to increased geopolitical and exchange rate risk. The loss of any key technical employee, the loss of a key subcontractor relationship or our inability to renegotiate or obtain required service levels from legacy and other third-party providers, could materially adversely affect our results of operations and financial condition.

***If we fail to successfully develop new service offerings, including new technology components, and protect our intellectual property rights, we may be unable to retain current customers and gain new customers and our revenues would decline.***

The process of developing new service offerings, including new technology components, is inherently complex and uncertain. It requires accurate anticipation of customers' changing needs and emerging technological trends. We must make long-term investments and commit significant resources before knowing whether these investments will eventually result in service offerings that achieve customer acceptance and generate the revenues required to provide desired returns. In addition, some of our service offerings rely on technologies developed by and licensed from third-parties. We may not be able to obtain or continue to obtain licenses and technologies from these third-parties at all or on reasonable terms, or such third-parties may demand cross-licenses to our intellectual property. It is also possible that our intellectual property rights could be challenged, invalidated or circumvented, allowing others to use our intellectual property to our competitive detriment. We also must ensure that all our service offerings comply with both existing and newly enacted regulatory requirements in the countries in which they are sold. If we fail to accurately anticipate and meet our customers' needs through the development of new service offerings (including technology components) or if we fail to adequately protect our intellectual property rights or if our new service offerings are not widely accepted or if our current or future service offerings fail to meet applicable worldwide regulatory requirements, we could lose market share and customers to our competitors and that could materially adversely affect our results of operations and financial condition.

***The Company's business, operating results and reputation may be negatively impacted by failures or delays in our efforts to modernize our information technology infrastructure and to consolidate to fewer data centers.***

We have experienced certain disruptions in our operations and service delivery performance issues because of some of our information technology infrastructure that is outdated and that needs to be enhanced and updated, which disruptions have adversely impacted client and delivery performance. As a result, we embarked on a long-term project to modernize a significant portion of our information technology infrastructure with new systems and processes and to consolidate our data centers. We have systematically consolidated the majority of our technology

infrastructure into two primary data centers leading to increased processing speeds, redundancy and stability, and improved performance for our clients. There is a risk, however, that our modernization efforts and data center consolidations could materially and adversely disrupt our operations and our service delivery to customers, could result in contractual penalties or damage claims from customers, could occur over a period longer than planned, and could require greater than expected investment and other internal and external resources. It may also take longer to realize the intended favorable benefits from an enhanced technology infrastructure than we expected, or disruptions may continue to occur while we enhance this infrastructure. Future service disruptions could hinder our ability to attract new customers, cause us to incur legal liability, contractual penalties or issue service credits to our customers and cause us to lose current customers, each of which could have a material adverse effect on our business, results of operations and financial condition.

***Expectations relating to environmental, social and governance considerations expose the Company to potential liabilities, increased costs, reputational harm, and other adverse effects on the Company's business.***

Although there has been a shift in U.S. federal policy under the current presidential administration, many governments, regulators, investors, associates, clients and other stakeholders have been and/or remain focused on environmental, social and governance considerations relating to businesses. In addition, the Company makes statements about its environmental, social and governance goals and initiatives through its corporate social responsibility report, its other non-financial reports, information provided on its website, press releases and other communications.

Responding to these environmental, social and governance considerations and implementation of these goals and initiatives involves risks and uncertainties, requires capital and operating investments, and depends in part on third-party performance, or data and changing regulatory schemes that are outside the Company's control. The Company cannot guarantee that it will achieve its announced environmental, social and governance goals and initiatives. In addition, some stakeholders may disagree with the Company's goals and initiatives. Any failure, or perceived failure, by the Company to achieve its goals, further its initiatives, adhere to its public statements, comply with federal, state or international environmental, social and governance laws and regulations, or meet evolving and varied stakeholder expectations and standards could result in legal and regulatory proceedings against the Company and could materially adversely affect the Company's business, ability to recruit and retain associates, reputation, results of operations, financial condition and stock price. In addition, complying or failing to comply with existing or future federal, state, local, and foreign legislation and regulations applicable to our environmental, social and governance goals and initiatives, which may conflict with one another, could cause us to incur additional compliance and operational costs or actions and suffer reputational harm, which could materially and adversely affect our business, financial condition and results of operations.

***We cannot guarantee that our stock repurchase program will enhance long-term stockholder value. Repurchases could increase the volatility of the price of our common stock and could have a negative impact on our available cash balance.***

In May 2025, our Board of Directors authorized a three-year stock repurchase program for up to $50 million of our common stock. Stock repurchases could have an impact on our common stock trading prices, increase the volatility of the price of our common stock, or reduce our available cash balance such that we will be required to seek financing to support our operations. There is no guarantee that the repurchase program, even if fully utilized, will enhance long-term stockholder value.

***Our use of artificial intelligence involves risks such as potential liability, regulatory issues, competition, and reputational damage.***

Artificial intelligence ("AI") technologies create specific risks that require tailored governance and review. Insufficient oversight could lead to legal liability, financial loss, and reputational harm. We use AI to sort, organize, analyze, and generate data for business purposes. AI encompasses machine learning, generative AI, and other data processing techniques. The utilization of AI, whether implemented directly by us or in collaboration with third parties, will necessitate ongoing investment in governance and security resources to help ensure our responsible use of AI and to safeguard against potential risks and vulnerabilities. As these technologies evolve, some services and tasks currently performed by our associates may be replaced by automation, including AI-enabled solutions, which could lead to reduced demand for our services and/or reduce the required headcount for us to provide services. The use of AI carries considerable risks, and we cannot guarantee the achievement of intended outcomes. While we aim to

develop and use AI responsibly and attempt to identify and mitigate ethical and legal issues presented by its use, we may be unsuccessful in identifying or resolving issues before they arise. As an evolving technology, AI may occasionally produce incomplete or misleading results. Despite training and risk management efforts, there is a possibility that employees might misuse AI, either intentionally or unintentionally. Should our AI generate suboptimal or contentious outcomes, or if public perception of AI shifts negatively due to perceived risks, we may encounter operational challenges, competitive disadvantages, legal liabilities, reputational harm, or other business impacts. AI-related legal and regulatory frameworks are evolving due to concerns about bias, discrimination, transparency, and security. The use of AI technologies involves issues associated with intellectual property, data privacy, consumer protection, competition, and equal opportunity, with potential for new regulations. Several jurisdictions where we operate are considering or have proposed or enacted legislation and policies regulating AI and non-personal data, such as the European Union's AI Act and the U.S.'s Executive Orders and U.S. state laws, some of which may be conflicting. New or expanded AI laws could raise compliance costs and pose unpredictable risks, which could materially adversely affect our results of operations and financial condition.

## Legal, Compliance and Data Security Risks

***We are subject to laws of the United States and foreign jurisdictions relating to individually identifiable information and personal health information, and failure to comply with those laws, whether or not inadvertent, could subject us to legal actions and negatively impact our operations.***

We receive, process, transmit and store information relating to identifiable individuals, both in our role as a service provider and as an employer. As a result, we are subject to numerous laws and regulations in the United States (both federal and state) and foreign laws and regulations designed to protect both individually identifiable information and personal health information, including the Health Insurance Portability and Accountability Act of 1996, as amended ("HIPAA"), and the regulations promulgated under HIPPA governing, among other things, the privacy, security and electronic transmission of individually identifiable health information, various state privacy laws, and the European Union General Data Protection Regulation ("GDPR"), which imposes stringent data protection requirements and significant penalties for non-compliance and has had a significant impact on how we process and handle certain data.

Additional laws of the United States (both federal and state) and foreign jurisdictions apply to our processing of individually identifiable information. These laws have been subject to frequent changes, and new legislation in this area may be enacted at any time. For example, the GDPR and the invalidation of the U.S.-EU Safe Harbor regime have required us to implement alternative mechanisms for some of our data flows from Europe to the United States to comply with applicable law. Changes to existing laws, the introduction of new laws in this area or our failure to comply with existing laws that are applicable to us may subject us to, among other things, additional costs or changes to our business practices, liability for monetary damages, fines and/or criminal prosecution, unfavorable publicity, restrictions on our ability to obtain and process information and allegations by our customers and clients that we have not performed our contractual obligations, any of which could materially adversely affect our results of operations and financial condition.

***We are subject to laws of the United States and foreign jurisdictions relating to processing certain financial transactions, including payment card transactions and debit or credit card transactions, and failure to comply with those laws, whether or not inadvertent, could subject us to legal actions and materially adversely affect our results of operations and financial condition.***

We process, support and execute financial transactions, and disburse funds, on behalf of both government and commercial customers, often in partnership with financial institutions. This activity includes receiving debit and credit card information, processing payments for and due to our customers and disbursing funds on payment or debit cards to payees of our customers. As a result, we are subject to numerous laws and regulations in the United States (both federal and state) and in foreign jurisdictions, including the Electronic Fund Transfer Act, as amended, the Currency and Foreign Transactions Reporting Act of 1970 (commonly known as the "Bank Secrecy Act"), as amended, the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (including the so-called Durbin Amendment), as amended, the Gramm-Leach-Bliley Act (also known as the "Financial Modernization Act of 1999"), as amended, and the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 ("USA PATRIOT ACT"), as amended. Other United States (both federal and state) and foreign jurisdiction laws apply to our processing of certain financial transactions and related support services. These laws are subject to frequent changes, and new statutes and regulations in this area may be enacted at any time. Changes to existing laws, the introduction of new laws in this area or our failure to comply with existing laws

that are applicable to us may subject us to, among other things, additional costs or changes to our business practices, liability for monetary damages, fines and civil and/or criminal prosecution, unfavorable publicity, restrictions on our ability to process and support financial transactions and allegations by our customers, partners and clients that we have not performed our contractual obligations. Any of these could materially adversely affect our results of operations and financial condition.

***Our data systems, information systems and network infrastructure have been, and may in the future be, subject to hacking or other cybersecurity threats and other service interruptions, which could expose us to liability, impair our reputation or temporarily render us unable to fulfill our service obligations under our contracts.***

As a leader in business process solutions, we leverage cloud computing, AI, machine learning and advanced analytics. We act as a trusted business partner in both front-office and back-office platforms, providing interactions on a substantial scale with our customers and other third-parties. Our customers include global commercial clients and government clients who depend upon our operational efficiency, non-interruption of service, and accuracy and security of information. We also use third-party providers such as subcontractors, software vendors, utility providers and network providers, upon whom we rely to support our business process solutions, to deliver uninterrupted, secure service. As part of our business process solutions, we also develop system software platforms necessary to support our customers' needs, with significant ongoing investment in developing and operating customer-appropriate operating systems, databases and system software solutions. We also receive, process, transmit and store substantial volumes of information relating to identifiable individuals, both in our role as a solution provider and as an employer, and we are subject to numerous laws, rules and regulations in the United States (both federal and state) and foreign jurisdictions designed to protect both individually identifiable information as well as personal health information. We also receive, process and implement financial transactions, and disburse funds, on behalf of both commercial and government customers, which activity includes receiving debit and credit card information to process payments due to our customers as well as disbursing funds to payees of our customers. As a result of these and other business process solutions, the integrity, security, accuracy and non-interruption of our systems and information technology and that of our third-party providers and our interfaces with our customers are extremely important to our business, operating results, growth, prospects and reputation.

We have in the past been, and remain, susceptible to breach of security systems which may result and has resulted in unauthorized access to our facilities and those of our customers and/or access to and exfiltration of the information we and our customers are trying to protect. Cybersecurity failure might be caused by computer hacking, compromised credentials, malware, computer viruses, worms, trojans, ransomware and other destructive software, "cyber-attacks" and other malicious activity, as well as natural disasters, power outages, terrorist attacks and similar events. Operational or business delays may also result from the disruption of network or information systems and subsequent remediation activities.

Because the techniques used to obtain unauthorized access are constantly changing and becoming increasingly more sophisticated and often are not recognized until launched against a target, we or our third-party service providers may be unable to anticipate these techniques or implement sufficient preventative measures. Unauthorized access, hacking, malware, phishing, viruses, worms, trojans, ransomware and other "cyber-attacks" have become more prevalent, have occurred in our systems in the past, and may occur in our systems in the future. Our cyber practices and cybersecurity systems may prove to be inadequate and result in the disruption, failure, misappropriation or corruption of our network and information systems and it may not be possible for us to fully or timely know if or when such incidents arise, or the full business impact of any cybersecurity breach.

Additionally, with advances in computer capabilities and data protection requirements to address ongoing threats, we may be required to expend significant capital and other resources to protect against potential security breaches or to alleviate problems caused by security breaches. Moreover, employee error or malfeasance, faulty password management or other irregularities may result in a defeat of our or our third-party service providers' security measures and a breach of our or our third-party service providers' information systems (whether digital, cloud-based or otherwise). In addition, the increased use of employee-owned devices for communications as well as work-from-home arrangements, present additional operational risks to our information technology systems, including, but not limited to, increased risks of cyber-attacks.

We have in the past experienced, and in the future could experience, an unauthorized party gaining physical access to one of our or one of our third-party service providers' facilities or gain electronic access to our or one of our third-party service providers' information systems. For example, on January 13, 2025, the Company experienced an operational disruption and learned that a threat actor gained unauthorized access to a limited portion of the

Company's environment and exfiltrated a set of files associated with a subset of the Company's clients. For additional information, refer to Management's Discussion and Analysis of Financial Condition and Results of Operation – "Cyber Event" in Part II, Item 7 to this 10-K and Note 15 – Contingencies and Litigation to our Consolidated Financial Statements of Part II, Item 8 to this 10-K. This and any other such access could result in, among other things, unfavorable publicity and significant damage to our brand, governmental inquiry, oversight and possible regulatory action, difficulty in marketing our services, loss of existing and potential customers, allegations by our customers that we have not performed our contractual obligations, costs for contractual service level requirements or other financial impact experienced by customers, litigation by affected parties and possible financial obligations for substantial damages related to the theft or misuse of such information, any of which could materially adversely affect our results of operations and financial condition. Similar consequences may arise if sensitive or confidential information is misdirected, lost or stolen during transmission or transport, or is stolen or misused. Moreover, security breaches have and could require us to devote significant management resources to address the problems created by the security breach and to expend significant additional resources to upgrade further the security measures that we employ to guard such personal information against "cyber-attacks" and to maintain various systems and data centers for our customers. Often these systems and data centers must be maintained worldwide and on a 24/7 basis. We have in the past experienced and in the future could experience service interruptions that could result in curtailed operations and loss of existing and potential customers, which could significantly reduce our revenues and profits in addition to significantly impairing our reputation. If our information systems and our back-up systems are damaged, breached or cease to function properly, we may have to make a significant investment to repair or replace them, and we may suffer interruptions in our operations in the interim, each of which could materially adversely affect our results of operations and financial condition.

In addition, our and our customers' systems and networks are subject to continued threats of terrorism, which could disrupt our operations as well as disrupt the utilities and telecommunications infrastructure on which our business depends. To the extent any such disruptions were to occur, our business, operating results and financial condition could be materially adversely affected. In addition, our liability insurance, which includes cyber insurance, might not be sufficient in type or amount to cover us, or the carrier may decline to cover us, against claims related to security incidents, cyberattacks and other related incidents.

***If we fail to meet industry data security standards, our ability to meet contractual obligations may be impaired and result in contractual damage or contract breach claims.***

In some of our services lines, we are contractually subject to industry data security standards. These industry data security standards include Card Brand (Visa, Mastercard, American Express, Discover and JCB) operating rules, certification requirements and rules governing electronic funds transfers, including the Payment Card Industry Data Security Standard ("PCI DSS"), a data security standard applicable to companies that collect, store or transmit payment card data. Another industry standard is the Health Information Trust Alliance ("HITRUST") which applies to aspects of the healthcare industry in addition to other industries. In the future we may not be able to maintain compliance with PCI DSS, HITRUST and other applicable industry standards. Any failure to comply fully or materially with PCI DSS, HITRUST and other applicable industry standards now or at any point in the future may provide customers the right to terminate contracts with us or to enforce provisions obligating us to reimburse them for any penalties or costs incurred by them as a result of our non-compliance, or subject us to other fines, penalties, damages or civil liability, each of which could have a material adverse effect on our business, financial condition and results of operations.

***Our results of operations and financial condition could be materially adversely affected by legal and regulatory matters.***

We are potentially subject to various contingent liabilities that are not reflected on our balance sheet, including those arising as a result of being involved in a variety of claims, lawsuits, investigations and proceedings concerning: securities laws; governmental and non-governmental entity contracting, servicing and governmental entity procurement laws; intellectual property laws; environmental laws; employment laws; the Employee Retirement Income Security Act of 1974 ("ERISA"); cyber-security and data privacy laws; and other laws, regulations and contractual undertakings, as discussed under Note 15 – Contingencies and Litigation to the Consolidated Financial Statements. If developments in any of these matters cause a change in our determination as to an unfavorable outcome and result in the need to recognize a material accrual or materially increase an existing accrual, or if any of these matters result in an adverse judgment or are settled for significant amounts above any existing accruals, it could materially adversely affect our results of operations and financial condition in the period or periods in which such change in determination, judgment or settlement occurs. There can be no assurances as to the favorable

outcome of any claim, lawsuit, investigation or proceeding. It is possible that a resolution of one or more such proceedings, through judgment, settlement or otherwise, could require us to make substantial payments to satisfy judgments, fines or penalties or settlement amounts, any of which could materially adversely affect our results of operations and financial condition. Additionally, the terms of dismissal, settlement, release or other resolution may permit certain claims to be reopened under certain conditions. Claims, lawsuits investigations and proceedings involving the Company could also result in reputational harm, criminal sanctions, consent decrees or orders preventing us from offering certain services, requiring a change in our business practices in costly ways or requiring development of non-infringing or otherwise altered products or technologies, or make it more difficult to obtain adequate insurance in the future. In addition, it can be very costly to defend litigation and these costs could materially adversely affect our results of operations and financial condition. Refer to Note 15 – Contingencies and Litigation to the Consolidated Financial Statements.

Our insurance does not cover all types and amounts of potential liabilities and is subject to various exclusions as well as caps on amounts recoverable. Even if we believe a claim is covered by insurance, insurers may dispute our entitlement to recovery for a variety of potential reasons, which may affect the timing and, if they prevail, the amount of our recovery.

***We have made and may continue to make divestitures, as well as acquisitions, investments and joint ventures, all of which involve numerous risks and uncertainties.***

We have divested and may in the future divest certain assets or businesses, including businesses that are no longer a part of our ongoing strategic plan. Divestitures require a significant investment of time and resources and involve significant risks and uncertainties, including:

- inability to find potential buyers on favorable terms;
- failure to effectively transfer liabilities, contracts, facilities and employees to buyers;
- requirements that we retain or indemnify buyers against certain liabilities and obligations;
- the possibility that we will become subject to third-party claims arising out of such divestiture;
- challenges in identifying and separating the intellectual property, systems and data to be divested from the intellectual property, systems and data that we wish to retain;
- inability to reduce fixed costs previously associated with the divested assets or business;
- challenges in collecting the proceeds from any divestiture;
- disruption of our ongoing business and distraction of management;
- loss of key employees who leave us as a result of a divestiture; and
- if customers or partners of the divested business do not receive the same level of service from the new owners, or the new owners do not handle the customer data with the same level of care, our other businesses may be adversely affected, to the extent that these customers or partners also purchase other products offered by us or otherwise conduct business with our retained business.

Divestitures may result in losses on disposal or continued financial involvement in the divested business, including through indemnification, guarantee or other financial arrangements, for a period of time following the transaction, which would adversely affect our financial results. Refer to Note 4 – Divestitures to our Consolidated Financial Statements for additional information about our divestitures.

Additionally, we may selectively pursue strategic acquisitions, investments and joint ventures. We also may enter into relationships with other businesses to expand our products or our ability to provide services. Acquisitions, investments and joint ventures similarly pose a number of risks and potential disruptions that could adversely affect our reputation, operations or financial results, including: expansion into new markets and business ventures; the diversion of management's attention to the acquisition and integration of acquired operations and personnel; being bound by acquired customer or vendor contracts with unfavorable terms; and potential adverse effects on a company's operating results for various reasons, including, but not limited to, the following items: the inability to achieve financial targets; the inability to achieve certain integration expectations, operating goals, and synergies; costs incurred to exit current or acquired contracts or restructuring activities; costs incurred to service acquisition debt, if any; and the amortization or impairment of acquired intangible assets.

## Financial Risks

***We have recorded significant goodwill impairment charges and may be required to record additional charges to future earnings if our goodwill or intangible assets become impaired.***

We are required under generally accepted accounting principles to review our intangible assets for impairment when events or changes in circumstances indicate the carrying value may not be recoverable. Goodwill is required to be tested for impairment at least annually. Factors that may be considered a change in circumstances indicating that the carrying value of our intangible assets and/or goodwill may not be recoverable include a decline in stock price and market capitalization, slower growth rates in our industry or our own operations, and/or other materially adverse events that have implications on the profitability of our business or business segments. We may be required to record additional charges to earnings during the period in which any impairment of our goodwill or other intangible assets is determined which could adversely impact our results of operations. As of December 31, 2025, our goodwill balance, related exclusively to our Government segment, was $617 million, which represented 25.7% of total consolidated assets.

Refer to Note 7 – Goodwill to our Consolidated Financial Statements for additional information about our goodwill impairments.

***Our significant indebtedness could materially adversely affect our results of operations and financial condition.***

We have and will continue to have a significant amount of debt and other obligations. Our substantial debt and other obligations could have important consequences.

For example, it could (i) increase our vulnerability to general adverse economic and industry conditions; (ii) limit our ability to obtain additional financing for future working capital, capital expenditures, acquisitions and other general corporate requirements; (iii) require us to dedicate a substantial portion of our cash flows from operations to service debt and other obligations thereby reducing the availability of our cash flows from operations for other purposes; (iv) limit our flexibility in planning for, or reacting to, changes in our businesses and the industries in which we operate; (v) place us at a competitive disadvantage compared to our competitors that have less debt; and (vi) become due and payable upon a change in control. If new debt is added to our current debt levels, these related risks could increase.

Our ability to make payments on and to refinance our indebtedness, as well as any future debt that we may incur, will depend on our ability to generate cash in the future from operations, financings or asset sales. Our ability to generate cash is subject to general economic, financial, competitive, legislative, regulatory and other factors that are beyond our control.

***The terms of our indebtedness may restrict our current and future operations, particularly our ability to incur debt that we may need to fund initiatives in response to changes in our business, the industries in which we operate, the economy and governmental regulations.***

The terms of our indebtedness include several restrictive covenants that impose significant operating and financial restrictions on us and our subsidiaries and limit our ability to engage in actions that may be in our long-term best interests. These may restrict our and our subsidiaries' ability to take some or all the following actions:

- incur or guarantee additional indebtedness or sell disqualified or preferred stock;
- pay dividends on, make distributions in respect of, repurchase or redeem capital stock;
- make investments or acquisitions;
- sell, transfer or otherwise dispose of certain assets;
- create liens;
- enter sale/leaseback transactions;
- enter agreements restricting the ability to pay dividends or make other intercompany transfers;
- consolidate, merge, sell or otherwise dispose of all or substantially all of our or our subsidiaries' assets;
- enter transactions with affiliates;
- prepay, repurchase or redeem certain kinds of indebtedness;

- issue or sell stock of our subsidiaries; and/or
- significantly change the nature of our business.

As a result of all these restrictions, we may be:

- limited in how we conduct our business and pursue our strategy;
- unable to raise additional debt financing to operate during general economic or business downturns; or
- unable to compete effectively or to take advantage of new business opportunities.

A breach of any of the restrictive covenants, if applicable, could result in an event of default under the terms of this indebtedness. If an event of default occurs, the lenders would have the right to accelerate the repayment of such debt and the event of default or acceleration may result in the acceleration of the repayment of any other of our debt to which a cross-default or cross-acceleration provision applies. Furthermore, under this indebtedness we have pledged our assets as collateral as security for our repayment obligations. If we were unable to repay any amount of this indebtedness when due and payable, the lenders could proceed against the collateral that secures this indebtedness. In the event our creditors accelerate the repayment of our borrowings, we may not have sufficient assets to repay such indebtedness, which could materially adversely affect our results of operations and financial condition.

***The failure to obtain or maintain a satisfactory credit rating and financial performance, or the requirement to post collateral for any of our business guarantees, could adversely affect our liquidity, capital position, borrowing costs, access to capital markets and our need or ability to post surety or performance bonds to support clients' contracts.***

Any future downgrades to our credit rating or perceived or actual weakness in our financial performance could negatively impact our ability to renew contracts with our existing clients and vendors, limit our ability to compete for new clients, result in increased premiums for surety or performance bonds and letters of credit to support our clients' contracts, reduce our ability to obtain surety bonds, performance bonds and letters of credit and/or result in a requirement that we provide collateral to secure our surety or performance bonds and letters of credit.

These instruments are generally issued by insurance companies or other financial institutions and typically include provisions that allow the issuer, in its discretion, to require us to post collateral. Collateral demands may be based on factors outside our control—including the issuer's internal risk assessments, changes in market conditions, or their evaluation of our financial position—and may occur with little or no advance notice. Any such requirement could exceed our available liquidity or require us to divert capital from other operational or strategic uses. If we are unable to satisfy a collateral demand, the issuer may take actions that could impair our ability to continue performing under the related contracts, which could harm our reputation, restrict our ability to bid on future work or result in financial penalties. Any significant collateral demand, individually or in the aggregate, could materially adversely affect our liquidity, financial condition and results of operations. Refer to Note 15 – Contingencies and Litigation to the Consolidated Financial Statements for additional information.

Further, certain of our commercial outsourcing contracts provide that, in the event our credit ratings are downgraded to specified levels, the client may elect to terminate its contract with us and either pay a reduced termination fee or, in some limited instances, no termination fee. Such a credit rating downgrade or perceived or actual weakness in our financial performance could adversely affect these client relationships.

There can be no assurance that we will be able to maintain our credit ratings or financial performance. Any additional actual or anticipated downgrades of our credit ratings, including any announcement that our ratings are under review for a downgrade, or perceived or actual weak financial performance may have a negative impact on our liquidity, capital position, access to capital markets and ability to obtain surety bonds, performance bonds and letters of credit sufficient to support our existing and future business needs, and may also increase the likelihood or magnitude of collateral demands under our business guarantees.

***Our profitability is dependent upon our ability to obtain adequate pricing for our services and to improve our cost structure.***

Our success depends on our ability to obtain adequate pricing for our services that will provide a reasonable return to our shareholders. Depending on competitive market factors, future prices we obtain for our services may decline from previous levels. If we are unable to obtain adequate pricing for our services, it could materially adversely affect

our results of operations and financial condition. In addition, our contracts are increasingly requiring tighter timelines for implementation as well as more stringent service level metrics. This makes the bidding process for new contracts much more difficult and requires us to adequately consider these requirements in the pricing of our services.

To meet the service requirements of our customers, which often includes 24/7 service, and to optimize our employee cost base, including our back-office support, we often locate our delivery service and back-office support centers in lower-cost locations, including several developing countries. Concentrating our centers in these locations presents several operational risks, many of which are beyond our control, including the risks of political instability, natural disasters, safety and security risks, labor disruptions, excessive employee turnover and rising labor rates. Additionally, a change in the political environment in the United States or the adoption and enforcement of legislation and regulations curbing the use of such centers outside of the United States could materially adversely affect our results of operations and financial condition. These risks could impair our ability to effectively provide services to our customers and keep our costs aligned to our associated revenues and market requirements.

Our ability to sustain and improve profit margins is dependent on a number of factors, including our ability to continue to improve the cost efficiency of our operations through such programs as robotic process automation, to absorb the level of pricing pressures on our services through cost improvements, our ability to hire and retain employees in the current global labor markets and to successfully complete information technology initiatives. If any of these factors adversely materialize or if we are unable to achieve and maintain productivity improvements through restructuring actions or information technology initiatives, our ability to offset labor cost inflation and competitive price pressures would be impaired, each of which could materially adversely affect our results of operations and financial condition.

***If we are unable to collect our receivables for billed or unbilled services, our results of operations and financial condition could be materially adversely affected.***

The profitability of certain of our large contracts depends on our ability to successfully obtain payment from our clients of the amounts they owe us for work performed. Actual losses on client balances could differ from current estimates and, as a result, may require adjustment of our receivables for unbilled services. Our receivables include long-term contracts. Over the course of a long-term contract, our customers' financial condition may change such that their ability to pay their obligations, and our ability to collect our fees for services rendered, is adversely affected. Additionally, we may perform work for the federal, state and local governments, with respect to which we must file requests for equitable adjustment or claims with the proper agency to seek recovery in whole or in part, for out-of-scope work directed or caused by the government customer in support of its project, and the amounts of such recoveries may not meet our expectations or cover our costs. Timely collection of client balances also depends on our ability to complete our contractual commitments (such as our ability to achieve specified milestones in percentage-of-completion contracts) and bill and collect our contracted revenues. If we are unable to meet our contractual requirements, we might experience delays in collection of and/or be unable to collect our client balances, and if this occurs, our results of operations and financial condition could be adversely affected. In addition, if we experience an increase in the time to bill and collect for our services, our results of operations and financial condition could be materially adversely affected.

***A decline in revenues from or a loss or failure of significant clients could materially adversely affect our results of operations and financial condition.***

Our results of operations and financial condition could be materially adversely affected by the loss or failure of significant clients or any significant reduction in revenue volumes from our significant clients, which has occurred in the past and could occur in the future. Some of our clients are in business sectors which have experienced significant financial difficulties or consolidation, and/or the reduction of volumes or their inability to make payments to us, as a result of, among other things, their merger or acquisition, divestiture of assets or businesses, contract expiration, nonrenewal or early termination (including termination for convenience) or business or financial failure or deterioration. Economic and political conditions could affect our clients' businesses and the markets they serve. The loss of significant clients or a significant reduction in volume from our significant clients as a result of these or other reasons would materially adversely affect our results of operations and financial condition.

***We have non-recurring revenue, which subjects us to a risk that our revenues and cash flows from operations may fluctuate from period to period.***

Revenue generated from our non-recurring services may fluctuate due to factors both within and outside of our control. Our mix of non-recurring and recurring revenues is impacted by acquisitions as well as growth in our non-recurring lines of business, as well as our strategic decisions to exit or reduce our services in particular service areas. There is less predictability and certainty in the timing and amount of revenues generated by our non-recurring services and, accordingly, our results of operations and financial condition could be materially adversely affected by the timing and amount of revenues generated from our non-recurring services.

***Increases in the cost of voice and data services or significant interruptions in such services could materially adversely affect our results of operations and financial condition.***

Our business is significantly dependent on voice and data services provided by various communication and data service providers around the world. Accordingly, any disruption of these services could materially adversely affect our results of operations and financial condition. Any inability to obtain voice or data services at favorable rates could materially adversely affect our results of operations and financial condition. Where possible, we have entered into long term contracts with various providers to have price certainty and avoid short term rate increases and fluctuations. There is no obligation for our vendors to renew their long-term contracts with us, or to offer the same or lower rates in the future, and such contracts are subject to termination or modification for various reasons outside of our control. A significant increase in the cost of voice or data services that is not recoverable through an increase in the price of our services could materially adversely affect our results of operations and financial condition. In addition, a number of our facilities are located in jurisdictions outside of the United States where the provision of utility services, including electricity and water, may not be consistently reliable, and an extended outage of utility or network services could materially adversely affect our results of operations and financial condition.

***We are a holding company and, therefore, may not be able to receive dividends or other payments in needed amounts from our subsidiaries.***

Our principal assets are the shares of capital stock and indebtedness of our subsidiaries. We rely on dividends, interest and other payments from these subsidiaries to meet our obligations for paying principal and interest on outstanding debt obligations, paying corporate expenses and, if determined by our Board of Directors, paying dividends to shareholders and repurchasing common shares. Certain of our subsidiaries are subject to regulatory requirements of the jurisdictions in which they operate or other restrictions that may limit the amounts that these subsidiaries can pay in dividends or other payments to us. No assurance can be given that there will not be further changes in law, regulatory actions or other circumstances that could restrict the ability of our subsidiaries to pay dividends to us. In addition, due to differences in tax rates, repatriation of funds from certain countries into the United States could have unfavorable tax ramifications for us.

***We operate globally and changes in tax laws could adversely affect our results.***

We monitor U.S. and non-U.S. tax law changes that may adversely impact our overall tax costs. From time to time, proposals have been made and/or legislation has been introduced to change tax rates, as well as related tax laws, regulations or interpretations thereof, by various jurisdictions, or to limit tax treaty benefits which, if enacted or implemented, could materially increase our tax costs and/or our effective tax rate and could have a material adverse impact on our financial condition and results of operations. In addition, we are subject to the examination of our income tax returns by the United States Internal Revenue Service and other tax authorities around the world. We regularly assess the likelihood of adverse outcomes resulting from these examinations to determine the adequacy of its provision for income taxes. There can be no assurance that the outcomes from these examinations will not have an adverse effect on our provision for income taxes and cash tax liability.

## ITEM 1B. UNRESOLVED STAFF COMMENTS

None.

## ITEM 1C. CYBERSECURITY MATTERS

As a leader in business process solutions, we leverage cloud computing, AI, machine learning, automation and advanced analytics, our systems and information technology, and that of our third-party providers, and our interfaces with our customers are critical to our business, operating results, growth, prospects and reputation.

We act as a trusted business partner in providing both front-office and back-office platforms. As part of our business process outsourcing solutions, we develop system software platforms necessary to support our customers' needs, with significant ongoing investment in developing and operating customer-appropriate operating systems, databases, and system software solutions. We also receive, process, transmit, and store substantial volumes of personal information relating to identifiable individuals. Additionally, we receive, process, and implement financial transactions and disburse funds on behalf of both commercial and government customers.

We devote significant resources to cybersecurity and cybersecurity risk management processes to adapt to the changing cybersecurity landscape and to respond to emerging threats. We maintain a cybersecurity risk management program to assess, identify, manage, mitigate, and respond to material risks from cybersecurity threats to both our corporate information technology environment and customer-facing products. These processes are integrated into our overall Enterprise Risk Management ("ERM") program, which is designed to strengthen our risk management capabilities by developing and implementing a governance structure, risk management framework, and processes that enable the identification, assessment, monitoring, and management of risks.

The underlying controls of our cybersecurity risk management program are based upon industry standards for cybersecurity and information technology. Our corporate information technology environment aligns with the Center for Internet Security ("CIS") Critical Security Controls ("CSC"). Our systems that manage customer-facing products, where appropriate and contractually required, are certified/attested to applicable security standards, including, without limitation, National Institute of Standards and Technology ("NIST") (NIST Special Publication 800-53 rev 5 moderate baseline), Payment Card Industry Data Security Standard ("PCI-DSS"), Health Insurance Portability and Accountability Act ("HIPAA"), International Organization for Standardization ("ISO"), the International Electrotechnical Commission ("IEC") Standard (ISO/IEC 27001:2013 & ISO 9001:2015), and Systems and Organization Controls ("SOC") 2 standards. Our policies and procedures concerning cybersecurity matters include processes to safeguard our information systems, monitor these systems, protect the confidentiality and integrity of our data, train and raise awareness of cybersecurity threats among employees, detect intrusions into our systems, and respond to cybersecurity incidents.

As part of our overall risk management strategy, we leverage a defense in depth philosophy, which includes, but is not limited to, additional end-user training, layered technology defenses, identifying and protecting critical assets, strengthening monitoring and warning systems, and engaging industry and subject matter experts. We regularly test defenses by performing simulations and exercises at both a technical level and by reviewing our operational policies and procedures with third-party experts. At the management level, our cybersecurity team regularly monitors alerts and meets to discuss industry threats, trends, and remediation tactics. The cybersecurity team also regularly prepares a cyber update that includes metrics and compliance performance, incorporating data on cybersecurity threats and risks, which it uses to assess and refine Conduent's overall security posture. Furthermore, we receive cybersecurity alerts and threat intelligence from our peers, government agencies, information sharing and analysis centers and cybersecurity associations, as well as conduct periodic external penetration tests and gap testing to assess our processes and procedures and the ever-changing threat landscape. We have created and continually update, as required, a detailed incident response plan, which outlines the steps to be followed from incident detection to eradication, recovery and notification, and which we implement in the event of a cybersecurity incident.

We also engage third parties and cybersecurity consultants on a regular basis to assess, test, and assist with the implementation of our risk management strategies, policies and procedures to enhance our detection, response and management of cybersecurity risks and compliance frameworks, including but not limited to, consultants who assist with risk assessment, third parties who assist with our PCI-DSS compliance assessments, and auditors who audit our systems to ensure adherence to the relevant standard under evaluation.

We rely on a variety of security software, including cloud-based technology to scan and analyze for vulnerable software or misconfigurations, for our operations and our business processing solutions. These systems are either developed by us or licensed from or maintained by third-party providers. We assess key third-party cybersecurity controls through a cybersecurity questionnaire, require the implementation of certain security controls in our

contracts where applicable, monitor the third party, and maintain the ability to discontinue our engagement with a key vendor if its cybersecurity posture fails to meet pre-established standards.

Our Board of Directors (the "Board") maintains oversight responsibility for our ERM program. This oversight is facilitated primarily through the Risk Oversight Committee of the Board (the "Risk Committee"), which reviews the ERM program, related assessments and remediation activities for subsequent review by the Board. As part of its ERM oversight responsibilities, the Risk Committee is responsible for oversight of the Company's cybersecurity risk management, including the Company's material programs, policies and safeguards for information security, cybersecurity and data security. At least quarterly (and more frequently as required), the Risk Committee and Audit Committee meet with management, including the Chief Information Security Officer (the "CISO"), to discuss, assess and determine the allocation of resources to risk matters, including cybersecurity risks, which enables effective integration of risk practices into strategic planning and enterprise decision-making.

The Risk Committee works with the CISO and the Company's senior executives in reviewing the cybersecurity risks and strategy, provides guidance on the Company's cybersecurity goals and objectives, and monitors the information it receives from management regarding the assessment and management of cybersecurity risk. The Risk Committee also conducts an annual review that includes a survey of enhancements to the Company's defenses as well as management's progress in implementing the Company's cybersecurity strategic roadmap and compliance initiatives.

The Company's CISO, a Certified Information Systems Professional with over 15 years of technical and cybersecurity leadership in large multinational organizations, reports to our Executive Vice President, Chief Information Officer and is responsible for assessing, implementing, and managing the Company's cybersecurity risk management program, informing senior management regarding the prevention, detection, mitigation and remediation of cybersecurity incidents, as well as supervising such efforts. The CISO approves cybersecurity policies and procedures, implementation of controls, monitoring and detection programs and employee training on cybersecurity risks. The CISO also reports cybersecurity risks and strategies directly to executive leadership. In addition, the Company has implemented an Incident Response Materiality Assessment Committee ("IRMAC"), which consists of members from the Senior Leadership Team and is responsible for assessing the materiality of a cybersecurity incident referred to it by the Cybersecurity Incident Response Team ("CSIRT"). Procedures exist to ensure the Risk Committee of the Board of Directors, and if appropriate, the full Board of Directors is notified about cybersecurity incidents being assessed by the IRMAC.

As noted above, we face a number of cybersecurity risks in connection with our business and, from time to time, experience or are subject to a variety of cybersecurity incidents that arise during the ordinary course of our business, such as the previously disclosed January 2025 Cyber Event (for additional information, refer to Management's Discussion and Analysis of Financial Condition and Results of Operation – "Cyber Event" in Part II, Item 7 to this 10-K and Note 15 – Contingencies and Litigation to our Consolidated Financial Statements of Part II, Item 8 to this 10-K). As of the date of this report, apart from the January 2025 Cyber Event (for which we maintain a liability on the Consolidated Balance Sheet for our expected remaining cash outlay), we do not believe that any risks from cybersecurity threats, including because of any known cybersecurity incidents, have materially affected, or are reasonably likely to materially affect, the Company. New information discovered after the date of this report concerning any known cybersecurity incidents that have occurred prior to the date of this report, however, could change our current belief and could result in a material adverse effect on our business strategy, results of operations, reputation or financial condition. In addition, future cybersecurity incidents could materially affect our strategy, results of operations, reputation or financial condition. See Item 1A. Risk Factors for additional information on how risks could materially affect the Company.

## ITEM 2. PROPERTIES

We lease and own numerous facilities worldwide with larger concentrations of space in Kentucky, New Jersey, Texas, Guatemala, India, the Philippines, Jamaica and the Netherlands. Our owned and leased facilities house general offices, sales offices, service locations, call centers and distribution centers. The size of our property portfolio as of December 31, 2025 was approximately 4.4 million square feet at an annual operating cost (lease costs and expenses) of approximately $110 million and was composed of 149 leased properties and 3 owned properties. We believe that our current facilities are suitable and adequate for our current business. Because of the interrelation of our business segments, each of the segments uses substantially all of these properties at least in part.

We have aggressively pursued portfolio reduction opportunities through lease terminations, subleases and consolidation of properties. Partially offsetting these reductions, in 2025, we executed strategic portfolio expansions in India, the Philippines and key relocations in the United States. As a result, the portfolio net reduction was approximately 0.2 million square feet during the year ended December 31, 2025. We will continue efforts to optimize our workforce location strategy.

## ITEM 3. LEGAL PROCEEDINGS

The information set forth under Note 15 – Contingencies and Litigation to the Consolidated Financial Statements in Part II, Item 8 to this 10-K is incorporated herein by reference.

## ITEM 4. MINE SAFETY DISCLOSURES

Not applicable.

# Part II

## ITEM 5. MARKET FOR THE REGISTRANT'S COMMON EQUITY, RELATED STOCKHOLDER MATTERS AND ISSUER PURCHASES OF EQUITY SECURITIES

### Stock Exchange Information

The common stock of Conduent trades on Nasdaq under the ticker "CNDT".

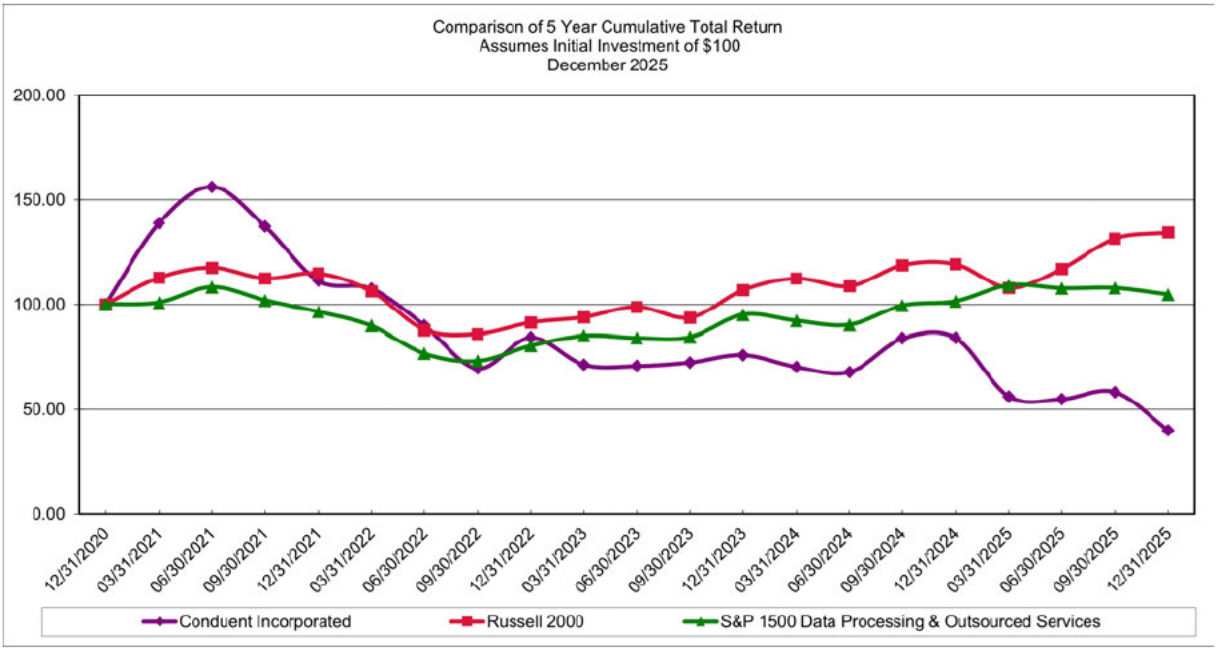
### Common Shareholders of Record

There were 10,626 shareholders of record as of January 31, 2026.

### Conduent Common Stock Dividends

We did not pay any dividends on our common stock in 2025. We intend to retain future earnings for use in the operation of our business and to fund future growth. We do not anticipate paying any dividends on our common stock for the foreseeable future.

### Performance Graph




### Purchases of Equity Securities by the Issuer and Affiliated Purchasers

Share repurchase activity during the three months ended December 31, 2025 was as follows:

| Period | Total Number of Shares Purchased[1] | Average Price Paid Per Share [2] | Total Number of Shares Purchased as a Part of Publicly Announced Plan | Approximate Dollar Value of Shares that May Yet Be Purchased Under Plan (in millions) |
|---|---|---|---|---|
| October 1-31, 2025 | 1,834,998 | $ 2.58 | 1,834,998 | $ 25 |
| November 1-30, 2025 | — | — | — | 25 |
| December 1-31, 2025 | — | — | — | 25 |
| **Total** | 1,834,998 | $ — | 1,834,998 | $ 25 |

(1) On May 20, 2025, the Board of Directors authorized a three-year share repurchase program, granting approval for the Company to repurchase up to $50 million of its common stock from time to time as market and business conditions warrant, including through open market purchases or Rule 10b5-1 trading plans.

(2) Average share price includes transaction commissions.

### Securities Authorized for Issuance Under Existing Equity Compensation Plans

Information about securities authorized for issuance under existing equity compensation plans is incorporated by reference from Item 12—Security Ownership of Certain Beneficial Owners and Management and Related Stockholder Matters.

## ITEM 6. [RESERVED]

## ITEM 7. MANAGEMENT'S DISCUSSION AND ANALYSIS OF FINANCIAL CONDITION AND RESULTS OF OPERATIONS

The following Management's Discussion and Analysis ("MD&A") is intended to provide a reader of our financial statements with a narrative from the perspective of management on our financial condition, results of operations, liquidity, and certain other factors that may affect our future results. Unless otherwise noted, transactions and other factors significantly impacting our financial condition, results of operations and liquidity are discussed in order of magnitude. Our MD&A is presented in seven sections:

- Overview;
- Financial Information;
- Metrics;
- Capital Resources and Liquidity;
- Critical Accounting Estimates and Policies;
- Recent Accounting Changes; and
- Non-GAAP Financial Measures.

This MD&A is provided as a supplement to, and should be read in conjunction with, our Consolidated Financial Statements and the accompanying notes in this Form 10-K for the year ended December 31, 2025. This MD&A provides additional information about our operations, current developments, financial condition, cash flows and results of operations.

The year-over-year comparisons in this MD&A are as of and for the years ended December 31, 2025 and 2024, unless stated otherwise. The discussion of 2023 items and related year-over-year comparisons as of and for the years ended December 31, 2024 and 2023 are found in Item 7 of Part II of our Form 10-K for the year ended December 31, 2024.

Throughout the MD&A, we refer to various notes to our Consolidated Financial Statements which appear in Item 8 of this Form 10-K, and the information contained in such notes is incorporated by reference into the MD&A in the places where such references are made.

### Overview

We deliver digital business solutions and services spanning the commercial, government and transportation spectrum – creating valuable outcomes for our clients and the millions of people who count on them. We leverage cloud computing, artificial intelligence ("AI"), machine learning, automation and advanced analytics to deliver mission-critical solutions. Through a dedicated global team of approximately 51,000 associates, process expertise and advanced technologies, our solutions and services digitally transform our clients' operations to enhance customer experiences, improve performance, increase efficiencies and reduce costs.

Headquartered in Florham Park, New Jersey, we have operations in 24 countries as of December 31, 2025. In 2025, approximately 16% of our revenue was generated outside the U.S.

Our reportable segments correspond to how we organize and manage the business and are aligned to the industries in which our clients operate. These three segments are:

- **Commercial** – Our Commercial segment provides business process services that span our clients' business processes end-to-end from the front-office to the back-office for a variety of commercial industries. These solutions are both cross-industry and industry-specific in nature. Across the Commercial segment, we operate on our clients' behalf to deliver mission-critical solutions and services to reduce costs, improve efficiencies and enable revenue growth for our clients and deliver better experiences for their consumers and employees.

- **Government** – Our Government segment provides government-centric services and solutions to U.S. federal, state, local and foreign governments for public assistance, healthcare programs and administration, transaction processing, eligibility and enrollment processing, payment services and case management. In this segment, we help governments respond to changing rules for eligibility and keep pace with increasing citizen expectations, modernize legacy technology systems, combat benefits fraud and adapt to an evolving regulatory environment.
- **Transportation** – Our Transportation segment provides government agencies and transportation authorities around the world with systems, support and revenue-generating solutions serving toll and fare collections as well as mobility and digital payments that help streamline operations and increase revenue to government and transportation agencies. With and expanded focus on sustainability and enhancing the quality of life for citizens and communities around the world, our solutions help reduce congestion and greenhouse emissions, while creating seamless travel experiences for consumers throughout transportation ecosystems.

### Executive Summary

Our emphasis on growth, quality, and efficiency, launched in 2020 and reinforced in our 2023 investor briefing, continued throughout 2025, the final year of our three-year plan. We executed against this strategy by focusing on targeted-growth areas within each business advancing the second phase of our portfolio rationalization strategy to improve our earnings profile and maintained a balanced capital allocation framework that included making internal investments in our solutions, pre-paying debt and repurchasing common shares.

We expect this approach will continue positioning Conduent to become a more agile company with the potential for improved margins, stronger free cash flow, and a more resilient capital structure.

### Significant 2025 Actions

- **Debt Refinancing** – In 2025, we successfully completed refinancing of the Company's revolving credit facility and paid off the remaining $82 million balance of the Company's Senior Secured Term Loan A ("Term Loan A"). Refer to Note 10 – Debt in the Consolidated Financial Statements for additional information.
- **Share Repurchases** – During the second, third and fourth quarters of 2025, we repurchased 9.2 million shares of our common stock for $25 million under the current $50 million Board-authorized share repurchase program.
- **Portfolio Rationalization** – We started executing the second phase of our portfolio rationalization plans, prioritizing assets that are capital-intensive or have a negative impact on our earnings profile; and during 2025, we received the remaining cash proceeds that were tied to previously announced divestitures.
- **AI Experience Center** – We launched the AI Experience Center to support client engagement and provide a structured environment for evaluating and demonstrating Conduent's AI-enabled capabilities.

### Significant 2024 Actions

- **Divestitures** – In 2024, we completed three divestitures as part of our portfolio rationalization strategy - the BenefitWallet Portfolio, the Curbside Management and Public Safety businesses and the Casualty Claims Solutions businesses. Refer to Note 4 – Divestitures in the Consolidated Financial Statements for additional information.
- **Debt Prepayment** – In 2024, we utilized a portion of the proceeds from the closing of our divestitures to voluntarily prepay all of the principal of the Term Loan B and a portion of the Term Loan A.
- **Icahn Share Repurchase** – During the second quarter of 2024, we entered into a purchase agreement with Carl C. Icahn and certain of his affiliates pursuant to which we purchased their entire holdings or an aggregate of approximately 38 million shares of our common stock. We utilized a portion of the proceeds from the closing of our divestitures to fund the purchase.
- **Share Repurchases** – In 2024, we completed our previously approved $75 million share repurchase program.

### Cyber Event

On January 13, 2025, the Company experienced an operational disruption and learned that a threat actor gained unauthorized access to a limited portion of the Company's environment (the "January 2025 Cyber Event"). Upon

detection, the Company activated its cybersecurity response plan with the help of external cybersecurity experts to contain, assess, and remediate the incident. The Company restored the affected systems and returned to normal operations within days, and in some cases, hours. The disruption did not have a material impact to the Company's operations.

As part of its ongoing investigation, the Company determined that the threat actor exfiltrated a set of files associated with a subset of the Company's clients. Due to the complexity of the files, the Company engaged cybersecurity data mining experts to conduct a detailed analysis of the affected files to identify the personal information contained therein. This detailed analysis confirmed that the data sets contained a significant number of individuals' personal information associated with our clients' end-users. Upon completion of this time intensive data analysis, the Company notified impacted clients concerning their affected end-users. The Company is working with affected clients to determine next steps as required by federal and state law, including individual and regulatory notifications that began in October 2025 and are anticipated to be concluded by early 2026. The Company monitors the dark web regularly and has no evidence of any personal information associated with this event being released on the dark web. The Company has also notified federal law enforcement authorities of the incident.

While the Company did not experience material impacts to its operating environment or costs from the event itself, the Company recorded a $25 million non-recurring charge in the first quarter of 2025 related to the event based on the notification requirements described above. We have made cash disbursements of $17 million through December 31, 2025 and expect to make an additional $8 million of cash disbursements during the first half of 2026 related to these notification requirements. Any notification expense in excess of these amounts up to the coverage limit are anticipated to be covered by the cyber insurance policy that the Company maintains. The Company may experience costs beyond notification, but is not able to determine or predict whether the ultimate costs beyond notifications could exceed any applicable coverage limit. See also Note 15 – Contingencies and Litigation to our Consolidated Financial Statements of Part II, Item 8 to this 10-K.

It is possible that future risks and uncertainties resulting from the January 2025 Cyber Event, including those related to impacted data, litigation, reputational harm, and regulatory actions, could adversely affect the Company's financial condition or results of operations. See also Part I, Item 1A (Risk Factors).

### Macroeconomic and Geopolitical Uncertainty

Given the nature of our business and our global operations, the effects of global macroeconomic and geopolitical uncertainty could have a materially adverse effect on our business, results of operations and financial condition.

## Financial Information

The section below provides a comparative discussion of our consolidated results of operations for the year ended December 31, 2025 and 2024. See Item 7. MD&A – Financial Information in our Annual Report on Form 10-K for the year ended December 31, 2024, for a comparative discussion of our consolidated results of operations between 2024 and 2023.

| | Year Ended December 31, | | 2025 vs. 2024 | |
|---|---|---|---|---|
| (in millions) | 2025 | 2024 | $ Change | % Change |
| Revenue | $ 3,042 | $ 3,356 | $ (314) | (9)% |
| **Operating Costs and Expenses** | | | | |
| Cost of services (excluding depreciation and amortization) | 2,490 | 2,730 | $ (240) | (9)% |
| Selling, general and administrative (excluding depreciation and amortization) | 412 | 455 | $ (43) | (9)% |
| Research and development (excluding depreciation and amortization) | 4 | 6 | (2) | (33)% |
| Depreciation and amortization | 194 | 204 | (10) | (5)% |
| Restructuring and related costs | 35 | 46 | (11) | (24)% |
| Interest expense | 48 | 75 | (27) | (36)% |
| Goodwill impairment | — | 28 | (28) | (100)% |
| (Gain) loss on divestitures and transaction costs, net | 11 | (696) | 707 | n/m |
| Litigation settlements (recoveries), net | (1) | 9 | (10) | n/m |
| Loss on extinguishment of debt | 1 | 8 | (7) | (88)% |
| Other (income) expenses, net | 8 | (13) | 21 | n/m |
| **Total Operating Costs and Expenses** | **3,202** | **2,852** | **350** | |
| **Income (Loss) Before Income Taxes** | (160) | 504 | (664) | |
| Income tax expense (benefit) | 10 | 78 | (68) | |
| **Net Income (Loss)** | **$ (170)** | **$ 426** | **$ (596)** | |

### Revenue

Revenue for 2025 decreased 9%, compared to the prior year, approximately 57% of which was due to the impact of the BenefitWallet Transfer and the sales of the Curbside Management and Public Safety Solutions and Casualty Claims Solutions businesses. In addition to the divestitures impact, lost business and lower volumes contributed to the decrease and were partially offset by new business ramp, higher equipment sales and positive impacts from a contract amendment with a customer in the Transportation segment.

### Cost of Services (excluding depreciation and amortization)

Cost of services for 2025 decreased 9%, compared to the prior year, primarily due to the impact of the BenefitWallet Transfer and the sales of the Curbside Management and Public Safety Solutions and Casualty Claims Solutions businesses. In addition to the divestitures impact, lower expenses on lower revenues and continued cost optimization initiatives across segments contributed to the decline.

### Selling, General and Administrative ("SG&A") (excluding depreciation and amortization)

SG&A for 2025 decreased 9%, compared to the prior year, primarily driven by a $9 million benefit from the recovery of legal costs from one of our insurance carriers related to the previously disclosed State of Texas matter that settled in February 2019 as well as cost efficiencies in our corporate functions. These were partially offset by $25 million of direct response costs related to the January 2025 Cyber Event.

### Depreciation and Amortization

Depreciation and amortization for 2025 decreased 5% compared to the prior year, primarily due to the sale of the Curbside Management and Public Safety Solutions and Casualty Claims Solutions businesses. This decrease was partially offset by increased amortization of deferred contract costs related to new projects that went live in 2025.

### Restructuring and Related Costs

We engage in a series of restructuring programs related to optimizing our employee base, reducing our real estate footprint, exiting certain activities, outsourcing certain internal functions, consolidating our data centers and engaging in other actions designed to reduce our cost structure and improve productivity. The following are the components of our Restructuring and related costs:

| | Year Ended December 31, | |
|---|---|---|
| (in millions, except headcount in whole numbers) | 2025 | 2024 |
| Severance and related costs | $ 18 | $ 21 |
| Contract Termination and other costs | 12 | 19 |
| Asset impairments | 5 | 6 |
| **Restructuring and Related Costs** | $ 35 | $ 46 |
| Reduction in headcount[1] | 1,500 | 600 |

(1) Relates to approximate headcount reductions worldwide associated with Severance and related costs.

Refer to Note 8 – Restructuring Programs and Related Costs to the Consolidated Financial Statements for additional information regarding our restructuring programs.

### Interest Expense

Interest expense represents interest on long-term debt and the amortization of debt issuance costs. The decrease in Interest expense for 2025, compared to the prior year, was primarily due to the 2024 voluntary prepayments of the entire Term Loan B balance outstanding and a portion of the Term Loan A balance with proceeds from divestitures. The remaining Term Loan A balance was repaid at the execution of Amendment No. 3 to the Credit Facility. Refer to Note 10 – Debt to the Consolidated Financial Statements for additional information.

### Goodwill Impairment

The goodwill impairment for 2024 is related to the write-down of the Transportation reporting unit's goodwill arising from the annual goodwill impairment test. Refer to Note 7 – Goodwill to the Consolidated Financial Statements for additional information on this impairment.

### (Gain) Loss on Divestitures and Transaction Costs

Our 2024 divestitures resulted in gains of $721 million. Additionally, we recorded a $3 million gain adjustment related to a prior year divestiture following the partial settlement of the Skyview matter. (Gain) loss on divestitures and transaction costs, net also includes professional fees and other costs associated with both consummated and non-consummated transactions totaling $9 million and $28 million in 2025 and 2024, respectively. Refer to Note 4 – Divestitures and Note 15 – Contingencies and Litigation to the Consolidated Financial Statements for additional information on these matters.

### Litigation Settlements (Recoveries), Net

Litigation settlements (recoveries), net for 2025 and 2024 were not material. Refer to Note 15 – Contingencies and Litigation to the Consolidated Financial Statements for additional information on these matters.

### Other (Income) Expenses, Net

Other (income) expenses, net for 2025 and 2024 primarily include interest income on cash investments, accounts receivable factoring fees and foreign currency transaction losses (gains). In 2025, interest income on invested cash was lower due to lower available cash and foreign currency transaction losses were higher due to unfavorable movements in foreign exchange rates, primarily the weakening of the U.S. dollar against certain foreign currencies during the year. In 2024, Other (income) expenses, net also included interest income of $8 million related to the partial settlement of the Skyview matter. Refer to Note 15 – Contingencies and Litigation in the Consolidated Financial Statements for additional information.

### Income Taxes

The 2025 effective tax rate was (6.1)%, compared to 15.5% for 2024. The 2025 rate was lower than the U.S. statutory rate of 21% primarily due to valuation allowances, geographic mix of income and discrete taxes. The 2024 rate was lower than the U.S. statutory rate of 21%, primarily due to favorable permanent differences from an internal reorganization and outside basis on a stock sale partially offset by non-deductible Transportation reporting unit goodwill impairment, tax reserves and geographic mix of income.

Excluding the impact of amortization, restructuring, divestitures, transaction costs, reserves for the Direct response costs - cyber event, valuation allowances and discrete tax items, the normalized effective tax rate for 2025 was 25.4%. The normalized effective tax rate for 2024 was 21.2% excluding the impact of the internal reorganization, divestitures, goodwill impairment, amortization of intangible assets, restructuring costs and certain discrete tax items. The 2025 rate is higher than the 2024 rate due to increased estimated tax credits and geographic mix of income.

On July 4, 2025, the One Big Beautiful Bill Act ("OBBBA") was signed into law in the U.S. The legislation contains certain provisions related to the full expensing of U.S. research and development costs and other depreciable property. The legislation also includes changes to the determination of the amount of U.S. interest expense that is deductible for U.S. tax purposes. The acceleration of deductions as a result of anticipated elections the Company will make for the current year following the OBBBA has increased current year net operating loss ("NOL"). The NOL has created a deferred tax asset that required a valuation allowance for U.S. GAAP purposes in 2025. The NOL can be carried forward indefinitely.

In 2021, the Organization for Economic Cooperation and Development released model rules for a 15% global minimum tax, known as Pillar Two. This alternative minimum tax is treated as a period cost beginning in 2024 and does not have a material impact on the Company's financial results of operations for the current period. The Company continues to monitor legislative developments, as well as additional guidance from countries that have enacted legislation.

### Operations Review of Segments

Our financial performance is based on Segment Profit (Loss) for the following three segments:

- Commercial,
- Government, and
- Transportation.

Divestitures include our BenefitWallet Portfolio and our Casualty Claims Solutions businesses (both of which were reclassified from our Commercial segment in 2024) and our Curbside Management and Public Safety Solutions businesses (which was reclassified from our Transportation segment in 2024).

Unallocated Costs includes IT infrastructure costs that are shared by multiple reportable segments, enterprise application costs and certain corporate overhead expenses not directly attributable or allocated to our reportable segments.

The section below provides a comparative discussion of our financial performance by segment between the years ended December 31, 2025 and 2024. See Item 7. MD&A - Operations Review of Segments in our Annual Report on Form 10-K for the year ended December 31, 2024 for a comparative discussion of our financial performance by segment between the years ended December 31, 2024 and 2023.

## Segment Performance Review

| (in millions) | Commercial | Government | Transportation | Divestitures | Unallocated Costs | Total |
|---|---|---|---|---|---|---|
| | Reportable Segments | | | | | |
| **Year Ended Dec 31, 2025** | | | | | | |
| Total Revenue | $ 1,511 | $ 922 | $ 609 | $ — | $ — | $ 3,042 |
| Segment profit (Loss) | $ 66 | $ 175 | $ (12) | $ — | $ (285) | $ (56) |
| Segment depreciation and amortization | $ 88 | $ 46 | $ 30 | $ — | $ 31 | $ 195 |
| Adjusted EBITDA[1] | $ 154 | $ 221 | $ 18 | $ — | $ (229) | $ 164 |
| | | | | | | |
| % of Total Revenue | 49.7 % | 30.3 % | 20.0 % | — % | — % | 100.0 % |
| Adjusted EBITDA Margin[1][2] | 10.2 % | 24.0 % | 3.0 % | — % | — % | 5.4 % |
| | | | | | | |
| **Year Ended Dec 31, 2024** | | | | | | |
| Total Revenue | $ 1,606 | $ 984 | $ 586 | $ 180 | $ — | $ 3,356 |
| Segment profit (Loss) | $ 77 | $ 166 | $ (25) | $ 35 | $ (287) | $ (34) |
| Segment depreciation and amortization | $ 92 | $ 44 | $ 25 | $ 13 | $ 28 | $ 202 |
| Adjusted EBITDA[1] | $ 169 | $ 210 | $ — | $ 48 | $ (255) | $ 172 |
| | | | | | | |
| % of Total Revenue | 47.9 % | 29.3 % | 17.4 % | 5.4 % | — % | 100.0 % |
| Adjusted EBITDA Margin[1][2] | 10.5 % | 21.3 % | — % | 26.7 % | — % | 5.1 % |

[1] Refer to "Non-GAAP Financial Measures" section for an explanation of the non-GAAP financial measure.
[2] Adjusted EBITDA Margin is calculated as Adjusted EBITDA divided by Total Revenue.

| (in millions) | Year Ended December 31, | |
|---|---|---|
| **Adjusted EBITDA and Segment Profit (Loss) Reconciliation to Income (Loss) Before Income Taxes** | 2025 | 2024 |
| **Adjusted EBITDA** | $ 164 | $ 172 |
| Reconciling items: | | |
| Segment depreciation and amortization | (195) | (202) |
| Direct response costs - cyber event | (25) | — |
| Other adjustments[1] | — | (4) |
| **Segment Pre-Tax Income (Loss)** | $ (56) | $ (34) |
| Reconciling items: | | |
| Amortization of acquired intangible assets | (2) | (5) |
| Restructuring and related costs | (35) | (46) |
| Interest expense | (48) | (75) |
| Loss on extinguishment of debt | (1) | (8) |
| Goodwill impairment | — | (28) |
| Gain (loss) on divestitures and transaction costs, net | (11) | 696 |
| Litigation (settlements) recoveries, net | 1 | (9) |
| Other income (expenses), net | (8) | 13 |
| **Income (Loss) Before Income Taxes** | $ (160) | $ 504 |

[1] The 2024 amount represents a termination for convenience fee related to the termination of Convergint as a subcontractor for our State of Victoria contract and is reported in Cost of Services on the Consolidated Statements of Income.

## Commercial Segment

*Revenue*

Commercial segment revenue for 2025 decreased by 6%, compared to the prior year, driven by contract losses and lower volumes, partially offset by new business ramps and multi-year licensing agreements with existing customers.

*Segment Profit and Adjusted EBITDA*

Commercial segment profit and Adjusted EBITDA for 2025 decreased compared to the prior year primarily due to the revenue drivers noted above and higher fixed technology overhead, partially offset by cost efficiencies and the impact of lower depreciation due to the prior year write-off of internal use software and fully amortized assets.

### Government Segment

*Revenue*

Government segment revenue for 2025 decreased, compared to the prior year, primarily due to contract losses, lower volumes and the impacts from a U.S. federal government shutdown during the fourth quarter of 2025, as well as the completion or extension of several implementations. These declines were partially offset by ramp of new business.

*Segment Profit and Adjusted EBITDA*

Government segment profit, Adjusted EBITDA and Adjusted EBITDA margin for 2025 increased compared to the prior year. Government segment Adjusted EBITDA margin increased by 270 basis points compared to the prior year, primarily due to cost efficiencies and lower expenses resulting from AI-enabled fraud prevention activities in our Government Services business.

### Transportation Segment

*Revenue*

Transportation revenue for 2025 increased compared to the prior year, primarily driven by a contract amendment with a Transit Solutions customer, increased volumes and favorable exchange rate movements. These increases were partially offset by the non-retained portion of a Road Usage Charging contract, and lower activity across certain smaller projects.

*Segment Profit and Adjusted EBITDA*

Transportation segment profit and Adjusted EBITDA for 2025 increased compared to the prior year due to the revenue drivers mentioned above and the absence of costs to transition the non-retained portion of a Road Usage Charging contract.

### Divestitures

*Revenue, Segment Profit (Loss) and Adjusted EBITDA*

The decrease in revenue, segment profit and Adjusted EBITDA for 2025 as compared to the prior year was due to the transfer of the BenefitWallet Portfolio and the sales of the Curbside Management and Public Safety Solutions businesses and Casualty Claims Solutions businesses in 2024.

### Unallocated Costs

Unallocated Costs for 2025 decreased compared to the prior year primarily due to a $9 million recovery of legal costs from one of our insurance carriers related to the previously disclosed State of Texas matter that settled in February 2019, as well as cost efficiencies in our corporate functions. These factors were partially offset by $25 million of direct response costs related to the January 2025 Cyber Event and increase in medical expenses resulting from higher claims costs.

## Metrics

We use metrics to evaluate our business, determine the allocation of our resources, make decisions regarding corporate strategies and evaluate forward-looking projections and trends affecting our business. We disclose these metrics to provide transparency in our performance trends. We present certain key metrics, including Signings and Net ARR Activity below. The metrics for all periods presented below have been recast to remove the activity related to the BenefitWallet Portfolio, the Casualty Claims Solutions business and the Curbside Management and Public Safety Solutions businesses.

***Signings***

Signings are defined as estimated future revenues from contracts signed during the period, including renewals of existing contracts. Total Contract Value ("TCV") is the estimated total contractual revenue related to signed contracts. TCV signings is defined as estimated future revenues from contracts signed during the period, including renewals of existing contracts. Due to the inconsistency of when existing contracts end, quarterly and yearly comparisons are not a good measure of renewal performance. New business Annual Contract Value ("ACV") is calculated as TCV divided by the contract term, in months, multiplied by 12 for an annual measure.

Signing information for the years ended December 31, 2025 and 2024 is as follows:

| | Year Ended December 31, | | 2025 vs. 2024 | |
|---|---|---|---|---|
| (in millions) | 2025 | 2024 | $ Change | % Change |
| New business ACV | $ 517 | $ 485 | $ 32 | 7 % |
| New business TCV | $ 1,118 | $ 969 | $ 149 | 15 % |
| Renewals TCV | 1,293 | 1,657 | (364) | (22)% |
| Total Signings | $ 2,411 | $ 2,626 | $ (215) | (8)% |
| New business annual recurring revenue (ARR) signings[1] | $ 237 | $ 228 | $ 9 | 4 % |
| New business non-recurring revenue (NRR) signings[2] | $ 327 | $ 309 | $ 18 | 6 % |

(1) Recurring revenue signings are for new business contracts longer than one year.
(2) Non-recurring revenue signings are for contacts shorter than one year.

The total new business pipeline at the end of December 31, 2025 and 2024 was $3.2 billion and $3.1 billion, respectively. Total new business pipeline is defined as total new business ACV pipeline of deals at or beyond the qualified prospect stage. Beginning in the first quarter of 2025, we transitioned our measure of sales pipeline from TCV to ACV to align with our primary sales metric and have recast all prior period comparatives to reflect this change. This extends past the next twelve-month period to include total pipeline, excluding the impact of divested business as required. New business pipeline levels were stable year over year and were not a primary driver of period-over-period revenue or Net ARR performance.

***Net ARR Activity***

Net ARR Activity is a metric that is defined as Projected Annual Recurring Revenue ("ARR") for contracts signed in the prior 12 months, less the annualized impact of any client losses, contractual volume and price changes, and other known impacts for which the Company was notified in that same time period, which could positively or negatively impact results. The metric annualizes the net impact to revenue. Timing of revenue impact varies and may not be realized within the forward 12-month timeframe. The metric is for indicative purposes only. This metric excludes non-recurring revenue signings. This metric is not indicative of any specific 12-month timeframe. Net ARR results during the year, including in the second, third and fourth quarters, were primarily influenced by the cadence of renewals and client losses, rather than new-business performance.

The Net ARR Activity metric for the trailing twelve months for each of the prior five quarters was as follows:

| (in millions) | Net ARR activity metric |
|---|---|
| December 31, 2025 | $ (8) |
| September 30, 2025 | 25 |
| June 30, 2025 | 63 |
| March 31, 2025 | 116 |
| December 31, 2024 | 92 |

## Capital Resources and Liquidity

As of December 31, 2025 and 2024, total cash and cash equivalents were $233 million (of which approximately $115 million was cash in foreign locations) and $366 million (of which approximately $140 million was cash in foreign locations), respectively. We also have a $357 million Revolving Credit Facility (reducing to $187 million in October 2026) for our various cash needs, of which $109 million has been utilized for borrowings and $25 million has been utilized for letters of credit as of December 31, 2025. The amount of borrowings outstanding under the Revolving Credit Facility at each quarter-end may be limited by our leverage covenant. In January 2026, the Company borrowed an additional $25 million under the Revolving Credit Facility for working capital purposes.

As of December 31, 2025, there was a total of $520 million of outstanding borrowings under our Senior Notes, none of which was due within one year. Additionally, as of December 31, 2025, we had $22 million of finance lease and other debt due within one year. We have the ability and intent to refinance the amount outstanding under our Revolving Credit Facility on a long-term basis; therefore all amounts outstanding as of December 31, 2025 are classified as long-term on our Consolidated Balance Sheets. Refer to Note 10 – Debt to the Consolidated Financial Statements for additional information regarding our debt.

To provide financial flexibility and finance certain investments and projects, we may continue to utilize external financing arrangements. However, we believe that our cash on hand, projected cash flow from operations, sound balance sheet and our Revolving Credit Facility will continue to provide sufficient financial resources to meet our expected business obligations for at least the next twelve months.

### Cash Flow Analysis

The following summarizes our cash flows for the two years ended December 31, 2025, as reported in our Consolidated Statements of Cash Flows in the accompanying Consolidated Financial Statements:

| | Year Ended December 31, | | Change |
|---|---|---|---|
| (in millions) | 2025 | 2024 | 2025 vs. 2024 |
| Net cash provided by (used in) operating activities | $ (73) | $ (50) | $ (23) |
| Net cash provided by (used in) investing activities | (28) | 795 | (823) |
| Net cash provided by (used in) financing activities | (39) | (877) | 838 |

### Operating Activities

The net increase in cash flow used in operating activities of $23 million was primarily related to unfavorable working capital changes and cash outflows related to the January 2025 Cyber Event, partially offset by lower cash tax outflows and lower net interest payments.

### Investing Activities

The decrease in cash provided by investing activities of $823 million was primarily due to the proceeds from our divestitures of $830 million and proceeds from the settlement of the Skyview matter related to notes receivable of $21 million in 2024. In addition, there was a planned increase in capital spending in the current year of $25 million. The 2025 period includes $50 million of cash received related to the non-interest-bearing note from the Curbside Disposal Group divestiture.

### Financing Activities

The decrease in cash used in financing activities was mainly driven by the $642 million early repayment of Term Loan B and Term Loan A in 2024 utilizing funds received from our divestitures. In addition, in 2024 $132 million was utilized to purchase all the common shares owned by the Icahn Parties. The 2025 period includes a $25 million drawdown on our revolving line of credit for working capital purposes.

### Sales of Accounts Receivable

The net impact from the sales of accounts receivable on net cash provided by (used in) operating activities for the years ended December 31, 2025, 2024 and 2023 was $(18) million, $7 million and $(4) million, respectively. The net impact from the sales of accounts receivable represents the difference between current and prior year fourth quarter accounts receivable sales adjusted for the effects of collections prior to the end of the year.

### Financial Instruments

Refer to Note 11 – Financial Instruments to the Consolidated Financial Statements for additional information.

### Material Cash Requirements from Contractual Obligations

We believe our balances of cash and cash equivalents, which totaled $233 million as of December 31, 2025, along with cash generated by operations and amounts available for borrowing under our Revolving Credit Facility, will be sufficient to satisfy our cash requirements over the next 12 months and beyond.

At December 31, 2025, our material cash requirements include the following contractual and other obligations.

***Debt***

As of December 31, 2025, we had total outstanding debt, including finance leases, with floating and fixed rates totaling $691 million, of which $22 million was due within 12 months. Future interest payments associated with this debt, which has maturities through 2029, are forecast to be $162 million, of which $44 million is due within 12 months. Refer to Note 10 – Debt to the Consolidated Financial Statements for additional information.

***Operating Leases***

In the ordinary course of business, we enter operating lease arrangements for certain equipment and facilities. As of December 31, 2025, total fixed lease payables were $182 million, of which $61 million was due within 12 months. Refer to Note 6 – Leases to the Consolidated Financial Statements for additional information.

***Estimated Purchase Commitments***

We have committed to purchasing certain materials and services to support our operations. The total of these commitments was $603 million as of December 31, 2025, of which $202 million is due within the next 12 months.

### Other Contingencies and Commitments

As more fully discussed in Note 15 – Contingencies and Litigation to the Consolidated Financial Statements, we are involved in a variety of claims, lawsuits, investigations and proceedings concerning: securities law; governmental entity contracting, servicing and procurement law; intellectual property law; employment law; the Employee Retirement Income Security Act ("ERISA"); data privacy and cybersecurity laws; and other laws and regulations. In addition, guarantees, indemnifications and claims may arise during the ordinary course of business from relationships with suppliers and customers. Nonperformance under a contract including a guarantee, indemnification or claim could trigger an obligation of the Company.

We determine whether an estimated loss from a contingency should be accrued by assessing whether a loss is deemed probable and can be reasonably estimated. Should developments in any of these areas cause a change in our determination as to an unfavorable outcome and result in the need to recognize a material accrual, or should any of these matters result in a final adverse judgment or be settled for significant amounts, they could have a material adverse effect on our results of operations, cash flows and financial position in the period or periods in which such change in determination, judgment or settlement occurs. Refer to Note 15 – Contingencies and Litigation to the Consolidated Financial Statements for additional information.

### Off-Balance Sheet Arrangements

As of December 31, 2025, we do not believe we have any off-balance sheet arrangements that have, or are reasonably likely to have, a material current or future effect on financial condition, changes in financial condition, revenues or expenses, results of operations, liquidity, capital expenditures or capital resources.

In addition, refer to the preceding discussion of the Company's contractual cash obligations and other commercial commitments and Note 15 – Contingencies and Litigation to the Consolidated Financial Statements for additional information regarding contingencies, guarantees and indemnifications.

## Critical Accounting Estimates and Policies

The preparation of financial statements in conformity with accounting principles generally accepted in the United States of America ("U.S. GAAP") requires us to make estimates and assumptions in certain circumstances that affect amounts reported in the accompanying Consolidated Financial Statements and notes thereto. In preparing our Consolidated Financial Statements, we have made our best estimates and judgments of certain amounts included in the Consolidated Financial Statements giving due consideration to materiality. However, application of these accounting policies involves the exercise of judgment and use of assumptions as to future uncertainties and, as a result, actual results could differ from these estimates. Senior management has discussed the development and selection of critical accounting policies, estimates and related disclosures included herein with the Audit Committee of the Board of Directors. We consider these as critical to understanding our Consolidated Financial Statements, as their application places the most significant demands on management's judgment, since financial reporting results rely on estimates of the effects of matters that are inherently uncertain. In instances where different estimates could have reasonably been used, we disclose the impact of these different estimates on our operations. In certain instances, the accounting rules are prescriptive; therefore, it would not have been possible to reasonably use different estimates. Changes in assumptions and estimates are reflected in the period in which they occur. The impact of such changes could be material to our results of operations and financial condition in any quarterly or annual period.

Specific risks associated with these critical accounting policies are discussed in MD&A, where such policies affect our reported and expected financial results. For a detailed discussion of the application of these and other accounting policies, refer to Note 1 – Basis of Presentation and Summary of Significant Accounting Policies to the Consolidated Financial Statements.

### Revenue Recognition

Application of the accounting principles in U.S. GAAP related to the measurement and recognition of revenue requires us to make judgments and estimates. Complex arrangements with nonstandard terms and conditions may require significant contract interpretation to determine the appropriate accounting. Refer to Note 1 – Basis of Presentation and Summary of Significant Accounting Policies and Note 2 – Revenue to the Consolidated Financial Statements for additional information regarding our revenue recognition policies.

### Goodwill

Goodwill is not amortized but rather tested for impairment annually, or more frequently if an event or circumstance indicates that impairment may have been incurred. Events or circumstances that might indicate an interim evaluation is warranted include, among other things, unexpected adverse business conditions, macro and reporting unit specific economic factors, supply costs, unanticipated adverse events or conditions impacting revenues, cash flows or profitability, unanticipated competitive activities and acts by governments and courts. Refer to Note 1 – Basis of Presentation and Summary of Significant Accounting Policies and Note 7 – Goodwill to the Consolidated Financial Statements for additional information regarding our goodwill policies.

Application of the interim and annual goodwill impairment test requires judgment, including the identification of reporting units, assignment of assets and liabilities to reporting units, assignment of goodwill to reporting units and the assessment of the fair value of each reporting unit. We currently have three reporting units which correlate to our three reportable segments: Commercial, Government and Transportation.

***Annual Goodwill Impairment Evaluation***

Our annual quantitative impairment test of goodwill was performed as of October 1, 2025.

Goodwill is tested for impairment using a qualitative assessment and/or a quantitative assessment. In our quantitative assessment, we estimate the fair value of each reporting unit by weighting the results from the Income Approach (discounted cash flow methodology) and Market Approach. The Income Approach utilizes a discounted cash flow analysis based upon the forecasted future business results of its reporting units. The Market Approach utilizes the guideline public company method. These valuation approaches require significant judgment and consider several factors that include, but are not limited to, expected future cash flows, growth rates and discount rates and comparable multiples from publicly traded companies in our industry. In addition, we are required to make certain assumptions and estimates regarding the current economic environment, industry factors and the future profitability of our businesses.

When performing our discounted cash flow analysis for each reporting unit, we incorporate the use of projected financial information and discount rates that are developed using market participant-based assumptions. The cash-flow projections are based on three-year financial forecasts developed by management that include revenue and expense projections, restructuring activities, capital spending trends and investment in working capital to support anticipated revenue growth or other changes in the business. The selected discount rates consider the risk and nature of the respective reporting units' cash flows, appropriate capital structure and rates of return that market participants would require to invest their capital in our reporting units.

We believe these assumptions are appropriate and reflect our forecasted long-term business model and consider our historical results as well as the current economic environment and markets that we serve. The most significant assumptions used in the goodwill analysis relate to discount rates and long-term organic growth rates.

Based on our quantitative assessments, we concluded that the fair value of our Government reporting unit exceeded its carrying value and, accordingly, we did not record any goodwill impairment charge as a result of our annual quantitative impairment test of goodwill for this reporting unit. If we used different assumptions for discount rates or long-term organic growth rates in this annual assessment, our calculated fair values of our Government reporting unit could be higher or lower which could result in a goodwill impairment.

### Income Taxes

We are subject to income taxes in the United States and numerous foreign jurisdictions. The determination of our provision for income taxes requires significant judgment, the use of estimates and the interpretation and application of complex tax laws. Our provision is based on nonrecurring events as well as recurring factors, including the taxation of foreign income. In addition, our provision will change based on discrete or other nonrecurring events such as audit settlements, tax law changes, changes in valuation allowances and other factors, that may not be predictable. In the event there is a significant unusual or one-time item recognized in our operating results, the taxes attributable to that item would be separately calculated and recorded at the same time as the unusual or one-time item.

We record the estimated future tax effects of temporary differences between the tax bases of assets and liabilities and amounts reported in our Consolidated Balance Sheets, as well as operating loss and tax credit carryforwards. We follow very specific and detailed guidelines in each tax jurisdiction regarding the recoverability of any tax assets recorded in our Consolidated Balance Sheets and provide valuation allowances as required. We regularly review our deferred tax assets for recoverability considering historical profitability, projected future taxable income, the expected timing of the reversals of existing temporary differences and tax planning strategies. Gross deferred tax assets of $310 million and $241 million had valuation allowances of $151 million and $95 million at December 31, 2025 and 2024, respectively.

We are subject to ongoing tax examinations and assessments in various jurisdictions. Accordingly, we may incur additional tax expense based upon our assessment of the more-likely-than-not outcomes of such matters. In addition, when applicable, we adjust previously recorded tax expense to reflect examination results. Our ongoing assessments of the more-likely-than-not outcomes of examinations and related tax positions require judgment and can materially increase or decrease our effective tax rate, as well as impact our operating results. Unrecognized tax benefits were $19 million, $19 million and $10 million at December 31, 2025, 2024 and 2023, respectively.

Refer to Note 14 – Income Taxes to the Consolidated Financial Statements for additional information regarding deferred income taxes and unrecognized tax benefits.

### Loss Contingencies

We are currently involved in various claims and legal proceedings. At least quarterly, we review the status of each significant matter and assess its potential financial exposure considering all available information including, but not limited to, the impact of negotiations, settlements, rulings, advice of legal counsel and other updated information and events pertaining to a particular matter. If the potential loss from any claim or legal proceeding is considered probable and the amount can be reasonably estimated, we accrue a liability for the estimated loss. The estimated losses are recorded within Litigation settlements (recoveries), net in the Company's income statement. Significant judgment is required in both the determination of probability and the determination as to whether an exposure is reasonably estimable. Because of uncertainties related to these matters, accruals are based only on the best information available at the time. As additional information becomes available, we reassess the potential liability related to pending claims and litigation and may revise estimates. These revisions in the estimates of the potential liabilities could have a material impact on the results of operations and financial position. Our policy is to expense legal defense costs related to such matters as incurred. These costs are recorded within Selling, general and administrative expenses in the Company's income statement. Any insurance recoveries for litigation settlements and defense costs are recorded when such recoveries are deemed probable and collectability is reasonably assured. Such recoveries are recorded in the same financial statement line as the related costs to which the recoveries relate.

Refer to Note 15 – Contingencies and Litigation to the Consolidated Financial Statements for additional information regarding loss contingencies.

## Recent Accounting Changes

See Note 1 – Basis of Presentation and Summary of Significant Accounting Policies for information on accounting standards adopted during the current year, as well as recently issued accounting standards not yet required to be adopted and the expected impact of the adoption of these accounting standards. To the extent we believe the adoption of new accounting standards has had or will have a material impact on our consolidated results of operations, financial condition or liquidity, we also discuss the impact in the applicable section(s) of this MD&A.

## Non-GAAP Financial Measures

We report our financial results in accordance with U.S. GAAP. In addition, within this Form 10-K Part II Item 7 we have discussed our financial results using non-GAAP measures.

We believe these non-GAAP measures allow investors to better understand the trends in our business and to better understand and compare our results. Accordingly, we believe it is necessary to adjust several reported amounts, determined in accordance with U.S. GAAP, to exclude the effects of certain items as well as their related tax effects. Management believes that these non-GAAP financial measures provide an additional means of analyzing the results of the current period compared to the corresponding prior period. However, these non-GAAP financial measures should be viewed in addition to, and not as a substitute for, the Company's reported results prepared in accordance with U.S. GAAP. Our non-GAAP financial measures are not meant to be considered in isolation or as a substitute for comparable U.S. GAAP measures and should be read only in conjunction with our Consolidated Financial Statements prepared in accordance with U.S. GAAP. Our management regularly uses our non-GAAP financial measures internally to understand, manage and evaluate our business and make operating decisions, and providing such non-GAAP financial measures to investors allows for a further level of transparency as to how management reviews and evaluates our business results and trends. These non-GAAP measures are among the primary factors management uses in planning for and forecasting future periods. Compensation of our executives is based in part on the performance of our business based on certain of these non-GAAP measures.

A reconciliation of the non-GAAP financial measures Adjusted EBITDA and Adjusted EBITDA Margin to the most directly comparable financial measures calculated and presented in accordance with U.S. GAAP are provided in the Segment Performance Review above.

### Adjusted EBITDA and Adjusted EBITDA Margin

We use Adjusted EBITDA and Adjusted EBITDA Margin as an additional way of assessing certain aspects of our operations that, when viewed with the U.S. GAAP results and the accompanying reconciliations to corresponding U.S. GAAP financial measures, provide a more complete understanding of our on-going business. Adjusted EBITDA

Margin is Adjusted EBITDA divided by revenue. Adjusted EBITDA represents income (loss) before interest, income taxes, depreciation and amortization and contract inducement amortization adjusted for the following items:

- Amortization of acquired intangible assets. The amortization of acquired intangible assets is driven by acquisition activity, which can vary in size, nature and timing as compared to other companies within our industry and from period to period.
- Restructuring and related costs. Restructuring and related costs include restructuring and asset impairment charges as well as costs associated with our strategic transformation program.
- Goodwill impairment. This represents goodwill impairment charges arising from annual or interim goodwill testing.
- (Gain) loss on divestitures and transaction costs. Represents (gain) loss on divested businesses and transaction costs.
- Litigation settlements (recoveries), net represents settlements or recoveries for various matters subject to litigation.
- Loss on extinguishment of debt. This represents write-off of debt issuance costs related to prepayments of debt.
- Direct response costs - cyber event. This represents costs related to investigating, remediating and responding to the January 2025 Cyber Event.
- Other charges (credits). This includes Other (income) expenses, net on the Consolidated Statements of Income (loss) and other adjustments.

Adjusted EBITDA is not intended to represent cash flows from operations, operating income (loss) or net income (loss) as defined by U.S. GAAP as indicators of operating performance. Management cautions that amounts presented in accordance with Conduent's definition of Adjusted EBITDA and Adjusted EBITDA Margin may not be comparable to similar measures disclosed by other companies because not all companies calculate Adjusted EBITDA and Adjusted EBITDA Margin in the same manner.

# ITEM 7A. QUANTITATIVE AND QUALITATIVE DISCLOSURES ABOUT MARKET RISK

## Market Risk

We are exposed to market risk from foreign currency exchange rates, which could affect operating results, financial position and cash flows. We manage our exposure to this market risk through our regular operating and financing activities and, when appropriate, using derivative financial instruments. We utilized derivative financial instruments to hedge economic exposures, as well as reduce earnings and cash flow volatility resulting from shifts in market rates. We also hedge the cost to fund material non-dollar entities by buying currencies periodically in advance of the funding date. This is accounted for using derivative accounting.

Recent market events have not caused us to materially modify or change our financial risk management strategies with respect to our exposures to foreign currency risk. Refer to Note 11 – Financial Instruments to the Consolidated Financial Statements for additional discussion on our financial risk management.

## Foreign Exchange Risk Management

Assuming a 10% appreciation or depreciation in foreign currency exchange rates from the quoted foreign currency exchange rates at December 31, 2025, the potential change in the fair value of foreign currency-denominated assets and liabilities in each entity would not be significant because all material currency asset and liability exposures were economically hedged as of December 31, 2025. A 10% appreciation or depreciation of the U.S. Dollar against all currencies from the quoted foreign currency exchange rates at December 31, 2025 would have an impact on our cumulative translation adjustment portion of equity of approximately $39 million. The net amount invested in foreign subsidiaries and affiliates, primarily in the U.K. and Europe, and translated into U.S. Dollars using the year-end exchange rates, was approximately $393 million at December 31, 2025.

## Interest Rate Risk Management

The consolidated weighted-average interest rates related to our total debt for 2025 approximated 6.20% for the Senior Notes and 8.13% for finance lease obligations. As of December 31, 2025, we had $109 million of borrowings outstanding under our Revolving Credit Facility, with a weighted average interest rate of 6.58%. As of December 31, 2025, $109 million of our total debt of $691 million carried variable interest rates. The fair values of our fixed rate financial instruments are sensitive to changes in interest rates and at December 31, 2025, a 10% increase in market interest rates would decrease the fair values of such financial instruments by approximately $15 million. A 10% decrease in market interest rates would increase the fair values of such financial instruments by approximately $15 million.

## ITEM 8. FINANCIAL STATEMENTS AND SUPPLEMENTARY DATA

**Report of Independent Registered Public Accounting Firm**

To the Board of Directors and Shareholders of Conduent Incorporated

***Opinions on the Financial Statements and Internal Control over Financial Reporting***

We have audited the accompanying consolidated balance sheets of Conduent Incorporated and its subsidiaries (the "Company") as of December 31, 2025 and 2024, and the related consolidated statements of income (loss), of comprehensive income (loss), of shareholders' equity and of cash flows for each of the three years in the period ended December 31, 2025, including the related notes and schedule of valuation and qualifying accounts for each of the three years in the period ended December 31, 2025 appearing under Item 15(a)(2) (collectively referred to as the "consolidated financial statements"). We also have audited the Company's internal control over financial reporting as of December 31, 2025, based on criteria established in Internal Control - Integrated Framework (2013) issued by the Committee of Sponsoring Organizations of the Treadway Commission (COSO).

In our opinion, the consolidated financial statements referred to above present fairly, in all material respects, the financial position of the Company as of December 31, 2025 and 2024, and the results of its operations and its cash flows for each of the three years in the period ended December 31, 2025 in conformity with accounting principles generally accepted in the United States of America. Also in our opinion, the Company maintained, in all material respects, effective internal control over financial reporting as of December 31, 2025, based on criteria established in Internal Control - Integrated Framework (2013) issued by the COSO.

***Basis for Opinions***

The Company's management is responsible for these consolidated financial statements, for maintaining effective internal control over financial reporting, and for its assessment of the effectiveness of internal control over financial reporting, included in Management's Report on Internal Control over Financial Reporting appearing under Item 9A. Our responsibility is to express opinions on the Company's consolidated financial statements and on the Company's internal control over financial reporting based on our audits. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) (PCAOB) and are required to be independent with respect to the Company in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audits in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the consolidated financial statements are free of material misstatement, whether due to error or fraud, and whether effective internal control over financial reporting was maintained in all material respects.

Our audits of the consolidated financial statements included performing procedures to assess the risks of material misstatement of the consolidated financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the consolidated financial statements. Our audits also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the consolidated financial statements. Our audit of internal control over financial reporting included obtaining an understanding of internal control over financial reporting, assessing the risk that a material weakness exists, and testing and evaluating the design and operating effectiveness of internal control based on the assessed risk. Our audits also included performing such other procedures as we considered necessary in the circumstances. We believe that our audits provide a reasonable basis for our opinions.

***Definition and Limitations of Internal Control over Financial Reporting***

A company's internal control over financial reporting is a process designed to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles. A company's internal control over financial reporting includes those policies and procedures that (i) pertain to the maintenance of records that, in reasonable detail, accurately and fairly reflect the transactions and dispositions of the assets of the company; (ii) provide reasonable assurance that transactions are recorded as necessary to permit preparation of financial statements in accordance with generally accepted accounting principles, and that receipts and expenditures of the company are being made

only in accordance with authorizations of management and directors of the company; and (iii) provide reasonable assurance regarding prevention or timely detection of unauthorized acquisition, use, or disposition of the company's assets that could have a material effect on the financial statements.

Because of its inherent limitations, internal control over financial reporting may not prevent or detect misstatements. Also, projections of any evaluation of effectiveness to future periods are subject to the risk that controls may become inadequate because of changes in conditions, or that the degree of compliance with the policies or procedures may deteriorate.

***Critical Audit Matters***

The critical audit matter communicated below is a matter arising from the current period audit of the consolidated financial statements that was communicated or required to be communicated to the audit committee and that (i) relates to accounts or disclosures that are material to the consolidated financial statements and (ii) involved our especially challenging, subjective, or complex judgments. The communication of critical audit matters does not alter in any way our opinion on the consolidated financial statements, taken as a whole, and we are not, by communicating the critical audit matter below, providing a separate opinion on the critical audit matter or on the accounts or disclosures to which it relates.

*Revenue Recognition for Certain Revenue*

As described in Notes 1 and 2 to the consolidated financial statements, the Company's total revenue was $3,042 million for the year ended December 31, 2025, of which a significant portion relates to certain revenue. Typically, the Company's contracts include performance obligation(s) to stand-ready on a daily or monthly basis to provide services to the customers. Under a stand-ready obligation, the evaluation of the nature of the Company's performance obligation is focused on each time increment rather than the underlying activities. Accordingly, the promise to stand-ready is accounted for as a single-series performance obligation. Once management determines the performance obligations, management determines the transaction price, which is based on fixed and/or variable consideration. The Company typically satisfies its performance obligations over time as the services are provided. A time-elapsed output method is used to measure progress because the nature of the Company's promise is a stand-ready service and efforts are expended evenly throughout the period.

The principal consideration for our determination that performing procedures relating to revenue recognition for certain revenue is a critical audit matter is a high degree of auditor effort in performing procedures and evaluating audit evidence related to the Company's revenue recognition for certain revenue.

Addressing the matter involved performing procedures and evaluating audit evidence in connection with forming our overall opinion on the consolidated financial statements. These procedures included testing the effectiveness of controls relating to the revenue recognition process. These procedures also included, among others (i) testing revenue recognized, on a sample basis, by (a) obtaining and inspecting source documents, such as contracts, invoices, evidence of satisfaction of performance obligations, and where applicable, cash receipts, (b) where applicable, confirming services provided with the customer when payment has not been received for invoices, and (c) recalculating revenue recognized and (ii) confirming, on a sample basis, outstanding customer invoice balances as of December 31, 2025 and for confirmations not returned, and for invoices which have been paid, obtaining and inspecting subsequent cash receipts, or for invoices not yet paid, obtaining and inspecting source documents, such as contracts, invoices, and where applicable, evidence of satisfaction of performance obligations.

/s/ PricewaterhouseCoopers LLP

New York, New York
February 19, 2026

We have served as the Company's auditor since 2016.

## REPORTS OF MANAGEMENT

### *Management's Responsibility for Financial Statements*

Our management is responsible for the integrity and objectivity of all information presented in this annual report. The consolidated financial statements were prepared in conformity with accounting principles generally accepted in the United States of America and include amounts based on management's best estimates and judgments. Management believes the consolidated financial statements fairly reflect the form and substance of transactions and that the financial statements fairly represent the Company's financial position and results of operations.

The Audit Committee of the Board of Directors, which is composed solely of independent directors, meets regularly with the independent registered public accountants, PricewaterhouseCoopers LLP, the internal auditors and representatives of management to review accounting, financial reporting, internal control and audit matters, as well as the nature and extent of the audit effort. The Audit Committee is responsible for the engagement of the independent registered public accountants. The independent registered public accountants and internal auditors have free access to the Audit Committee.

/s/ HARSHA V. AGADI
**President and Chief Executive Officer**

/s/ GILES GOODBURN
**Executive Vice President and Chief Financial Officer**

/s/ GEORGE ABATE
**Vice President and Chief Accounting Officer**

## CONDUENT INCORPORATED
## CONSOLIDATED STATEMENTS OF INCOME (LOSS)

| (in millions, except per-share data) | Year Ended December 31, 2025 | 2024 | 2023 |
|---|---|---|---|
| **Revenue** | $ 3,042 | $ 3,356 | $ 3,722 |
| **Operating Costs and Expenses** | | | |
| Cost of services (excluding depreciation and amortization) | 2,490 | 2,730 | 2,888 |
| Selling, general and administrative (excluding depreciation and amortization) | 412 | 455 | 458 |
| Research and development (excluding depreciation and amortization) | 4 | 6 | 7 |
| Depreciation and amortization | 194 | 204 | 264 |
| Restructuring and related costs | 35 | 46 | 62 |
| Interest expense | 48 | 75 | 111 |
| Goodwill impairment | — | 28 | 287 |
| (Gain) loss on divestitures and transaction costs, net | 11 | (696) | 10 |
| Litigation settlements (recoveries), net | (1) | 9 | (30) |
| Loss on extinguishment of debt | 1 | 8 | — |
| Other (income) expenses, net | 8 | (13) | (3) |
| **Total Operating Costs and Expenses** | 3,202 | 2,852 | 4,054 |
| **Income (Loss) Before Income Taxes** | (160) | 504 | (332) |
| Income tax expense (benefit) | 10 | 78 | (36) |
| **Net Income (Loss)** | $ (170) | $ 426 | $ (296) |
| | | | |
| **Net Income (Loss) per Share:** | | | |
| Basic | $ (1.14) | $ 2.28 | $ (1.41) |
| Diluted | $ (1.14) | $ 2.23 | $ (1.41) |

*The accompanying notes are an integral part of these Consolidated Financial Statements.*

## CONDUENT INCORPORATED
## CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME (LOSS)

| (in millions) | Year Ended December 31, 2025 | 2024 | 2023 |
|---|---|---|---|
| **Net Income (Loss)** | $ (170) | $ 426 | $ (296) |
| **Other Comprehensive Income (Loss), Net**[1] | | | |
| Currency translation adjustments, net | 34 | (37) | 31 |
| Unrecognized gains (losses), net | (1) | (1) | 1 |
| Changes in benefit plans, net | 2 | 1 | (1) |
| **Other Comprehensive Income (Loss), Net** | 35 | (37) | 31 |
| | | | |
| **Comprehensive Income (Loss), Net** | $ (135) | $ 389 | $ (265) |

*(1) All amounts are net of tax. Tax effects were immaterial. Refer to Note 18 – Other Comprehensive Income (Loss) for information about pre-tax amounts.*

*The accompanying notes are an integral part of these Consolidated Financial Statements.*

## CONDUENT INCORPORATED
## CONSOLIDATED BALANCE SHEETS

| (in millions, except share data in thousands) | December 31, 2025 | December 31, 2024 |
|---|---|---|
| **Assets** | | |
| Cash and cash equivalents | $ 233 | $ 366 |
| Accounts receivable, net | 500 | 493 |
| Contract assets | 123 | 132 |
| Other current assets | 213 | 261 |
| Total current assets | 1,069 | 1,252 |
| Land, buildings and equipment, net | 181 | 167 |
| Operating lease right-of-use assets | 136 | 169 |
| Deferred contract costs, net | 128 | 126 |
| Goodwill | 617 | 609 |
| Other long-term assets | 266 | 276 |
| **Total Assets** | $ 2,397 | $ 2,599 |
| **Liabilities and Equity** | | |
| Current portion of long-term debt | $ 22 | $ 24 |
| Accounts payable | 142 | 157 |
| Accrued compensation and benefits costs | 173 | 170 |
| Contract liabilities | 74 | 103 |
| Other current liabilities | 270 | 290 |
| Total current liabilities | 681 | 744 |
| Long-term debt | 665 | 615 |
| Deferred taxes | 19 | 24 |
| Operating lease liabilities | 102 | 138 |
| Other long-term liabilities | 103 | 93 |
| **Total Liabilities** | 1,570 | 1,614 |
| | | |
| Contingencies (See Note 15) | | |
| Series A convertible preferred stock | 142 | 142 |
| | | |
| Common stock | 2 | 2 |
| Treasury stock, at cost | (235) | (210) |
| Additional paid-in capital | 3,968 | 3,952 |
| Retained earnings (deficit) | (2,613) | (2,433) |
| Accumulated other comprehensive loss | (437) | (472) |
| **Total Conduent Inc. Equity** | 685 | 839 |
| Non-controlling Interest | — | 4 |
| **Total Equity** | 685 | 843 |
| **Total Liabilities and Equity** | $ 2,397 | $ 2,599 |
| | | |
| Shares of common stock issued and outstanding | 154,709 | 161,829 |
| Shares of series A convertible preferred stock issued and outstanding | 120 | 120 |
| Shares of common stock held in treasury | 70,097 | 60,868 |

*The accompanying notes are an integral part of these Consolidated Financial Statements.*

## CONDUENT INCORPORATED
## CONSOLIDATED STATEMENTS OF CASH FLOWS

| (in millions) | Year Ended December 31, 2025 | 2024 | 2023 |
|---|---|---|---|
| **Cash Flows from Operating Activities:** | | | |
| Net income (loss) | $ (170) | $ 426 | $ (296) |
| Adjustments required to reconcile net loss to cash flows from operating activities: | | | |
| Depreciation and amortization | 194 | 204 | 264 |
| Contract inducement amortization | 3 | 3 | 3 |
| Goodwill impairment | — | 28 | 287 |
| Deferred income taxes | (22) | (5) | (54) |
| Amortization of debt financing costs | 1 | 3 | 4 |
| Loss on extinguishment of debt | 1 | 8 | — |
| (Gain) loss on divestitures and sales of fixed assets, net | 2 | (724) | — |
| Stock-based compensation | 19 | 19 | 19 |
| Changes in operating assets and liabilities: | | | |
| Accounts receivable | 2 | 34 | 26 |
| Other current and long-term assets | (33) | (60) | (111) |
| Accounts payable and accrued compensation and benefits costs | (12) | (14) | (52) |
| Other current and long-term liabilities | (60) | (11) | (2) |
| Net change in income tax assets and liabilities | 2 | 39 | 1 |
| Net cash provided by (used in) operating activities | (73) | (50) | 89 |
| **Cash Flows from Investing Activities:** | | | |
| Cost of additions to land, buildings and equipment | (59) | (28) | (51) |
| Cost of additions to internal use software | (22) | (28) | (42) |
| Proceeds from divestitures | 53 | 851 | — |
| Net cash provided by (used in) investing activities | (28) | 795 | (93) |
| **Cash Flows from Financing Activities:** | | | |
| Proceeds from revolving credit facility | 259 | 80 | — |
| Proceeds from the issuance of debt, net | 5 | — | — |
| Payments of debt issuance costs | (4) | — | — |
| Payments of revolving credit facility | (150) | (80) | — |
| Payments of debt | (105) | (676) | (41) |
| Treasury stock purchases | (25) | (182) | (27) |
| Excise tax payment on treasury stock purchases | (2) | — | — |
| Taxes paid for settlement of stock-based compensation | (2) | (9) | (7) |
| Dividends paid on preferred stock | (10) | (10) | (10) |
| (Repurchase of) contribution from noncontrolling interest | (5) | — | 4 |
| Net cash provided by (used in) financing activities | (39) | (877) | (81) |
| Effect of exchange rate changes on cash, cash equivalents and restricted cash | 6 | (10) | 6 |
| Increase (decrease) in cash, cash equivalents and restricted cash | (134) | (142) | (79) |
| Cash, Cash Equivalents and Restricted Cash at Beginning of Period | 377 | 519 | 598 |
| **Cash, Cash Equivalents and Restricted Cash at End of period[1]** | $ 243 | $ 377 | $ 519 |

(1) *Includes $10 million, $11 million and $21 million of restricted cash as of the years ended December 31, 2025, 2024 and 2023, respectively, that was included in Other current assets on their respective Consolidated Balance Sheets.*

*The accompanying notes are an integral part of these Consolidated Financial Statements.*

## CONDUENT INCORPORATED
## CONSOLIDATED STATEMENTS OF SHAREHOLDERS' EQUITY

| (in millions) | Common Stock | Treasury Stock | Additional Paid-in Capital | Retained Earnings | AOCL[1] | Non-controlling Interest | Shareholders' Equity |
|---|---|---|---|---|---|---|---|
| **Balance at December 31, 2022** | $ 2 | $ — | $ 3,924 | $ (2,543) | $ (466) | $ — | $ 917 |
| Dividend - preferred stock, $80/per share | — | — | — | (10) | — | — | (10) |
| Stock incentive plans, net | — | — | 14 | — | — | — | 14 |
| Treasury stock purchases | — | (27) | — | — | — | — | (27) |
| Contribution from noncontrolling interest | — | — | — | — | — | 4 | 4 |
| Comprehensive Income (Loss): | | | | | | | |
| Net Loss | — | — | — | (296) | — | — | (296) |
| Other comprehensive income (loss), net | — | — | — | — | 31 | — | 31 |
| Total Comprehensive Income (Loss), Net | — | — | — | (296) | 31 | — | (265) |
| **Balance at December 31, 2023** | $ 2 | $ (27) | $ 3,938 | $ (2,849) | $ (435) | $ 4 | $ 633 |
| Dividend - preferred stock, $80/per share | — | — | — | (10) | — | — | (10) |
| Stock incentive plans, net | — | — | 14 | — | — | — | 14 |
| Treasury stock purchases | — | (183) | — | — | — | — | (183) |
| Contribution from noncontrolling interest | — | — | — | — | — | — | — |
| Comprehensive Income (Loss): | | | | | | | |
| Net Loss | — | — | — | 426 | — | — | 426 |
| Other comprehensive income (loss), net | — | — | — | — | (37) | — | (37) |
| Total Comprehensive Income (Loss), Net | — | — | — | 426 | (37) | — | 389 |
| **Balance at December 31, 2024** | $ 2 | $ (210) | $ 3,952 | $ (2,433) | $ (472) | $ 4 | $ 843 |
| Dividend - preferred stock, $80/per share | — | — | — | (10) | — | — | (10) |
| Stock incentive plans, net | — | — | 17 | — | — | — | 17 |
| Treasury stock purchases | — | (25) | — | — | — | — | (25) |
| Buyback of noncontrolling interest | — | — | (1) | — | — | (4) | (5) |
| Comprehensive Income (Loss): | | | | | | | |
| Net Income | — | — | — | (170) | — | — | (170) |
| Other comprehensive income (loss), net | — | — | — | — | 35 | — | 35 |
| Total Comprehensive Income (Loss), Net | — | — | — | (170) | 35 | — | (135) |
| **Balance at December 31, 2025** | $ 2 | $ (235) | $ 3,968 | $ (2,613) | $ (437) | $ — | $ 685 |

*(1) AOCL - Accumulated other comprehensive loss.*

*The accompanying notes are an integral part of these Consolidated Financial Statements.*

**CONDUENT INCORPORATED**
**NOTES TO CONSOLIDATED FINANCIAL STATEMENTS**

## Note 1 – Basis of Presentation and Summary of Significant Accounting Policies

References herein to "we," "us," "our," the "Company" and "Conduent" refer to Conduent Incorporated and its consolidated subsidiaries unless the context suggests otherwise.

### Description of Business

Conduent Incorporated is a New York corporation, organized in 2016. Conduent delivers digital business solutions and services spanning the commercial, government and transportation spectrum – creating valuable outcomes for its clients and the millions of people who count on them. The Company leverages cloud computing, artificial intelligence ("AI"), machine learning, automation and advanced analytics to deliver mission-critical solutions. Through a dedicated global team of approximately 51,000 associates, as well as process expertise and advanced technologies, Conduent's solutions and services digitally transform its clients' operations to enhance customer experiences, improve performance, increase efficiencies and reduce costs.

### Basis of Presentation

The Company's Consolidated Financial Statements included the historical basis of assets, liabilities, revenues and expenses of the individual businesses of the Company, including joint ventures and partnerships over which the Company has a controlling financial interest. The Company has prepared the Consolidated Financial Statements in accordance with accounting principles generally accepted in the United States of America ("U.S. GAAP") and pursuant to the rules and regulations of the SEC. Certain reclassifications have been made to prior years' amounts to conform to the current year presentation. All intercompany transactions and balances have been eliminated.

In the first quarter of 2023, the Company identified an error and recorded an out-of-period adjustment to correct the recognition of revenue on a Government segment contract that originated in 2020 and impacted all quarterly periods through December 31, 2022. This adjustment resulted in a reduction to revenue and income (loss) before income taxes of $7 million and a corresponding decrease to accounts receivable of $1 million and an increase to other current liabilities of $6 million in the first quarter of 2023. The Company evaluated the impact of the out-of-period adjustment and concluded it was not material to any previously issued interim or annual consolidated financial statements and the adjustment was not material to the year ending December 31, 2023.

The Company has evaluated subsequent events through February 19, 2026.

The common stock of Conduent trades on the Nasdaq Global Select Market ("Nasdaq") under the ticker "CNDT".

### Use of Estimates

The Company prepared the Consolidated Financial Statements using financial information available at the time of preparation, which requires it to make estimates and assumptions that affect the amounts reported. The Company's most significant estimates pertain to valuation of goodwill, contingencies and litigation and income taxes. These estimates are based on management's best knowledge of current events, historical experience, and on various other assumptions that are believed to be reasonable under the circumstances. As a result, actual results may be different from these estimates.

### New Accounting Standards

**Disaggregation of Income Statement Expenses:** In November 2024, the Financial Accounting Standards Board ("FASB") issued final guidance designed to enhance financial reporting by requiring public business entities to disclose additional details regarding specific expense categories in the notes to the financial statements for both interim and annual periods. The new guidance is effective for annual periods beginning after December 15, 2026 and interim periods beginning after December 15, 2027. The Company is not early adopting this guidance. As the guidance is disclosure related, adoption will not have any impact on the Company's Consolidated Financial Statements.

**Internal-use Software:** In September 2025, the FASB issued final guidance designed to modernize the accounting for software costs that are accounted for as "internal-use software." This new guidance removes all previous references to project stages. It requires capitalization of software costs when (i) management has authorized and committed to funding the software project and (ii) it is probable that the project will be completed and the software will be used to perform the function intended. The new guidance is effective for annual and interim periods beginning after December 15, 2027. Early adoption is permitted as of the beginning of an annual reporting period. The Company is currently evaluating the impact that this new standard will have on its Consolidated Financial Statements.

### Recently Adopted Accounting Standards

**Income Taxes:** In December 2023, the FASB issued final guidance designed to improve income tax disclosures, particularly disclosures around business entities' income tax rate reconciliation and income taxes paid. The guidance requires consistent categories and greater disaggregation of information in the reconciliation of an entity's statutory tax rate to its effective tax rate and information about income taxes paid disaggregated by jurisdiction. As allowed by the guidance, the Company adopted this guidance prospectively effective January 1, 2025. As the guidance is disclosure related, adoption did not have any impact on the Company's Consolidated Financial Statements. The required disclosure is included in Note 14 – Income Taxes.

### Summary of Accounting Policies

### Cash and Cash Equivalents

Cash and cash equivalents consist of cash on hand, including money market funds and investments with original maturities of three months or less.

Restricted cash is primarily comprised of cash collected on accounts receivable that have been factored but not yet remitted to third-party institutions. The Company includes restricted cash in Other current assets and the corresponding liability is included in Other current liabilities in its Consolidated Balance Sheets.

### Accounts Receivable, Net and Receivable Sales

Credit risk has not historically been significant to the Company's business due to the nature of its customers, which are state and federal governments, public sector, and large commercial corporations. The Company believes that the credit risk associated with its receivables is limited due to the creditworthiness of its customers. Allowances for credit losses were less than $1.0 million at December 31, 2025 or 2024.

The Company enters into factoring agreements in the normal course of business as part of our cash and liquidity management, to sell certain accounts receivable without recourse to third-party financial institutions. These transactions are treated as a sale and are accounted for as a reduction in accounts receivable because the agreement transfers effective control over, and risk related to, the receivables to the buyers. Cash proceeds from this arrangement are included in cash flow from operating activities in the Consolidated Statements of Cash Flows. In 2025, 2024 and 2023, the Company sold certain accounts receivable and derecognized the corresponding receivable balance. Accounts receivable sales for the years ended December 31, 2025 and 2024 were $875 million and $624 million, respectively.

### Assets/Liabilities Held for Sale

The Company classifies assets as held for sale in the period when the following conditions are met: (i) management, having the authority to approve the action, commits to a plan to sell the asset (disposal group); (ii) the asset (disposal group) is available for immediate sale in its present condition subject only to terms that are usual and customary for sales of such assets (disposal group); (iii) an active program to locate a buyer and other actions required to complete the plan to sell the asset (disposal group) have been initiated; (iv) the sale of the asset (disposal group) is probable, and transfer of the asset (disposal group) is expected to qualify for recognition as a completed sale within one year, except if events or circumstances beyond our control extend the period of time required to sell the asset (disposal group) beyond one year; (v) the asset (disposal group) is being actively marketed for sale at a price that is reasonable in relation to its current fair value; and (vi) actions required to complete the plan indicate that it is unlikely that significant changes to the plan will be made or that the plan will be withdrawn.

A long-lived asset (disposal group) that is classified as held for sale is initially measured at the lower of its carrying value or fair value less any costs to sell. Any loss resulting from this measurement is recognized in the period in which the held for sale criteria are met. Conversely, gains are not recognized on the sale of a long-lived asset (disposal group) until the date of sale.

The fair value of a long-lived asset (disposal group) less any costs to sell is assessed each reporting period it remains classified as held for sale and any subsequent changes are reported as an adjustment to the carrying value of the asset (disposal group), as long as the new carrying value does not exceed the carrying value of the asset at the time it was initially classified as held for sale.

Refer to Note 4 – Divestitures to the Consolidated Financial Statements for additional information.

### Land, Buildings and Equipment

Land, buildings and equipment are recorded at cost. Buildings and equipment are depreciated over their estimated useful lives. Leasehold improvements are depreciated over the shorter of the lease term or the estimated useful life. Significant improvements are capitalized and maintenance and repairs are expensed when incurred.

Refer to Note 5 – Land, Buildings, Equipment and Software, Net for further discussion.

### Internal Use and Product Software

**Internal Use Software:** The Company capitalizes direct costs associated with developing, purchasing or otherwise acquiring software for internal use and amortizes these costs on a straight-line basis over the estimated useful life of the software, beginning when the software is implemented. Costs for upgrades and enhancements that will not result in additional functionality are expensed as incurred. Amounts paid for Internal Use Software are included in Cash Flows from Investing Activities.

**Product Software**: The Company expenses product software costs to Research and development prior to technological feasibility. Upon reaching technological feasibility, certain costs related to the development of software solutions to be sold to its customers are capitalized. These costs are amortized on a straight-line basis over the estimated economic life of the software. Amounts paid for Product Software are included in Cash Flows from Operating activities. The Company performs annual reviews to ensure that unamortized Product Software costs remain recoverable from estimated future operating profits (net realizable value). Costs to support or service licensed software are charged to Costs of services as incurred.

Internal use and Product software are included in Other long-term assets on the Company's Consolidated Balance Sheets. Refer to Note 5 – Land, Buildings, Equipment and Software, Net and Note 9 – Supplementary Financial Information for further information.

### Leases

The Company determines if an arrangement is a lease at the inception of the contract and whether that lease meets the classification criteria of a finance or operating lease. The Company has operating and finance leases for real estate and equipment. Operating leases are included in Operating lease right of use ("ROU") assets, Other current liabilities, and Operating lease liabilities in the Company's Consolidated Balance Sheets. Finance leases are included in Land, buildings and equipment, net, Current portion of long-term debt, and Long-term debt in the Company's Consolidated Balance Sheets.

ROU assets represent the Company's right to use an underlying asset for the lease term and lease liabilities represent the Company's obligation to make lease payments arising from the lease. ROU assets and liabilities are recognized at the commencement date based on the net present value of lease payments over the lease term using the Company's incremental borrowing rates as the Company's leases generally do not provide an implicit rate. The incremental borrowing rate represents an estimate of the interest rate that the Company would incur at lease commencement to borrow an amount equal to the lease payments on a collateralized basis over the term of a lease within a particular currency environment.

The Company's lease terms may include options to extend or terminate the lease when it is reasonably certain that the Company will exercise that option based on economic factors. The Company recognizes operating fixed lease expense and finance lease depreciation on a straight-line basis over the lease term. Variable lease expense is recognized in the period in which the obligation for those payments is incurred. Leases with an initial term of one

year or less are expensed on a straight-line basis over the lease term. The Company accounts for lease and non-lease components separately for its equipment leases, based on the estimated standalone price of each component, and combines lease and non-lease components for its real estate leases.

Refer to Note 6 – Leases for further information.

### Contingencies and Litigation

The Company is currently involved in various claims and legal proceedings. At least quarterly, it reviews the status of each significant matter and assesses its potential financial exposure considering all available information including, but not limited to, the impact of negotiations, settlements, rulings, advice of legal counsel and other updated information and events pertaining to a particular matter. If the potential loss from any claim or legal proceeding is considered probable and the amount can be reasonably estimated, the Company accrues a liability for the estimated loss. The estimated losses are recorded within Litigation settlements (recoveries), net in the Company's income statement. Significant judgment is required in both the determination of probability and the determination as to whether an exposure is reasonably estimable. Because of uncertainties related to these matters, accruals are based only on the best information available at the time. As additional information becomes available, the Company reassesses the potential liability related to pending claims and litigation and may revise its estimates. These revisions in the estimates of potential liabilities could have a material impact on the results of operations and financial position. The Company's policy is to expense legal defense costs related to such matters as incurred. These costs are recorded within Selling, general and administrative expenses in the Company's income statement. Any insurance recoveries for litigation settlements and defense costs are recorded when such recoveries are deemed probable and collectability is reasonably assured. Such recoveries are recorded in the same financial statement line as the related costs to which the recoveries relate.

Refer to Note 15 – Contingencies and Litigation to the Consolidated Financial Statements for additional information regarding loss contingencies.

### Goodwill

For acquired businesses, the Company records the acquired assets and assumed liabilities based on their relative fair values at the date of acquisitions (commonly referred to as the purchase price allocation). Goodwill represents the excess of the purchase price paid in excess of the fair value of net tangible and intangible assets acquired. For the Company's business acquisitions, the purchase price is allocated to identifiable intangible assets separate from goodwill if they are from contractual or other legal rights, or if they could be separated from the acquired business and sold, transferred, licensed, rented or exchanged.

The Company tests goodwill for impairment annually as of October 1st, or more frequently if an event or change in circumstances indicate the asset may be impaired. Impairment testing for goodwill is performed at the reporting unit level using a qualitative and/or quantitative assessment. For the quantitative assessment, the Company determines the fair value of its reporting units utilizing a combination of both an Income Approach and a Market Approach. The Income Approach applies a discounted cash flow analysis based on forecasted future business results of the reporting units. The Market Approach utilizes the guideline public company method. These valuation approaches require significant judgment and consider several factors that include, but are not limited to, expected future cash flows, growth rates and discount rates and comparable multiples from publicly traded companies in our industry. In addition, the Company is required to make certain assumptions and estimates regarding the current economic environment, industry factors and the future profitability of its businesses.

When performing its discounted cash flow analysis for each reporting unit, the Company incorporates the use of projected financial information and discount rates that are developed using market participant-based assumptions. The cash-flow projections are based on three-year financial forecasts developed by management that include revenue and expense projections, restructuring activities, capital spending trends and investment in working capital to support anticipated revenue growth or other changes in the business. The selected discount rates consider the risk and nature of the respective reporting units' cash flows, appropriate capital structure and rates of return that market participants would require to invest their capital in our reporting units.

The Company believes these assumptions are appropriate and reflect its forecasted long-term business model and considers its historical results as well as the current economic environment and markets that the Company serves. The most significant assumptions used in the goodwill analysis relate to discount rates and long-term organic growth rates.

Refer to Note 7 – Goodwill for further information.

### Impairment of Long-Lived Assets

The Company reviews the recoverability of its long-lived assets, including buildings, equipment, internal use software, product software, right-of-use assets and other intangible assets, when events or changes in circumstances occur that indicate that the carrying value of the asset may not be recoverable. The assessment of possible impairment is based on the Company's ability to recover the carrying value of the asset from the expected future cash flows (undiscounted and without interest charges) of the related operations. If these cash flows are less than the carrying value of such asset, an impairment loss is recognized for the difference between estimated fair value and carrying value. The Company's primary measure of fair value is based on forecasted cash flows.

### Income Taxes

The Company accounts for income taxes under the asset and liability method. Deferred tax assets and liabilities are based on differences between U.S. GAAP reporting and tax bases of assets or liabilities and based on current tax laws, regulations and rates.

The recognition of deferred tax assets requires an assessment to determine the realization of such assets. Management establishes valuation allowances on deferred tax assets when it is determined “more-likely-than-not” that some portion or all the deferred tax assets may not be realized. Management considers positive and negative evidence in evaluating the ability of the Company to realize its deferred tax assets, including its historical results and forecasts of future ability to realize its deferred tax assets, including projected future taxable income, the expected timing of the reversals of existing temporary differences and tax planning strategies.

The Company is subject to ongoing tax examinations and assessments in various jurisdictions. The Company has unrecognized tax benefits for uncertain tax positions. The Company follows U.S. GAAP which prescribes a recognition threshold and measurement attribute for the financial statement recognition and measurement of a tax position taken or expected to be taken in a tax return. The Company's ongoing assessments of the more-likely-than-not outcomes of the examinations and related tax positions require judgment and can materially increase or decrease its effective tax rate, as well as impact its operating results.

On December 22, 2017, the U.S. enacted the Tax Cuts and Jobs Act ("Tax Reform"). The Tax Reform includes a tax on global intangible low-taxed income (“GILTI”), which imposes a U.S. tax on certain income earned by the Company’s foreign subsidiaries. The Company elected to treat the tax on GILTI as a period cost when incurred and therefore, no deferred taxes for GILTI were recognized for the year ended December 31, 2025.

Refer to Note 14 – Income Taxes for further discussion.

### Share Repurchase Program

On May 16, 2023, the Board of Directors authorized a share repurchase program, granting approval for the Company to repurchase up to $75 million of its common stock over the next three years (the "2023 Repurchase Plan"). This 2023 Repurchase Plan was completed in September 2024.

On May 20, 2025, the Board of Directors authorized a new share repurchase program, granting approval for the Company to repurchase up to $50 million of its common stock over the next three years (the "2025 Repurchase Plan").

The Company had or has the discretion to repurchase shares periodically through open market transactions and may include Rule 10b5-1 trading plans under both the 2023 Repurchase Plan and the 2025 Repurchase Plan.

Neither the 2023 Repurchase Plan nor the 2025 Repurchase Plan obligated the Company to acquire a specific number of shares and both programs were or can be modified, suspended or discontinued at any time at the Company’s discretion without prior notice.

The Company holds repurchased shares of common stock as treasury stock. The Company accounts for treasury stock under the cost method and includes treasury stock as a component of shareholders' equity. The Company accrues the cost of repurchased shares and excludes such shares from the calculation of basic and diluted earnings per share, as of the trade date. The Company recognized a liability for share repurchases which had not settled and for which cash had not been paid in Other current liabilities on the Company's Consolidated Balance Sheets.

### Noncontrolling Interest

The Company's Consolidated Financial Statements include the historical basis of assets, liabilities, revenues and expenses of the individual businesses of the Company, including joint ventures over which the Company has a controlling financial interest. Control is based on ownership interest. The ownership interest held by an owner other than the Company in a less than wholly owned subsidiary is classified as a non-controlling interest. Net income (loss) is allocated to the noncontrolling interest based on ownership interest.

In May 2023, the Company signed a new customer contract with the State of Victoria, Australia to provide the next generation of the state's public transport ticketing system. As a result, the Company and Convergint Australia Pty Ltd ("Convergint") entered into a shareholder agreement to form Conduent Victoria Ticketing System Pty Ltd ("Conduent Victoria"). The Company held an 80% equity investment in Conduent Victoria and the remaining 20% was owned by Convergint. During 2025, the Company repurchased the interest held by the minority partner for $5 million and Conduent Victoria became a wholly-owned subsidiary of the Company.

Prior to its repurchase by the Company, noncontrolling interest in Conduent Victoria was not material to the Company's Consolidated Statements of Income (Loss) or Consolidated Statements of Comprehensive Income (Loss) for any of the periods presented. Therefore, the Company did not present any separate disclosures for such noncontrolling interest in those statements.

### Foreign Currency Translation

The functional currency for most foreign operations is the local currency. Net assets are translated at current rates of exchange and income, expense and cash flow items are translated at average exchange rates for the applicable period. The translation adjustments are recorded in Accumulated other comprehensive loss.

The U.S. Dollar is used as the functional currency for certain foreign subsidiaries that conduct their business in U.S. Dollars. A combination of current and historical exchange rates is used in re-measuring the local currency transactions of these subsidiaries and the resulting exchange adjustments are recorded in Currency (gains) and losses within Other (income) expenses, net together with other foreign currency re-measurements.

### Stock-based Compensation

Stock-based compensation expense for stock-based awards which include restricted stock units (RSUs) and performance stock units ("PSUs") is based on the grant date fair value of those awards. Stock-based compensation expense is recognized for RSUs as shares vest over the requisite service period. Vesting of PSUs is contingent on meeting performance targets. If the minimum performance targets are not met, no compensation cost is recognized and any recognized compensation cost is reversed.

Refer to Note 17 – Shareholders' Equity for further information.

### Revenue Recognition

The Company recognizes revenue when control of the promised goods or services is transferred to its customers, in an amount that reflects the consideration that the Company expects to receive in exchange for those goods or services.

The Company's contracts with customers often include promises to transfer multiple products and services to a customer. Determining whether products and services are considered distinct performance obligations that should be accounted for separately, versus together, may require judgment. Typically, the Company's contracts include performance obligation(s) to stand-ready on a daily or monthly basis to provide services to the customers. Under a stand-ready obligation, the evaluation of the nature of our performance obligation is focused on each time increment rather than the underlying activities. Accordingly, the promise to stand-ready is accounted for as a single-series performance obligation.

Once the Company determines the performance obligations, the Company determines the transaction price, which is based on fixed and/or variable consideration. Typical forms of variable consideration include variable pricing based on the number of transactions processed or usage-based pricing arrangements. Variable consideration is also present in the form of volume discounts, tiered and declining pricing, penalties for service level agreements, performance bonuses and credits. In circumstances where the Company meets certain requirements to allocate variable consideration to a distinct service within a series of related services, it allocates variable consideration to

each distinct period of service within the series. In limited circumstances, if the Company does not meet those requirements, it includes an estimate of variable consideration in the transaction price to the extent it is probable that a significant reversal of cumulative revenue recognized will not occur when the uncertainty is resolved. For contracts with multiple performance obligations, the transaction price is allocated to separate performance obligations on a relative standalone selling price basis. The Company generally determines standalone selling prices based on the prices charged to customers or by using expected cost plus a reasonable margin.

The Company typically satisfies its performance obligations over time as the services are provided. A time-elapsed output method is used to measure progress because the nature of the Company's promise is a stand-ready service and efforts are expended evenly throughout the period. In limited circumstances, such as contracts for implementation or development projects, the Company also uses a cost-to-cost based input method. The Company has determined that the above methods provide a faithful depiction of the transfer of services to the customer.

Estimates of revenue expected to be recognized in future periods exclude unexercised customer options to purchase additional services that do not represent material rights to the customer. Customer options that do not represent a material right are only accounted for when the customer exercises its option to purchase additional goods or services. The Company recognizes revenue for non-refundable upfront implementation fees on a straight-line basis over the period between the initiation of the services through the end of the contract term.

When more than one party is involved in providing services to a customer, the Company evaluates whether it is the principal, and reports revenue on a gross basis, or an agent, and reports revenue on a net basis. In this assessment, the Company considers the following: if it obtains control of the specified services before they are transferred to the customer; is primarily responsible for fulfillment and inventory risk; and has discretion in establishing price.

The Company reports revenue net of any revenue-based taxes assessed by governmental authorities that are imposed on and concurrent with specific revenue-producing transactions. The primary revenue-based taxes are sales tax and value-added tax ("VAT").

The Company's payment terms vary by type of services offered. The time between invoicing and when payment is due is not significant. For certain services and customer types, the Company requires payment before services are rendered.

From time to time, the Company's contracts are modified to account for additions or changes to existing performance obligations. The Company's contract modifications related to stand-ready performance obligations are generally accounted for prospectively.

Refer to Note 2 – Revenue for further discussion.

### Costs to Obtain and Fulfill a Contract

The Company capitalizes commission expenses paid to internal sales personnel that are incremental costs related to obtaining customer contracts. These costs are recorded as Deferred contract costs, net. The judgments made in determining the costs to be capitalized include whether the commissions are incremental and directly related to a successful acquisition of a customer contract. Capitalized costs are amortized within Depreciation and amortization over the term of the contract or the estimated life of the customer relationship if renewals are expected and the renewal commission is not commensurate with the initial commission. Sales commissions are expensed as incurred if the amortization period is one year or less. In addition, the Company may provide inducement payments to secure customer contracts. These inducement payments are capitalized and amortized as a reduction of revenue over the term of the customer contract.

The Company also capitalizes costs incurred to fulfill its contracts that (i) relate directly to the contract, (ii) are expected to generate resources that will be used to satisfy the Company's performance obligation under the contract and (iii) are expected to be recovered through revenue generated under the contract. These costs primarily consist of set-up and transition activities and are included in Deferred contract costs, net. Contract fulfillment costs are amortized within Depreciation and amortization on a systematic basis over the expected period of benefit as the Company satisfies its performance obligations by transferring services to the customer.

Deferred contract costs are reviewed for recoverability annually or whenever an event occurs that indicates that the capitalized contract costs may no longer be recoverable.

Refer to Note 2 – Revenue for further discussion.

## Note 2 – Revenue

**Disaggregation of Revenue**

The Company's contracts with customers are broadly similar in nature throughout the Company's major service offerings. The following is a description of the major service offerings:

**Customer Experience Management:** The Company delivers a full range of customer contact services including customer care, technical support, loyalty management, and outbound and inbound sales, handling many complex interactions and representing the brands of its clients. The Company creates better experiences across the customer lifecycle through a variety of channels including chat, email, voice and virtual agent to help customers where and how they want to engage. Through omni-channel communications, automation and analytics, as well as labor efficiencies, the Company helps its clients drive revenue growth, enable scale, and gain cost reductions and other operational efficiencies. The Company serves marquee clients across multiple sectors, including the financial services, healthcare and life sciences, logistics, technology, telecom, travel and hospitality sectors, helping to resolve complex issues for their customers with empathy and effectiveness.

**Business Process as a Service ("BPaaS"):** The Company helps its clients digitally transform business processes and drive efficiency, automation and scale across essential business functions. The Company streamlines client operations through its deep industry experience, understanding of its clients' needs and the latest technology solutions to reduce costs, improve security, performance and accuracy, and enable revenue growth, while enhancing the end-user experience. The Company's portfolio of BPaaS solutions spans payment integrity, finance, accounting, and procurement, human capital, legal and compliance, and bank and lending.

**Integrated Digital Solutions:** The Company drives efficiencies for clients with more digitized processes across the customer and document lifecycle through automation, data analytics and AI-powered solutions. This helps to shorten decision-making time on items like claims and applications while lowering costs, reducing manual effort, improving data accuracy, providing omnichannel communications and enhancing the overall customer experience. The Company's solutions span: document and claims processing; health plan administration; scanning and digitization of mailrooms, data and documents; omnichannel digital and physical communications, including print and mail and solutions focused specifically in the pharmaceutical and banking industries.

**Government Healthcare Solutions:** The Company provides program administration solutions for government healthcare programs with a range of innovative solutions such as Medicaid management, provider services, Medicaid business intelligence, pharmacy benefits management, eligibility and enrollment support, customer contact services, application processing, premium billing, and case management solutions.

**Government Services Solutions:** The Company is a leader in government payment disbursements for federally sponsored programs including benefit card programs and payment card programs. Benefit card programs are closed loop solutions that support Supplemental Nutrition Assistance Program, Temporary Assistance for Needy Families and Women, Infants and Children. Payment card programs are open loop solutions that support child support and Unemployment Insurance. The Company also offers a broad set of child support services predominately to State Disbursement Units, including processing and distributing payments, child support payment cards, childcare credentialing and case management, among others, to help states comply with federal standards.

**Road Usage Charging and Management Services:** The Company's electronic tolling, urban congestion management and mileage-based user solutions help its clients accurately assess and collect payments millions of times every day to generate revenue for infrastructure improvements. The Company's solutions include vehicle passenger detection systems, electronic toll collection, automated license plate recognition and congestion management solutions.

**Transit Solutions:** For train, bus, subway, metro and other transit travelers, the Company helps make journeys more personalized and convenient while increasing fare collections for authorities and agencies. The Company combines fare collection, account-based ticketing and intelligent mobility to provide clients with the added efficiency of a single point of management for all transit solutions.

**Commercial Vehicles:** The Company provides computer-aided dispatch/automatic vehicle location technology to help clients manage their fleet operations.

In 2025, the Company updated the presentation of disaggregated revenue by major service offering within the Commercial segment. This change had no impact on disaggregated revenue by reportable segment or the timing of revenue recognition. All prior periods presented have been revised to reflect this change.

The following table provides information about disaggregated revenue by major service offering and reportable segment and the timing of revenue recognition. Refer to Note 3 – Segment Reporting for additional information on the Company's reportable segments.

| | Year Ended December 31, | | |
|---|---|---|---|
| (in millions) | 2025 | 2024 | 2023 |
| **Commercial:** | | | |
| Customer Experience Management | $ 515 | $ 549 | $ 617 |
| BPaaS | 465 | 506 | 521 |
| Integrated Digital Solutions | 531 | 551 | 530 |
| **Total Commercial** | 1,511 | 1,606 | 1,668 |
| **Government:** | | | |
| Government Healthcare Solutions | 532 | 551 | 605 |
| Government Services Solutions | 390 | 433 | 489 |
| **Total Government** | 922 | 984 | 1,094 |
| **Transportation:** | | | |
| Road Usage Charging & Management Solutions | 238 | 244 | 317 |
| Transit Solutions | 371 | 341 | 233 |
| Commercial Vehicles | — | 1 | 8 |
| **Total Transportation** | 609 | 586 | 558 |
| **Other:** | | | |
| **Divestitures** | — | 180 | 402 |
| **Total Consolidated Revenue** | $ 3,042 | $ 3,356 | $ 3,722 |
| | | | |
| **Timing of Revenue Recognition:** | | | |
| Point in time | $ 113 | $ 106 | $ 107 |
| Over time | 2,929 | 3,250 | 3,615 |
| **Total Revenue** | $ 3,042 | $ 3,356 | $ 3,722 |

### Contract Balances

The Company receives payments from customers based upon contractual billing schedules. Accounts receivable are recorded when the right to consideration becomes unconditional. Contract assets are the Company's rights to consideration for services provided when the right is conditioned on something other than passage of time (for example, meeting a milestone for the right to bill under the cost-to-cost measure of progress). Contract assets are transferred to Accounts receivable, net when the rights to consideration become unconditional. Unearned income includes payments received in advance of performance under the contract, which are realized when the associated revenue is recognized under the contract.

The following table provides information about significant movements in contract assets (current and long-term):

| (in millions) | December 31, 2025 | December 31, 2024 |
|---|---|---|
| Beginning balance | $ 135 | $ 190 |
| Additional contract assets recognized | 199 | 139 |
| Billed and transferred to Accounts receivable and other | (206) | (194) |
| Ending balance[1] | $ 128 | $ 135 |

[1] Of which $6 million and $3 million are included in Other long-term assets as of December 31, 2025 and 2024, respectively.

The following table provides information about significant movements in contract liability balances (current and long-term):

| (in millions) | December 31, 2025 | December 31, 2024 |
|---|---|---|
| Beginning balance | $ 155 | $ 146 |
| Additional deferral of income | 207 | 276 |
| Revenue recognized related to deferral of income[1] | (219) | (267) |
| Ending balance[2] | $ 143 | $ 155 |

[1] Of which $94 million and $92 million were recognized during the years ended December 31, 2025 and 2024, respectively, that related to the Company's contract liabilities as of December 31, 2024 and 2023, respectively.

[2] Of which $69 million and $52 million are included in Long-term contract liabilities as of December 31, 2025 and 2024, respectively.

**Transaction Price Allocated to the Remaining Performance Obligations**

Estimated revenue expected to be recognized in the future related to performance obligations that are unsatisfied or partially satisfied at December 31, 2025, was approximately $1.3 billion. The Company expects to recognize approximately 75% of this revenue over the next 2 years and the remainder thereafter.

**Costs to Obtain and Fulfill a Contract**

The following table shows the net book value of the capitalized costs to obtain and fulfill a contract:

| (in millions) | December 31, 2025 | December 31, 2024 |
|---|---|---|
| Costs to obtain a contract | $ 18 | $ 19 |
| Costs to fulfill a contract | 105 | 99 |

The amortization of costs incurred to obtain and fulfill a contract, excluding contract inducements, for the years ended December 31, 2025, 2024 and 2023 were $53 million, $40 million and $40 million, respectively. The balances at December 31, 2025 and 2024 are expected to be amortized over a weighted average remaining life of approximately 4 and 3 years, respectively.

The expected amortization expense for the next five years and thereafter for the costs to obtain and fulfill a contract is as follows (in millions):

| 2026 | 2027 | 2028 | 2029 | 2030 | Thereafter |
|---|---|---|---|---|---|
| $ 41 | $ 27 | $ 15 | $ 10 | $ 5 | $ 25 |

The net book value of contract inducement costs was $5 million and $8 million as of December 31, 2025 and 2024, respectively. The net book value of costs to obtain and fulfill a contract are referred to as Deferred contract costs, net on the Company's Consolidated Balance Sheets.

## Note 3 – Segment Reporting

The Company's reportable segments correspond to how it organizes and manages the business, as defined by the Company's Chief Executive Officer, who is also its Chief Operating Decision Maker ("CODM"), and are aligned to the industries in which the Company's clients operate. The Company's segments involve the delivery of business process services and include service arrangements where it manages a customer's business activity or process.

Divestitures includes the results of the Company's BenefitWallet Portfolio, Curbside Management and Public Safety Solutions businesses and Casualty Claims business, each of which was divested in 2024. Refer to Note 4 – Divestitures for additional information.

The Company's CODM evaluates the Company's financial performance based on Segment profit (loss) for its three reportable segments - Commercial, Government and Transportation. The Company's CODM uses Segment profit (loss) information to monitor budget versus actual results and then uses this information to help make informed decisions about future resource investment, potential restructuring of segments to enhance overall company performance, and future divestitures and acquisitions.

The Company's CODM does not evaluate operating segments using discrete asset information as a significant portion of the assets is managed at the total company level.

- **Commercial:** The Commercial segment provides business process services that span its clients' businesses end-to-end from the front-office to the back-office for a variety of commercial industries. These solutions are both cross-industry and industry-specific in nature. Across the Commercial segment, the Company operates on its clients' behalf to deliver mission-critical solutions and services to reduce costs, improve efficiencies and enhance performance for the Company's clients and deliver better experiences for their consumers and employees.
- **Government:** The Government segment provides government-centric business process services and solutions to U.S. federal, state, local and foreign governments for public assistance, healthcare program administration, transaction processing, eligibility and enrollment processing, payment services and case management. In this segment, the Company helps governments respond to changing rules for eligibility and keep pace with increasing citizen expectations, modernize legacy technology systems, combat benefits fraud and adapt to an evolving regulatory environment.
- **Transportation:** The Transportation segment provides government agencies and transportation authorities around the world with systems, support, and revenue-generating solutions serving toll and fare collections as well as mobility and digital payments that help streamline operations and increase revenue to government transportation agencies. With an expanded focus on sustainability and enhancing the quality of life for citizens and communities around the world, the Company's solutions help reduce congestion and greenhouse emissions, while creating seamless travel experiences for consumers throughout transportation ecosystems.

The following table presents revenues, expenses and segment profit (loss) for the Company's reportable segments:

| (in millions) | Year Ended December 31, Commercial | Government | Transportation | Total[1] |
|---|---|---|---|---|
| **2025** | | | | |
| Segment revenue | $ 1,511 | $ 922 | $ 609 | $ 3,042 |
| Expenses | | | | |
| Wages and benefits | $ 1,002 | $ 383 | $ 251 | $ 1,636 |
| Services and supplies | 202 | 243 | 288 | 733 |
| Rent lease and maintenance expense | 149 | 69 | 48 | 266 |
| Other operating expense | 5 | 7 | 5 | 17 |
| Depreciation and amortization expense | 87 | 45 | 29 | 161 |
| Segment expenses | $ 1,445 | $ 747 | $ 621 | $ 2,813 |
| Segment profit (loss) | $ 66 | $ 175 | $ (12) | $ 229 |
| **2024** | | | | |
| Segment Revenue | $ 1,606 | $ 984 | $ 586 | $ 3,176 |
| Expenses | | | | |
| Wages and benefits | $ 1,081 | $ 420 | $ 256 | $ 1,757 |
| Services and supplies | 212 | 282 | 279 | 773 |
| Rent lease and maintenance expense | 145 | 66 | 46 | 257 |
| Other operating expense | 1 | 6 | 6 | 13 |
| Depreciation and amortization expense | 90 | 44 | 24 | 158 |
| Segment expenses | $ 1,529 | $ 818 | $ 611 | $ 2,958 |
| Segment profit (loss) | $ 77 | $ 166 | $ (25) | $ 218 |
| **2023** | | | | |
| Segment Revenue | $ 1,668 | $ 1,094 | $ 558 | $ 3,320 |
| Expenses | | | | |
| Wages and benefits | $ 1,132 | $ 411 | $ 247 | $ 1,790 |
| Services and supplies | 224 | 284 | 242 | 750 |
| Rent lease and maintenance expense | 140 | 65 | 43 | 248 |
| Other operating expense | 8 | 9 | 10 | 27 |
| Depreciation and amortization expense | 128 | 41 | 23 | 192 |
| Segment expenses | $ 1,632 | $ 810 | $ 565 | $ 3,007 |
| Segment profit (loss) | $ 36 | $ 284 | $ (7) | $ 313 |

[1] *Total excludes Divestitures and Unallocated Costs.*

Other operating expense shown above is primarily comprised of third-party legal fees and other miscellaneous expenses.

The following is a reconciliation of Segment profit (loss) to Income (loss) before income taxes:

| | Year Ended December 31, | | |
|---|---|---|---|
| (in millions) | 2025 | 2024 | 2023 |
| **Segment Profit (Loss)** | $ 229 | $ 218 | $ 313 |
| Reconciling items: | | | |
| Divestitures profit[1] | — | 35 | 103 |
| Unallocated costs[2] | (285) | (287) | (304) |
| Amortization of acquired intangible assets | (2) | (5) | (7) |
| Restructuring and related costs | (35) | (46) | (62) |
| Interest expense | (48) | (75) | (111) |
| Loss on extinguishment of debt | (1) | (8) | — |
| Goodwill impairment | — | (28) | (287) |
| Gain (loss) on divestitures and transaction costs, net | (11) | 696 | (10) |
| Litigation (settlements) recoveries, net | 1 | (9) | 30 |
| Other income (expenses), net | (8) | 13 | 3 |
| **Income (Loss) Before Income Taxes** | $ (160) | $ 504 | $ (332) |

(1) *Divestitures profit is Income (loss) before income taxes.*

(2) *Unallocated Costs includes IT infrastructure costs that are shared by multiple reportable segments, enterprise application costs and certain corporate overhead expenses not directly attributable or allocated to the reportable segments.*

Refer to Note 2 – Revenue for additional information on disaggregated revenues of the reportable segments.

No sales to an individual customer accounted for more than 10% of revenue for the years ended December 31, 2025, 2024 or 2023. Geographic area data is based upon the location of the subsidiary reporting the revenue or long-lived assets and is as follows for each of the years ended December 31:

| | Revenues | | | Long-Lived Assets [1] | |
|---|---|---|---|---|---|
| (in millions) | 2025 | 2024 | 2023 | 2025 | 2024 |
| United States | $ 2,545 | $ 2,887 | $ 3,328 | $ 351 | $ 386 |
| Europe | 298 | 291 | 314 | 30 | 31 |
| Other areas | 199 | 178 | 80 | 92 | 98 |
| **Total Revenues and Long-Lived Assets** | $ 3,042 | $ 3,356 | $ 3,722 | $ 473 | $ 515 |

(1) *Long-lived assets are comprised of (i) Land, buildings and equipment, net, (ii) Internal use software, net, (iii) Product software, net and (iv) Operating lease right-of-use assets.*

## Note 4 – Divestitures

### Divestiture of Casualty Claims Solutions Business

On September 1, 2024, the Company completed the sale of its Casualty Claims Solutions business (collectively referred to as the "Casualty Disposal Group") to MedRisk. The Company received $224 million of cash consideration for this divestiture. In 2024, the Company recorded a gain on the sale of $194 million, which is recorded in Gain (loss) on divestitures and transaction costs, net. Additionally, the Company recorded $33 million of income tax expense related to this divestiture. The revenue generated by the Casualty Disposal Group was $100 million and $146 million for the years ended December 31, 2024 and 2023, respectively.

### Divestiture of Curbside Management and Public Safety Solutions Businesses

On April 30, 2024, Conduent completed the sale of its Curbside Management and Public Safety Solutions businesses (collectively referred to as the "Curbside Disposal Group") to Modaxo, a division of Constellation Software Inc. The Company received $181 million of cash consideration and a $50 million non-interest bearing note payable to the Company that was due and paid on April 30, 2025. Additionally, the Company received

reimbursement for payments made by the Company related to finance lease liabilities and related costs and the reimbursement for the purchase of certain equipment made by the Company on the buyer's behalf. In 2024, the Company recorded a gain on the sale of $103 million, which is recorded in Gain (loss) on divestitures and transaction costs, net. The Company recorded $28 million of income tax expense in connection with the divestiture. The revenue generated by the Curbside Disposal Group was $50 million and $137 million for the years ended December 31, 2024 and 2023, respectively.

**Transfer of BenefitWallet Portfolio**

In September 2023, the Company entered into a Custodial Transfer and Asset Purchase Agreement to transfer its BenefitWallet health savings account and medical savings account portfolio (collectively, the "BenefitWallet Portfolio") to HealthEquity, Inc. The transfer of the BenefitWallet Portfolio closed in multiple tranches from March to May 2024 and the Company received aggregate cash consideration of $425 million as the tranches closed. The Company recorded a gain on the transfer of $425 million, which is recorded in Gain (loss) on divestitures and transaction costs, net. The Company recorded $102 million of income tax expense in connection with the transfer of the BenefitWallet Portfolio. The revenue generated by the BenefitWallet Portfolio was $30 million and $118 million for the years ended December 31, 2024 and 2023, respectively.

## Note 5 - Land, Buildings, Equipment and Software, Net

Land, buildings and equipment, net was as follows:

| (in millions except as noted) | Estimated Useful Lives (Years) | December 31, 2025 | December 31, 2024 |
|---|---|---|---|
| Land | | $ 1 | $ 1 |
| Building and building equipment | 25 to 50 | 5 | 6 |
| Leasehold improvements | Varies | 223 | 214 |
| IT, other equipment and office furniture | 3 to 15 | 907 | 831 |
| Other | 4 to 20 | 2 | 2 |
| Construction in progress | | 13 | 12 |
| Subtotal | | 1,151 | 1,066 |
| Accumulated depreciation | | (970) | (899) |
| Land, Buildings and Equipment, Net | | $ 181 | $ 167 |

Depreciation expense for the years ended December 31, 2025, 2024 and 2023 was $73 million, $80 million and $102 million, respectively.

### Internal Use and Product Software

Internal use and Product software are included in Other long-term assets on the Company's Consolidated Balance Sheets. Additions to Internal use and Product software as well as year-end balances for these assets were as follows:

| (in millions) | Year Ended December 31, | | |
|---|---|---|---|
| Additions to: | 2025 | 2024 | 2023 |
| Internal use software | $ 22 | $ 28 | $ 42 |
| Product software | 23 | 14 | 21 |

| (in millions) | December 31, | |
|---|---|---|
| | 2025 | 2024 |
| Internal use software, at cost | $ 545 | $ 528 |
| Accumulated amortization | (453) | (421) |
| Internal use software, net | $ 92 | $ 107 |
| Product software, at cost | $ 243 | $ 226 |
| Accumulated amortization | (178) | (154) |
| Product software, net | $ 65 | $ 72 |

The useful lives of the Company's Internal use software and enhancements range from one to five years. Product software is amortized over the shorter of: (i) four years; (ii) the expected economic life of the product; or (iii) the term of the associated customer contract. Amortization expense for Internal use and Product software for the years ended December 31, 2025, 2024 and 2023 was $67 million, $79 million and $114 million, respectively. The 2023 amount includes the write-off of capitalized software costs totaling $25 million, stemming from management's decision to abandon an internal use software project and a decision by a customer to not implement a product software solution.

## Note 6 - Leases

The Company has entered non-cancelable operating and finance leases primarily for office space and equipment with lease terms that range from less than one year to 11 years.

The components of lease costs were as follows:

| (in millions) | Year Ended December 31, | | |
|---|---|---|---|
| | 2025 | 2024 | 2023 |
| Finance Lease Costs: | | | |
| Amortization of right of use assets | $ 16 | $ 12 | $ 12 |
| Interest on lease liabilities | 4 | 3 | 2 |
| Total Finance Lease Costs | $ 20 | $ 15 | $ 14 |
| Operating lease costs: | | | |
| Base rent | $ 58 | $ 67 | $ 75 |
| Short-term lease costs | 1 | 1 | 2 |
| Variable lease costs[1] | 19 | 21 | 23 |
| Sublease income | (1) | (1) | — |
| Total Operating Lease Costs | $ 77 | $ 88 | $ 100 |

*(1) Primarily related to taxes, insurance and common area and other maintenance costs for real estate leases.*

Supplemental cash flow information related to leases was as follows:

| (in millions) | Year Ended December 31, 2025 | 2024 | 2023 |
|---|---|---|---|
| Cash paid for the amounts included in the measurement of lease liabilities: | | | |
| Operating cash flows from operating leases | $ 69 | $ 75 | $ 83 |
| Operating cash flows from finance leases | 4 | 2 | 3 |
| Total Cash Flow from Operating Activities | $ 73 | $ 77 | $ 86 |
| | | | |
| Financing cash flow from finance leases | $ 13 | $ 17 | $ 16 |
| | | | |
| Supplemental non-cash information on right of use assets obtained in exchange for new lease obligations: | | | |
| Operating leases | $ 19 | $ 41 | $ 70 |
| Finance leases | $ 35 | $ 19 | $ 21 |

Supplemental balance sheet information related to leases was as follows:

| (in millions) | December 31, 2025 | 2024 |
|---|---|---|
| Operating lease assets: | | |
| Operating lease right-of-use assets | $ 136 | $ 169 |
| Operating lease liabilities: | | |
| Other current liabilities | 52 | 52 |
| Operating lease liabilities | 102 | 138 |
| Total Operating Lease Liabilities | $ 154 | $ 190 |
| | | |
| Finance lease assets: | | |
| Land, buildings and equipment, net | $ 54 | $ 37 |
| Finance lease liabilities: | | |
| Current portion of long-term debt | 13 | 8 |
| Long-term debt | 36 | 18 |
| Total Finance Lease Liabilities | $ 49 | $ 26 |

The weighted average discount rates and weighted average remaining lease terms for operating and finance leases as of December 31, 2025 and 2024 were as follows:

| | December 31, 2025 | | December 31, 2024 | |
|---|---|---|---|---|
| | Operating Leases | Finance Leases | Operating Leases | Finance Leases |
| Weighted average discount rates | 8.6 % | 8.1 % | 8.4 % | 8.7 % |
| Weighted average remaining lease term (in years) | 4 | 4 | 4 | 4 |

Maturities of operating and finance lease liabilities as of December 31, 2025 were as follows:

| (in millions) | December 31, 2025 | |
|---|---|---|
| | Operating Lease Payments | Finance Lease Payments |
| 2026 | $ 61 | $ 16 |
| 2027 | 50 | 15 |
| 2028 | 28 | 15 |
| 2029 | 18 | 9 |
| 2030 | 11 | 2 |
| Thereafter | 14 | — |
| Total undiscounted lease payments | 182 | 57 |
| Less imputed interest | 28 | 8 |
| Present value of lease liabilities | $ 154 | $ 49 |

As of December 31, 2025, the Company entered into additional operating lease agreements for equipment for $6 million, real estate for $19 million and finance leases for equipment for $16 million which have not commenced and have not been recognized on the Company's Consolidated Balance Sheets. These leases are expected to commence in 2026 and 2027 with average lease terms of 4, 9 and 5 years, respectively.

## Note 7 - Goodwill

### Goodwill

The following table presents the changes in the carrying amount of goodwill, by reportable segment:

| (in millions) | Commercial | Government | Transportation | Total |
|---|---|---|---|---|
| **Balance at December 31, 2023** | $ — | $ 623 | $ 28 | $ 651 |
| Foreign currency translation | — | (14) | — | (14) |
| Impairment | — | — | (28) | (28) |
| **Balance at December 31, 2024** | **$ —** | **$ 609** | **$ —** | **$ 609** |
| Foreign currency translation | — | 8 | — | 8 |
| Impairment | — | — | — | — |
| **Balance at December 31, 2025** | **$ —** | **$ 617** | **$ —** | **$ 617** |
| | | | | |
| Gross goodwill | $ 2,198 | $ 1,371 | $ 608 | $ 4,177 |
| Accumulated impairment | (2,198) | (754) | (608) | (3,560) |
| **Balance at December 31, 2025** | **$ —** | **$ 617** | **$ —** | **$ 617** |

### 2025 Impairment Testing

The Company performed its annual goodwill impairment test as of October 1, 2025 for the Government reporting unit. This testing did not identify any goodwill impairment for the Government reporting unit and, accordingly, no impairment charge was recorded.

### 2024 Impairment Testing and Impairment Charge

As part of its 2024 annual goodwill impairment testing, the Company identified a $28 million goodwill impairment for the Transportation reporting unit, which was primarily due to a reduction in projected cash flows from new customer contract signings and increased delivery costs. This represented a full impairment of goodwill for the Transportation reporting unit.

### 2023 Impairment Charge

In September 2023, the Company entered into a Custodial Transfer and Asset Purchase Agreement (the "Purchase Agreement") to transfer its BenefitWallet Portfolio, which was reported within the Company's Commercial segment. Since the Purchase Agreement did not represent a disposition of a business, no goodwill was allocated to the BenefitWallet Portfolio related to this transaction.

Consequently, the Purchase Agreement was identified as a triggering event for the Commercial reporting unit that required the Company to evaluate goodwill for impairment. This evaluation resulted in a full impairment of the Commercial reporting unit's goodwill, totaling $287 million. The impairment charge was primarily driven by the Purchase Agreement and was recognized in the third quarter of 2023.

The fair values of the goodwill impairment charge were estimated based on a determination of the implied fair value of goodwill, leveraging the results from the Income Approach and Market Approach, and are designated as level 3 of the fair value hierarchy.

In connection with the Commercial reporting unit impairment assessment, the Company first performed a recoverability assessment of long-lived assets and concluded that such assets were not impaired.

## Note 8 – Restructuring Programs and Related Costs

The Company engages in a series of restructuring programs related to downsizing its employee base, exiting certain activities, outsourcing certain internal functions and engaging in other actions designed to reduce its cost structure and improve productivity. The implementation of the Company's operational efficiency improvement initiatives has reduced the Company's real estate footprint across all geographies and segments resulting in lease right-of-use asset impairments and other related costs. Although the current program is substantially complete, management continues to evaluate the Company's businesses, and in the future, there may be additional provisions for new plan initiatives and/or changes in previously recorded estimates as payments are made, or actions are completed. Costs associated with restructuring are generally recognized when it has been determined that a liability has been incurred, upon communication to the affected employees or exit from the leased facility.

A summary of the Company's restructuring program activity in the table below for years ended December 31, 2025 and 2024 includes:

- Severance and related costs - employee termination costs, which include severance, retraining and other related contractual benefits;
- Contract termination and other costs - incremental, non-recurring costs related to the consolidation of the Company's data centers, costs associated with bringing certain technology functions in-house, costs related to the discontinuation of software service contracts and non-lease costs associated with exited lease facilities; and
- Asset impairments - non-cash impairments of operating lease right-of-use ("ROU") assets and associated leasehold improvements related to the reduction of the Company's real estate footprint.

| (in millions) | Severance and Related Costs | Contract Termination and Other Costs | Asset Impairments | Total |
|---|---|---|---|---|
| **Balance at December 31, 2023** | $ 9 | $ 1 | $ — | $ 10 |
| Provision | 22 | 19 | 6 | 47 |
| Changes in estimates | (1) | — | — | (1) |
| Total Net Current Period Charges[1] | 21 | 19 | 6 | 46 |
| Charges against reserve and currency | (17) | (18) | (6) | (41) |
| **Balance at December 31, 2024** | $ 13 | $ 2 | $ — | $ 15 |
| Provision | 18 | 12 | 5 | 35 |
| Changes in estimates | — | — | — | — |
| Total Net Current Period Charges[1] | 18 | 12 | 5 | 35 |
| Charges against reserve and currency | (26) | (11) | (5) | (42) |
| **Balance at December 31, 2025** | $ 5 | $ 3 | $ — | $ 8 |

*(1) Represents amounts recognized within the Consolidated Statements of Income (Loss) for the years shown*

No restructuring and related costs are allocated to the segments.

## Note 9 – Supplementary Financial Information

The components of Other assets and Other liabilities were as follows:

| (in millions) | December 31, 2025 | December 31, 2024 |
|---|---|---|
| **Other Current Assets** | | |
| Prepaid expenses | $ 87 | $ 77 |
| Income taxes receivable | 12 | 11 |
| Value-added tax receivable | 8 | 7 |
| Restricted cash | 10 | 11 |
| Net receivables from buyers of divested businesses | 1 | 52 |
| Other | 95 | 103 |
| **Total Other Current Assets** | $ 213 | $ 261 |
| **Other Current Liabilities** | | |
| Accrued liabilities to vendors | $ 147 | $ 156 |
| Litigation related accruals | — | 8 |
| Current operating lease liabilities | 52 | 52 |
| Restructuring liabilities | 8 | 15 |
| Income tax payable | 5 | 3 |
| Other taxes payable | 17 | 16 |
| Accrued interest | 5 | 5 |
| Direct response costs - cyber event liabilities | 8 | — |
| Other | 28 | 35 |
| **Total Other Current Liabilities** | $ 270 | $ 290 |
| **Other Long-term Assets** | | |
| Internal use software, net | $ 92 | $ 107 |
| Intangible assets, net | 12 | 14 |
| Product software, net | 65 | 72 |
| Deferred tax assets | 24 | 23 |
| Other | 73 | 60 |
| **Total Other Long-term Assets** | $ 266 | $ 276 |
| **Other Long-term Liabilities** | | |
| Income tax liabilities | $ 14 | $ 18 |
| Contract liabilities | 69 | 52 |
| Other | 20 | 23 |
| **Total Other Long-term Liabilities** | $ 103 | $ 93 |

## Note 10 – Debt

The Company classifies its debt based on the contractual maturity dates of the underlying debt instruments. The Company defers costs associated with debt issuance over the applicable term. These costs are amortized as interest expense in the Consolidated Statements of Income (Loss).

Long-term debt was as follows:

| (in millions) | Weighted Average Interest Rates at December 31, 2025[1] | December 31, 2025 | December 31, 2024 |
|---|---|---|---|
| Revolving credit facility | 6.58 % | $ 109 | $ — |
| Term loan A due 2026 | n/a | — | 88 |
| Senior notes due 2029 | 6.20 % | 520 | 520 |
| Finance lease obligations | 8.13 % | 49 | 26 |
| Other | 5.45 % | 13 | 12 |
| **Principal Debt Balance** | | $ 691 | $ 646 |
| Debt issuance costs and unamortized discounts | | (4) | (7) |
| Less: current maturities | | (22) | (24) |
| **Total Long-term Debt** | | $ 665 | $ 615 |

*(1) Represents weighted average effective interest rate which includes the effect of discounts and debt issuance costs on issued debt.*

At December 31, 2025, the Company was in compliance with all debt covenants related to the borrowings in the table above.

Scheduled principal payments due on long-term debt for the next five years (in millions) were as follows:

| 2026 | 2027 | 2028 | 2029 | 2030 | Thereafter | Total |
|---|---|---|---|---|---|---|
| $ 22 | $ 13 | $ 124 | $ 530 | $ 2 | $ — | $ 691 |

### 2021 Credit Facilities

On October 15, 2021, the Company refinanced its previously outstanding credit facilities by entering into a new senior secured credit agreement among the Company, its subsidiaries Conduent Business Services, LLC ("CBS"), Conduent State & Local Solutions, Inc. ("CSLS") and Affiliated Computer Services International B.V., the lenders party thereto and Bank of America, N.A., as the administrative agent ("Credit Agreement"). The Credit Agreement contains senior secured credit facilities ("Senior Credit Facilities") consisting of:

(i) Senior Secured Term Loan A ("Term Loan A") with an aggregate principal amount of $265 million, which was paid off in connection with the "2025 Credit Agreement" described below;
(ii) Senior Secured Term Loan B ("Term Loan B") with an aggregate principal amount of $515 million, the previously outstanding balance of which was paid off in 2024; and
(iii) Senior Revolving Credit Facility maturing in 2026, which was amended and replaced by the "2025 Credit Agreement" described below.

### Senior Notes

Concurrent with the Credit Agreement, on October 15, 2021, CBS and CSLS (collectively, the "Issuers") issued 6.00% fixed rate senior notes due 2029 ("Senior Notes"). The Senior Notes are guaranteed on a senior secured basis by the Company and existing and future material direct and indirect wholly owned domestic subsidiaries of CBS that guaranteed the obligations under the Senior Credit Facilities.

Interest is payable semi-annually. Prior to November 1, 2024, the Issuers could redeem the Senior Notes, in whole or in part, at a price equal to the principal amount of the Senior Notes, plus a make-whole premium plus accrued and unpaid interest. The Issuers can redeem the Senior Notes, in whole or in part, at any time on or after November 1, 2024, at the redemption prices specified in the Indenture governing the Senior Notes, plus accrued and unpaid interest, if any, up to but excluding the redemption date. In addition, the Company may be required to make an offer to purchase the notes upon the sale of certain assets and upon a change of control. No Senior Notes were redeemed in 2025 or 2024.

### 2025 Credit Agreement

On August 26, 2025, the Company (as the parent guarantor), the Borrowers, the other guarantors party thereto, the Administrative Agent and the lenders and letter of credit issuers party thereto, entered into an amendment to the 2021 Credit Agreement (“Amendment No. 3” and the 2021 Credit Agreement as amended by Amendment No. 3, the

“2025 Credit Agreement”) to amend the terms of the 2021 Credit Agreement, to, among other things, (i) prepay in full the Term Loan A outstanding under the 2021 Credit Agreement utilizing funds from the Revolving Credit Facility (as defined below), (ii) reduce the amount of the revolving credit facility to $357 million, of which $187 million will mature on August 26, 2028 and the remaining $170 million will continue to mature on October 15, 2026 (as amended, the “Revolving Credit Facility”), (iii) add a new performance letter of credit facility in the amount of approximately $93 million (the “Performance Letter of Credit Facility” and together with the Revolving Credit Facility, the “2025 Credit Facilities”), which will mature on August 26, 2028 and (iv) make certain other changes to the 2021 Credit Agreement as set forth in Amendment No. 3.

The Borrowers may voluntarily repay outstanding loans under the 2025 Credit Facilities at any time without premium or penalty, other than customary breakage costs.

Borrowings under the Revolving Credit Facility bear interest, at the Company's option, at a rate per annum equal to an applicable margin over a base rate or a Secured Overnight Financing Rate ("SOFR"), depending on the type of loan. The applicable margin for the Revolving Credit Facility for SOFR loans range from 1.75% to 3.00% per annum, depending on certain leverage ratios and for base rate loans range from 0.75% to 2.00% per annum.

In addition to paying interest on outstanding principal under the Revolving Credit Facility, the Company is required to pay a commitment fee ranging from 0.30% to 0.55% per annum to the lenders in respect of unutilized commitments thereunder.

Issuances of letters of credit under the Performance Letter of Credit Facility bear interest at a rate per annum equal to an applicable margin. The applicable margin for the Performance Letter of Credit Facility ranges from 1.05% to 1.80% per annum, depending on certain leverage ratios.

In addition to paying fees on outstanding principal under the Performance Letter of Credit Facility, the Company is required to pay a commitment fee ranging from 0.30% to 0.55% per annum to the performance letter of credit issuers in respect of unutilized commitments thereunder.

All obligations under the 2025 Credit Agreement are unconditionally guaranteed by the Company, CBS and CSLS, and the existing and future direct and indirect wholly owned domestic restricted subsidiaries of CBS (subject to certain exceptions). All obligations under the 2025 Credit Agreement are secured, subject to certain exceptions, by a first-priority pledge of substantially all assets of CBS and the subsidiary guarantors, and all of the capital stock of CBS and each of CBS' wholly owned material restricted subsidiaries directly held by CBS and CSLS or a subsidiary guarantor.

The 2025 Credit Agreement contains certain customary affirmative and negative covenants, restrictions, prepayment terms and events of default. It requires the consolidated first lien net leverage ratio to not exceed 4.50 to 1.00 and a fixed charge coverage ratio of greater than or equal to 2.50 to 1.00. If an event of default occurs, the lenders under the 2025 Credit Facilities will be entitled to take various actions, including the acceleration of amounts due under the 2025 Credit Agreement and all actions permitted to be taken by secured creditors under applicable law.

As of December 31, 2025, the Company had $109 million outstanding borrowings under its Revolving Credit Facility. The Company utilized $25 million of the Revolving Credit Facility to issue letters of credit as of December 31, 2025. Additionally, the Company utilized $81 million of the Performance Letter of Credit Facility to issue performance letters of credit as of December 31, 2025. The remaining unused capacity, reflecting total borrowing facility size minus outstanding borrowings and letters of credit, under the Revolving Credit Facility and the Performance Letter of Credit Facility was $223 million and $12 million, respectively, as of December 31, 2025.

In connection with the voluntary repayment of the Term Loan A, the Company wrote-off related debt issuance costs of $1 million, which is included in Loss on extinguishment of debt in the Condensed Consolidated Statements of Income (Loss) for the year ended December 31, 2025. In connection with voluntary prepayments of the Term Loan B made in 2024, the Company wrote-off related debt issuance costs of $6 million, which is included in Loss on extinguishment of debt in the Consolidated Statements of Income (Loss) for the year ended December 31, 2024.

### Interest

Interest paid on short-term and long-term debt amounted to $46 million, $72 million and $106 million for the years ended December 31, 2025, 2024 and 2023, respectively.

Interest expense and interest income were as follows:

| (in millions) | Year Ended December 31, 2025 | 2024 | 2023 |
|---|---|---|---|
| Interest expense | $ 48 | $ 75 | $ 111 |
| Interest income[1] | 7 | 23 | 18 |

*(1) Included in Other (income) expenses, net on the Consolidated Statements of Income (Loss).*

## Note 11 – Financial Instruments

The Company is exposed to market risk from changes in foreign currency exchange rates and interest rates, which could affect operating results, financial position and cash flows. The Company manages its exposure to these market risks through regular operating and financing activities and, when appropriate, using derivative financial instruments. These derivative financial instruments are utilized to hedge economic exposures, as well as to reduce earnings and cash flow volatility resulting from shifts in market rates. The Company enters limited types of derivative contracts to manage foreign currency exposures that it hedges. The primary foreign currency market exposures include the Philippine Peso and Indian Rupee. The fair market values of all the Company's derivative contracts change with fluctuations in interest rates or currency exchange rates and are designed so that any changes in their values are offset by changes in the values of the underlying exposures. Derivative financial instruments are held solely as risk management tools and not for trading or speculative purposes. The related cash flow impacts of all derivative activities are reflected as cash flows from operating activities.

The Company does not believe there is significant risk of loss in the event of non-performance by the counterparty associated with its derivative instruments because these transactions are executed with a major financial institution. Further, the Company's policy is to deal only with counterparties having a minimum investment grade or better credit rating. Credit risk is managed through the continuous monitoring of exposures to such counterparties.

### Summary of Foreign Exchange Hedging Positions

At December 31, 2025 and 2024, the Company had outstanding forward exchange with gross notional values of $163 million and $203 million, respectively. At December 31, 2025, approximately 71% of these contracts mature within three months, 11% in three to six months, 14% in six to twelve months and 4% in greater than 12 months.

The following is a summary of the primary hedging positions and corresponding fair values:

| (in millions) | December 31, 2025 Gross Notional Value | December 31, 2025 Fair Value Asset (Liability)[1] | December 31, 2024 Gross Notional Value | December 31, 2024 Fair Value Asset (Liability)[1] |
|---|---|---|---|---|
| Currencies Hedged (Buy/Sell) | | | | |
| Philippine Peso/U.S. Dollar | $ 61 | $ (1) | $ 67 | $ (1) |
| Indian Rupee/U.S. Dollar | 55 | (1) | 55 | (1) |
| Euro/U.S. Dollar | — | — | 57 | — |
| Mexican Peso/U.S. Dollar | 21 | — | — | — |
| All Other | 26 | — | 24 | — |
| **Total Foreign Exchange Hedging** | $ 163 | $ (2) | $ 203 | $ (2) |

*(1) Represents the net receivable (payable) amount included in the Consolidated Balance Sheets.*

## Note 12 – Fair Value of Financial Assets and Liabilities

Fair value represents the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date. U.S. GAAP established a hierarchy framework to classify the fair value based on the observability of significant inputs to the measurement. The levels of the fair value hierarchy are as follows:

Level 1: Fair value is determined using an unadjusted quoted price in an active market for identical assets or liabilities.

Level 2: Fair value is estimated using inputs other than quoted prices included within Level 1 that are observable, either directly or indirectly.

Level 3: Fair value is estimated using unobservable inputs that are significant to the fair value of the assets or liabilities.

### Summary of Financial Assets and Liabilities Accounted for at Fair Value on a Recurring Basis

The following table represents assets and liabilities measured at fair value on a recurring basis. The basis for the measurement at fair value in all cases was Level 2.

| (in millions) | December 31, 2025 | December 31, 2024 |
|---|---|---|
| **Assets:** | | |
| Foreign exchange contracts - forward | $ — | $ — |
| **Total Assets** | $ — | $ — |
| **Liabilities:** | | |
| Foreign exchange contracts - forward | $ (2) | $ (2) |
| **Total Liabilities** | $ (2) | $ (2) |

### Summary of Other Financial Assets and Liabilities

The estimated fair values of other financial assets and liabilities were as follows:

| | December 31, 2025 | | December 31, 2024 | |
|---|---|---|---|---|
| (in millions) | Carrying Amount | Fair Value | Carrying Amount | Fair Value |
| **Liabilities:** | | | | |
| Long-term debt | $ 665 | $ 592 | $ 615 | $ 588 |

The fair value amounts for Cash and cash equivalents, Restricted cash, Accounts receivable, net and Short-term debt approximate carrying amounts due to the short-term maturities of these instruments.

The fair value of Long-term debt was estimated using quoted market prices for identical or similar instruments (Level 2 inputs).

## Note 13 – Employee Benefit Plans

### Defined Benefit Plans

The Company's remaining benefit obligations and plan assets at December 31, 2025 were $13 million and $0 million, respectively. The Company's benefit obligations and plan assets at December 31, 2024 were $13 million and $0 million, respectively.

### Defined Contribution Plans

The Company has post-retirement savings and investment plans in several countries, including the U.S., U.K. and Canada. In many instances, employees from those defined benefit pension plans that have been amended to freeze future service accruals were transitioned to an enhanced defined contribution plan. In these plans employees are allowed to contribute a portion of their salaries and bonuses to the plans, and the Company matches a portion of the employee contributions.

The Company recorded expenses related to its defined contribution plans of $6 million in 2025, $5 million in 2024 and $11 million in 2023.

## Note 14 - Income Taxes

Income (loss) before income taxes from continuing operations was as follows:

| | Year Ended December 31, | | |
|---|---|---|---|
| (in millions) | 2025 | 2024 | 2023 |
| Domestic income (loss) | $ (224) | $ 461 | $ (349) |
| Foreign income | 64 | 43 | 17 |
| **Income (loss) before income taxes** | $ (160) | $ 504 | $ (332) |

Provision (benefit) for income taxes were as follows:

| | Year Ended December 31, | | |
|---|---|---|---|
| (in millions) | 2025 | 2024 | 2023 |
| **Federal Income Taxes** | | | |
| Current | $ 3 | $ 45 | $ 6 |
| Deferred | (22) | (5) | (41) |
| **Foreign Income Taxes** | | | |
| Current | 25 | 23 | 12 |
| Deferred | — | (7) | (2) |
| **State Income Taxes** | | | |
| Current | 4 | 15 | — |
| Deferred | — | 7 | (11) |
| **Total Provision (Benefit)** | $ 10 | $ 78 | $ (36) |

As allowed by the guidance, the Company has prospectively adopted the new accounting guidance on income taxes concerning effective tax rate reconciliations described in Note 1 – Basis of Presentation and Summary of Significant Accounting Policies for the year ended December 31, 2025. The reconciliation of the U.S. federal statutory income tax rate to the consolidated effective income tax rate for the year ended December 31, 2025 was as follows:

| | Year Ended December 31, 2025 | |
|---|---|---|
| ($ in millions) | Amount | Percent |
| U.S. federal statutory income tax rate | $ (34) | 21.0 % |
| State and local income taxes, net of federal benefit[1] | 2 | (1.5)% |
| Foreign tax effects | | |
| India | | |
| Statutory tax rate difference between India and U.S. | 2 | (1.4)% |
| US/India BAPA transfer pricing agreement | 3 | (2.0)% |
| Other | — | 0.2 % |
| France | | |
| Changes in valuation allowance | 3 | (1.7)% |
| Return to provision adjustments | (2) | 1.3 % |
| Other | 1 | (0.7)% |
| Germany | | |
| Changes in valuation allowance | 2 | (1.2)% |
| Other | — | 0.4 % |
| Other or not specified foreign jurisdictions | 3 | (2.0)% |
| Tax credits | | |
| Research and development tax credits | (6) | 4.2 % |
| Work opportunity tax credit | (3) | 1.7 % |
| Other | — | (0.1)% |
| Change in valuation allowance for deferred tax assets | 36 | (21.8)% |
| Nontaxable or nondeductible items | 2 | (1.5)% |
| Changes in unrecognized tax benefits | 1 | (0.9)% |
| Other[2] | — | (0.1)% |
| **Total Provision and Effective Income Tax Rate** | $ 10 | (6.1)% |

*(1) State taxes in Texas and New York made up the majority (greater than 50%) of the tax effect in this category.*

*(2) In 2025, the "Other" line includes immaterial reconciling items. As such, the Company believes it is appropriate for these items to remain in "Other".*

The reconciliation of the U.S. federal statutory income tax rate to the consolidated effective income tax rate for the years ended December 31, 2024 and 2023 was as follows:

| | Year Ended December 31, | |
|---|---|---|
| | 2024 | 2023 |
| U.S. federal statutory income tax rate | 21.0 % | 21.0 % |
| Nondeductible expenses | 1.8 % | (1.2)% |
| Change in valuation allowance for deferred tax assets | 1.7 % | 0.8 % |
| State taxes, net of federal benefit | 3.6 % | 3.1 % |
| Tax-exempt income, credits and incentives | (0.8)% | 0.8 % |
| Foreign rate differential adjusted for U.S. taxation of foreign profits[1] | 0.1 % | (0.4)% |
| Divestitures | (1.7)% | — % |
| Internal reorganization | (13.4)% | — % |
| Impairments[2] | 0.9 % | (12.2)% |
| Unrecognized tax benefits | 1.7 % | 0.4 % |
| Audit and other tax adjustments | 0.9 % | (1.4)% |
| Other[3] | (0.3)% | (0.2)% |
| **Effective Income Tax Rate** | 15.5 % | 10.7 % |

*(1) The "Foreign rate differential adjusted for U.S. taxation of foreign profits" includes the U.S. tax, net of foreign tax credits, associated with actual and deemed repatriations of earnings from our non-U.S. subsidiaries.*
*(2) Impairment represents adjustments for the non-deductible component of goodwill in 2024 and 2023.*
*(3) In 2024 and 2023, the "Other" line includes immaterial reconciling items. As such, the Company believes it is appropriate for these items to remain in "Other".*

The Company has prospectively adopted the new accounting guidance on income taxes concerning income taxes paid by jurisdiction described in Note 1 – Basis of Presentation and Summary of Significant Accounting Policies for the year ended December 31, 2025. The schedule of net cash paid (refunds received) for income tax by jurisdiction during the year ended December 31, 2025 was as follows:

| (in millions) | Year Ended December 31, 2025 |
|---|---|
| U.S. federal income tax | $ 1 |
| US state and local income tax | 5 |
| Australia | 4 |
| India | 8 |
| Mexico | 3 |
| Peru | 2 |
| United Kingdom | 2 |
| Other foreign jurisdictions | 5 |
| **Net cash paid (refunds received) for income tax** | $ 30 |

On a consolidated basis, the Company paid $44 million and $18 million in combined income taxes to federal, foreign and state jurisdictions during the years ended December 31, 2024 and 2023, respectively.

### Unrecognized Tax Benefits and Audit Resolutions

The Company recognizes tax liabilities when, despite its belief that its tax return positions are supportable, the Company believes that certain positions may not be fully sustained upon review by tax authorities. Each period the Company assesses uncertain tax positions for recognition, measurement and effective settlement. Benefits from uncertain tax positions are measured at the largest amount of benefit that is greater than 50 percent likely of being realized upon settlement. Where the Company has determined that its tax return filing position does not satisfy the more-likely-than-not recognition threshold, the Company has recorded no tax benefits.

The Company is also subject to ongoing tax examinations in numerous jurisdictions due to the extensive geographical scope of its operations. The Company's ongoing assessments of the more-likely-than-not outcomes of the examinations and related tax positions require judgment and can increase or decrease the Company's effective

tax rate, as well as impact its operating results. The specific timing of when the resolution of each tax position will be reached is uncertain.

In the fourth quarter of 2024, the Company implemented an internal reorganization in which it sold a portion of its top tier foreign holding company to a lower tier subsidiary. This transaction and a subsequent tax election to treat the holding company as a partnership resulted in recognition of a built-in capital loss for tax purposes that offset capital gains from divestitures, resulting in net tax savings of $59 million. The determination of the tax characteristic of this transaction requires management to make judgments about the application of tax laws and regulations. The United States Internal Revenue Service could determine a different tax treatment that would have an adverse impact on the Company.

As of December 31, 2025, the Company had $19 million of unrecognized tax benefits that, if recognized, would impact the Company's effective tax rate. Of this amount, $17 million is related to the valuation of the Company's foreign operations used in the calculation of the loss on the internal reorganization mentioned above.

A reconciliation of the beginning and ending amount of unrecognized tax benefits was as follows:

| (in millions) | 2025 | 2024 | 2023 |
|---|---|---|---|
| **Balance at January 1** | $ 19 | $ 10 | $ 12 |
| Additions related to current year | — | 17 | — |
| Additions related to prior years positions | 1 | 2 | — |
| Reductions related to prior years positions | (1) | (9) | (1) |
| Settlements with taxing authorities | — | (1) | (1) |
| Lapse of Statute of limitations | — | — | — |
| **Balance at December 31** | $ 19 | $ 19 | $ 10 |

The Company maintains offsetting benefits from other jurisdictions of $1 million, $2 million and $1 million, at December 31, 2025, 2024 and 2023, respectively. The Company recognized interest and penalties accrued on unrecognized tax benefits within income tax expense. The Company had $1 million, $1 million and $2 million accrued for the payment of interest and penalties associated with unrecognized tax benefits at December 31, 2025, 2024 and 2023, respectively. We are subject to federal income tax examinations in the U.S. and to income tax examinations in various states and foreign jurisdictions. In the U.S., the Company is no longer subject to U.S. federal income tax examinations for years before 2022. With limited exceptions, as of December 31, 2025, we are no longer subject to state, local or foreign examinations by tax authorities for years before 2021.

### Deferred Income Taxes

The Company is indefinitely reinvested in the undistributed earnings of its foreign subsidiaries with respect to the U.S. These foreign subsidiaries have aggregate cumulative undistributed earnings of $60 million as of December 31, 2025. For years after 2017, current tax law allows for certain earnings to be repatriated free from U.S. Federal taxes. However, the repatriation of earnings could give rise to additional tax liabilities. The Company has not provided for these liabilities. The Company has also not provided for deferred taxes on outside basis differences in its investments in its foreign subsidiaries. A determination of the unrecognized deferred taxes related to these other components of the Company's outside basis differences is not practicable. The Company has provided for deferred taxes with respect to certain unremitted earnings of foreign subsidiaries that are not indefinitely reinvested between foreign subsidiaries outside of the U.S.

The tax effects of temporary differences that give rise to significant portions of the deferred taxes were as follows:

| (in millions) | December 31, 2025 | December 31, 2024 |
|---|---|---|
| **Deferred Tax Assets** | | |
| Net operating losses and capital loss carryforward | $ 171 | $ 86 |
| Operating reserves, accruals and deferrals | 42 | 41 |
| Deferred compensation | 3 | 2 |
| Interest expense capitalization | 16 | 11 |
| Settlement reserves | 3 | 5 |
| Operating lease liabilities | 37 | 43 |
| Tax credits | 5 | 10 |
| Capitalized research and experimentation costs | 14 | 24 |
| Compensation related accruals | 17 | 18 |
| Other | 2 | 1 |
| **Subtotal** | 310 | 241 |
| Valuation allowance | (151) | (95) |
| **Total** | $ 159 | $ 146 |
| | | |
| **Deferred Tax Liabilities** | | |
| Intangibles and goodwill | $ 52 | $ 32 |
| Depreciation | 47 | 48 |
| Operating lease right-of-use assets | 32 | 38 |
| Other | 23 | 29 |
| **Total** | $ 154 | $ 147 |
| **Total Deferred Tax Assets (Liabilities), Net** | $ 5 | $ (1) |

The deferred tax assets for the respective periods were assessed for recoverability and, where applicable, a valuation allowance was recorded to reduce the total deferred tax asset to an amount that will, more-likely-than-not, be realized in the future. The net change in the total valuation allowance for the years ended December 31, 2025 and 2024 was an increase of $56 million and a decrease of $5 million, respectively. The valuation allowance relates primarily to certain net operating loss carryforwards, tax credit carryforwards and deductible temporary differences for which the Company has concluded it is more-likely-than-not that these items will not be realized in the ordinary course of operations.

Although realization is not assured, the Company has concluded that it is more-likely-than-not that the deferred tax assets, for which a valuation allowance was determined to be unnecessary, will be realized in the ordinary course of operations based on the available positive and negative evidence, including scheduling of deferred tax liabilities and projected income from operating activities. The amount of the net deferred tax assets considered realizable, however, could be reduced in the near term if actual future income or income tax rates are lower than estimated, or if there are differences in the timing or amount of future reversals of existing taxable or deductible temporary differences.

At December 31, 2025, the Company had tax credit carryforwards of $5 million available to offset future income taxes, which will expire between 2027 and 2043, if not utilized.

The following table presents the Company's worldwide net operating loss carryforwards ("NOLs") as of December 31, 2025 and 2024:

| (in millions) | December 31, 2025 Gross | December 31, 2025 Tax Effected | December 31, 2024 Gross | December 31, 2024 Tax Effected |
|---|---|---|---|---|
| U.S Federal NOLs | $ 310 | $ 65 | $ 2 | $ — |
| U.S. State NOLs | 509 | 26 | 255 | 13 |
| Foreign NOLs | 337 | 77 | 303 | 71 |
| **Total** | $ 1,156 | $ 168 | $ 560 | $ 84 |

The Company has $1,156 million of gross net operating loss carryforwards for income tax purposes including $640 million that will expire between 2026 and 2045, if not utilized, and $516 million available to offset future taxable income indefinitely. The Company had $8 million of foreign capital losses available to offset future capital gains income indefinitely. The Company does not expect to receive a tax benefit for the majority of the NOLs presented above, as valuation allowances have been recorded against most of the state and foreign NOLs and capital losses.

## Note 15 – Contingencies and Litigation

As more fully discussed below, the Company is involved in a variety of claims, lawsuits, investigations and proceedings concerning a variety of matters, including: governmental entity contracting, servicing and procurement law; intellectual property law; employment law; commercial and contracts law; the Employee Retirement Income Security Act ("ERISA"); and other laws and regulations. The Company determines whether an estimated loss from a contingency should be accrued by assessing whether a loss is deemed probable and can be reasonably estimated. The Company assesses its potential liability by analyzing its litigation and regulatory matters using available information. The Company develops its view on estimated losses in consultation with outside counsel handling its defense in these matters, which involves an analysis of potential results, assuming a combination of litigation and settlement strategies. Should developments in any of these matters cause a change in the Company's determination as to an unfavorable outcome and result in the need to recognize a material accrual, or should any of these matters result in a final adverse judgment or be settled for significant amounts in excess of any accrual for such matter or matters, this could have a material adverse effect on the Company's results of operations, cash flows and financial position in the period or periods in which such change in determination, judgment or settlement occurs. The Company believes it has recorded adequate provisions for any such matters as of December 31, 2025. Litigation is inherently unpredictable, and it is not possible to predict the ultimate outcome of these matters and such outcome in any such matters could be more than any amounts accrued and could be material to the Company's results of operations, cash flows or financial position in any reporting period.

Additionally, guarantees, indemnifications and claims arise during the ordinary course of business from relationships with suppliers, customers and non-consolidated affiliates when the Company undertakes an obligation to guarantee the performance of others if specified triggering events occur. Nonperformance under a contract could trigger an obligation of the Company. These potential claims include actions based upon alleged exposures to products, real estate, intellectual property such as patents, environmental matters and other indemnifications. The ultimate effect on future financial results is not subject to reasonable estimation because considerable uncertainty exists as to the outcome of these claims. However, while the ultimate liabilities resulting from such claims may be significant to results of operations in the period recognized, management does not anticipate they will have a material adverse effect on the Company's Consolidated Financial position or liquidity. As of December 31, 2025, the Company had accrued its estimate of liability incurred under its indemnification arrangements and guarantees.

### Litigation Against the Company

***Skyview Capital LLC and Continuum Global Solutions, LLC v. Conduent Business Services, LLC:*** On February 3, 2020, plaintiffs Skyview Capital LLC and Continuum Global Solutions LLC (collectively "Skyview") filed a lawsuit in the Supreme Court of the State of New York, County of New York against Conduent Business Services, LLC ("CBS"), a wholly-owned subsidiary of the Company. The lawsuit relates to the sale of a portion of CBS's select standalone customer care call center business to plaintiffs, which sale closed in February 2019. Under the terms of the sale agreement, CBS received approximately $23 million of promissory notes from plaintiffs (the "Notes"). The lawsuit alleges various causes of action in connection with the acquisition, including: indemnification for breaches of representations and warranties; indemnification for breaches of covenants; and fraud. Plaintiffs alleged that their obligation to mitigate damages and their contractual right of set-off permitted them to withhold and deduct from any amounts that are owed to CBS under the Notes, and plaintiffs sought a judgment that they had no obligation to pay the Notes. On August 20, 2020, CBS filed counterclaims against Skyview seeking the outstanding balance on the Notes, the amounts owed for operating certain Jamaica-based call centers on plaintiffs' behalf pending closing (the "Jamaica Deferred Closing"), other obligations under a transition services agreement and its amendments (the "TSAs"), and late rent payment obligations. CBS also moved to dismiss Skyview's claims in 2020. In May 2021, the court denied the motion to dismiss and allowed Skyview's claims to proceed. Fact and expert discovery concluded and the parties filed summary judgment motions in July 2023. On December 8, 2023, the court rendered its decision on the parties' cross-motions for summary judgment, finding there were certain material issues of fact that required trial on Skyview's fraud claim, and also entering partial summary judgment for each side. On January 5, 2024, CBS filed a notice of appeal with the New York Supreme Court, Appellate Division, First Department ("Appellate

Division") with respect to the portion of the ruling that did not grant CBS's summary judgment motion in its entirety and that granted certain limited relief in favor of Skyview. On January 23, 2024, Skyview filed its own notice of appeal, challenging the decision granting summary judgment on certain of CBS's counterclaims.

In July 2024, Skyview informed CBS of its intention to sell a portion of its call center business. The parties reached an agreement on August 8, 2024, under which, contemporaneously with the closing of such a transaction, Skyview would pay the outstanding principal plus interest due on the outstanding Notes, fully discharging Skyview's obligations under the Notes, and would pay certain of CBS's litigation costs.

On September 24, 2024, Skyview and the buyer announced a signed and binding asset purchase agreement. Following regulatory review, the transaction closed in December 2024, at which point Skyview paid CBS approximately $33 million, representing all outstanding principal and interest due on the Notes and reimbursement of certain litigation costs. As a result, CBS dismissed its two counterclaims related to the Notes.

In May 2025, the Appellate Division heard arguments on the parties' 2024 cross-appeals and issued a ruling in June 2025, finding predominantly in CBS's favor. Specifically, the Appellate Division reversed the trial court's denial of summary judgment as to Skyview's fraud claim and dismissed such claim in its entirety (along with Skyview's request for punitive damages). In addition, the Appellate Division reversed the grant of summary judgment to Skyview on its breach of contract claim, finding there to be issues of fact for trial. No trial date has yet been set. With respect to CBS's counterclaims, the Appellate Division (i) affirmed the grant of summary judgment on the counterclaims concerning the TSAs and late rent payment amounts and (ii) instructed the trial court to adjudicate the final amount owed by Skyview to CBS on the Jamaica Deferred Closing counterclaim. The Appellate Division further found that the maximum amount that Skyview would have been entitled to set off against its liability on the Notes was $5 million (the contractual indemnification limit set forth in the sale agreement).

The trial court accordingly entered judgment on the TSA and late rent payment counterclaims on June 23, 2025, with final entry by the County Clerk on August 20, 2025.

On July 3, 2025, Skyview filed a motion to reargue the Appellate Division's decision and, alternatively, for leave to appeal to the New York Court of Appeals. This motion was denied on September 4, 2025. Conduent is in the process of seeking to collect on the outstanding judgment and will continue to pursue the amount owed by Skyview to CBS on the Jamaica Deferred Closing counterclaim. No trial date has yet been set.

CBS continues to deny all of plaintiffs' allegations, believes that it has strong defenses to all plaintiffs' claims, and will continue to defend the litigation vigorously. The Company is not able to determine or predict the ultimate outcome of this proceeding or reasonably provide an estimate or range of estimates of the possible outcome or loss, if any, in excess of currently recorded reserves.

***In re: Conduent Business Services Data Breach Litigation***

The Company and CBS (collectively, "Conduent") are parties to several lawsuits in the U.S. asserted by or on behalf of individuals who allegedly received a notification letter that their personal information may have been affected by the January 2025 Cyber Event. Most of these lawsuits have been consolidated into one single action in the U.S. District Court, District of New Jersey. Conduent continues to work on consolidating these lawsuits and responding accordingly. Conduent denies plaintiffs' allegations, believes that it has strong defenses to plaintiffs' claims, and will continue to defend the litigations vigorously. The Company is not able to determine or predict the ultimate outcome of this proceeding or reasonably provide an estimate or range of estimates of the possible outcome or loss, if any.

## Guarantees and Indemnifications

### Indemnifications Provided as Part of Contracts and Agreements

***Acquisitions/Divestitures:***

The Company has indemnified, subject to certain deductibles and limits, the purchasers of businesses or divested assets for the occurrence of specified events under certain of its divestiture agreements. In addition, the Company customarily agrees to hold the other party harmless against losses arising from a breach of representations and covenants, including such matters as adequate title to assets sold, intellectual property rights and certain income taxes arising prior to the date of acquisition. Where appropriate, an obligation for such indemnifications is recorded as a liability at the time of the acquisition or divestiture. Since the obligated amounts of these types of

indemnifications are often not explicitly stated or are contingent on the occurrence of future events, the overall maximum amount, or range of amount of the obligation under such indemnifications cannot be reasonably estimated. Other than obligations recorded as liabilities at the time of divestiture, the Company has not historically made significant payments for these indemnifications. Additionally, under certain of the Company's acquisition agreements, it has provided for additional consideration to be paid to the sellers if established financial targets are achieved within specific timeframes post-closing. The Company has recognized liabilities for these contingent obligations based on an estimate of the fair value of these contingencies at the time of acquisition. Contingent obligations related to indemnifications arising from divestitures and contingent consideration provided for by acquisitions are not expected to be material to the Company's financial position, results of operations or cash flows.

***Other Agreements:***

The Company is also party to the following types of agreements pursuant to which it may be obligated to indemnify the other party with respect to certain matters:

- Guarantees on behalf of the Company's subsidiaries with respect to real estate leases. These lease guarantees may remain in effect after the sale of the subsidiary.
- Agreements to indemnify various service providers, trustees and bank agents from any third-party claims related to their performance on the Company's behalf, except for claims that result from the third-party's own willful misconduct or gross negligence.
- Guarantees of the Company's performance in certain services contracts to its customers and indirectly the performance of third parties with whom the Company has subcontracted for their services. This includes indemnifications to customers for losses that may be sustained because of the Company's performance of services at a customer's location.

In each of these circumstances, payment is conditioned on the other party making a claim pursuant to the procedures specified in the particular contract and such procedures also typically allow the Company to challenge the other party's claims. In the case of lease guarantees, the Company may contest the liabilities asserted under the lease. Further, obligations under these agreements and guarantees may be limited in terms of time and/or amount, and in some instances, the Company may have recourse against third parties for certain payments it made.

### Intellectual Property Indemnifications

The Company does not own all of the software that it uses to run its business. Instead, the Company licenses this software from a small number of primary vendors. The Company indemnifies certain software providers against claims that may arise as a result of the Company's use or its subsidiaries', customers' or resellers' use of their software in the Company's services and solutions. These indemnities usually do not include limits on the claims, provided the claim is made pursuant to the procedures required in the services contract.

### Indemnification of Officers and Directors

The Company's corporate by-laws require that, except to the extent expressly prohibited by law, the Company must indemnify its officers and directors against judgments, fines, penalties and amounts paid in settlement and reasonable expenses, including attorneys' fees, incurred in connection with civil or criminal action or proceedings or any appeal, as it relates to their services to the Company and its subsidiaries. Although the by-laws provide no limit on the amount of indemnification, the Company may have recourse against its insurance carriers for certain payments made by the Company. However, certain indemnification payments may not be covered under the Company's directors' and officers' insurance coverage. The Company also indemnifies certain fiduciaries of its employee benefit plans for liabilities incurred in their service as fiduciary whether or not they are officers of the Company. Finally, in connection with the Company's acquisition of businesses, it may become contractually obligated to indemnify certain former and current directors, officers and employees of those businesses in accordance with pre-acquisition by-laws or indemnification agreements or applicable state law.

### Other Contingencies

Certain contracts, primarily in the Company's Government and Transportation segments, require the Company to provide a surety bond or a letter of credit as a guarantee of performance. As of December 31, 2025, the Company had $555 million of outstanding surety bonds issued to secure its performance of contractual obligations with its clients and $130 million of outstanding letters of credit issued to secure the Company's performance of contractual obligations to its clients as well as other corporate obligations. In general, the Company would only be liable for

these guarantees in the event of default in the Company's performance of its obligations under each contract. The Company believes it has sufficient capacity in the surety markets and liquidity from its cash flow and its various credit arrangements to allow it to respond to future requests for proposals that require such credit support.

## Note 16 - Preferred Stock

### Series A Preferred Stock

In connection with the December 31, 2016 separation from the Company's former parent company (the "Separation"), the Company issued 120,000 shares of Series A convertible perpetual preferred stock with an aggregate liquidation preference of $120 million and an initial fair value of $142 million. The Series A convertible preferred stock pays quarterly cash dividends at a rate of 8% per year ($9.6 million per year). Each share of the Series A convertible preferred stock is convertible at any time, at the option of the holder, into 44.9438 shares of common stock for a total of 5,393,000 shares (reflecting an initial conversion price of approximately $22.25 per share of common stock), subject to customary anti-dilution adjustments.

If the closing price of the Company's common stock exceeds 137% of the initial conversion price for 20 out of 30 trading days, the Company has the right to cause any or all of the Series A convertible preferred stock to be converted into shares of common stock at the then applicable conversion rate. The Series A convertible preferred stock is also convertible, at the option of the holder, upon a change in control, at the applicable conversion rate plus an additional number of shares determined by reference to the price paid for the Company's common stock upon such change in control. In addition, upon the occurrence of certain fundamental change events, including a change in control or the delisting of Conduent's common stock, the holder of Series A convertible preferred stock has the right to require the Company to redeem any or all of the Series A convertible preferred stock in cash at a redemption price per share equal to the liquidation preference and any accrued and unpaid dividends to, but not including, the redemption date. As a result of the contingent redemption feature, the Series A convertible preferred stock is classified as temporary equity and reflected separately from permanent equity in the Consolidated Balance Sheets.

## Note 17 – Shareholders' Equity

### Preferred Stock

As of December 31, 2025, the Company had one class of preferred stock outstanding. Refer to Note 16 – Preferred Stock for further information. The Company is authorized to issue approximately 100 million shares of convertible preferred stock at $0.01 par value per share.

### Common Stock

The Company has 1 billion authorized shares of common stock at $0.01 par value per share. At December 31, 2025, 19.5 million shares were reserved for issuance under the Company's incentive compensation plans and 5.4 million shares were reserved for conversion of the Series A convertible preferred stock.

### Stock Compensation Plans

Certain of the Company's employees participate in a long-term incentive plan. The Company's long-term incentive plan authorizes the issuance of restricted stock units / shares and performance stock units / share to employees. Stock-based compensation expense includes expense based on the awards and terms previously granted to the employees.

Stock-based compensation expense was as follows:

| | Year Ended December 31, | | |
|---|---|---|---|
| (in millions) | 2025 | 2024 | 2023 |
| Stock-based compensation expense, pre-tax | $ 19 | $ 19 | $ 19 |
| Income tax benefit recognized in earnings | 3 | 4 | 4 |

**Restricted Stock Units / Shares ("RSUs"):** Compensation expense is based upon the grant date market price. The compensation expense is recorded over the vesting period based on management's estimate of the number of shares expected to vest. The Company's RSU awards typically vest in three separate and equal tranches over a 2.75 year period. Each tranche vests annually, at December 31, following the date of grant.

In 2025, the Company issued 287,000 Deferred Stock Units ("DSU") to non-employee members of the Board of Directors. DSU awards typically vest in accordance with certain service conditions.

**Performance Stock Units / Shares ("PSUs"):** The Company has granted PSUs under various scenarios including:

- PSUs that vest contingent upon its achievement of certain specified financial performance criteria that are averaged over a three-year period. If the three-year actual results exceed the stated targets, then the plan participants have the potential to earn additional shares of common stock, which cannot exceed 50% and 100% of the original grant for the awards granted in 2024 and 2023, respectively. The fair value of these PSUs is based upon the market price of Conduent's common stock on the date of the grant. Compensation expense is recognized over the vesting period, which is 2.75 years from the date of grant, based on management's estimate of the number of shares expected to vest. If the stated targets are not met, any recognized compensation cost would be reversed.
- PSUs that vest contingent upon the increase of Conduent's stock price to certain levels over a 2.75 years period from the date of grant. The number of shares eligible to vest may be adjusted upward or downward by 50% based on total shareholder return, which measures the Company's stock performance relative to the stock performance of the Company's proxy peers over the measurement period. These PSUs also have a service requirement that must be met for them to vest. The fair value of these PSUs is based upon a Monte Carlo simulation, which uses assumptions about the risk free rate and volatility of the Company's stock price at the date of grant. Compensation expense is recognized over the vesting period based on management's estimate of the number of shares expected to vest. The PSUs granted in 2022 were canceled at December 31, 2024 as the performance measures were not met.
- In 2025, for certain senior executives, the Company changed its Annual Performance Incentive Plan ("APIP") cash incentive by awarding a portion of the incentive in PSUs. These shares vest contingent upon: (i) the achievement of the specified 2025 APIP financial performance criteria, and (ii) the meeting of service criteria. The plan participants cannot earn additional shares if APIP performance achievement exceeds 100% of the stated targets. Rather, any overachievement is paid in cash. The fair value of these PSUs is based upon the market price of Conduent's common stock on the date of the grant, June 1, 2025. Compensation expense is recognized over the vesting period, which is 22 months from the date of grant, based on management's estimate of the number of shares expected to vest.

## Summary of Stock-based Compensation Activity

| | 2025 | | 2024 | | 2023 | |
|---|---|---|---|---|---|---|
| (shares in thousands) | Shares | Weighted Average Grant Date Fair Value | Shares | Weighted Average Grant Date Fair Value | Shares | Weighted Average Grant Date Fair Value |
| **Restricted Stock Units / Shares** | | | | | | |
| Outstanding at January 1 | 4,387 | $ 3.67 | 5,031 | $ 4.02 | 3,165 | $ 5.39 |
| Granted | 4,334 | 2.77 | 3,912 | 3.36 | 5,418 | 3.51 |
| Vested | (3,347) | 3.22 | (3,498) | 3.87 | (3,103) | 4.49 |
| Canceled | (1,077) | 3.03 | (1,058) | 3.53 | (449) | 4.26 |
| **Outstanding at December 31** | 4,297 | 3.27 | 4,387 | 3.67 | 5,031 | 4.02 |
| | | | | | | |
| **Performance Stock Units / Shares** | | | | | | |
| Outstanding at January 1 | 5,947 | $ 3.28 | 5,013 | $ 3.97 | 3,097 | $ 5.16 |
| Granted | 7,503 | 2.37 | 3,848 | 3.29 | 3,052 | 3.27 |
| Vested | — | — | — | — | (49) | 1.39 |
| Canceled | (1,528) | 2.81 | (2,914) | 4.47 | (1,087) | 5.52 |
| **Outstanding at December 31** | 11,922 | 2.77 | 5,947 | 3.28 | 5,013 | 3.97 |

The total unrecognized compensation cost related to non-vested stock-based awards at December 31, 2025 was as follows (in millions):

| Awards | Unrecognized Compensation | Remaining Weighted-Average Expense Period (Years) |
|---|---|---|
| Restricted Stock Units / Shares | $ 7 | 1.7 |
| Performance Stock Units / Shares | 8 | 1.4 |
| **Total** | $ 15 | |

The aggregate intrinsic value of outstanding RSUs and PSUs awards were as follows (in millions):

| Awards | December 31, 2025 |
|---|---|
| Restricted Stock Units / Shares | $ 8 |
| Performance Stock Units / Shares | 23 |

The total intrinsic value and actual tax benefit realized for vested stock-based awards were as follows:

| (in millions) | December 31, 2025 | | | December 31, 2024 | | | December 31, 2023 | | |
|---|---|---|---|---|---|---|---|---|---|
| Awards | Total Intrinsic Value | Cash Received | Tax Benefit | Total Intrinsic Value | Cash Received | Tax Benefit | Total Intrinsic Value | Cash Received | Tax Benefit |
| Restricted Stock Units / Shares | $ 7 | $ — | $ 1 | $ 14 | $ — | $ 1 | $ 11 | $ — | $ 2 |
| Performance Stock Units / Shares | — | — | — | — | — | — | — | — | — |

## Note 18 – Other Comprehensive Income (Loss)

Other Comprehensive Income (Loss) is comprised of the following:

| | Year Ended December 31, | | | | | |
|---|---|---|---|---|---|---|
| | 2025 | | 2024 | | 2023 | |
| (in millions) | Pre-tax | Net of Tax | Pre-tax | Net of Tax | Pre-tax | Net of Tax |
| **Currency Translation** | | | | | | |
| Currency translation adjustments, net | $ 34 | $ 34 | $ (37) | $ (37) | $ 31 | $ 31 |
| Translation adjustments gains (losses) | $ 34 | $ 34 | $ (37) | $ (37) | $ 31 | $ 31 |
| **Unrealized Gains (Losses)** | | | | | | |
| Changes in fair value of cash flow hedges gains (losses) | $ (1) | $ (1) | $ (1) | $ (1) | $ 1 | $ 1 |
| **Net Unrealized Gains (Losses)** | $ (1) | $ (1) | $ (1) | $ (1) | $ 1 | $ 1 |
| | | | | | | |
| **Defined Benefit Plans Gains (Losses)** | | | | | | |
| Net actuarial/prior service gains (losses) | $ 2 | $ 2 | $ 1 | $ 1 | $ (1) | (1) |
| **Changes in Defined Benefit Plans Gains (Losses)** | $ 2 | $ 2 | $ 1 | $ 1 | $ (1) | $ (1) |
| | | | | | | |
| **Other Comprehensive Income (Loss)** | $ 35 | $ 35 | $ (37) | $ (37) | $ 31 | $ 31 |

### Accumulated Other Comprehensive Loss ("AOCL")

Below are the balances and changes in AOCL[(1)]:

| (in millions) | Currency Translation Adjustments | Gains (Losses) on Cash Flow Hedges | Defined Benefit Pension Items | Total |
|---|---|---|---|---|
| **Balance at December 31, 2022** | $ (472) | $ 1 | $ 5 | $ (466) |
| Other comprehensive income (loss) before reclassifications | 31 | 1 | (1) | 31 |
| Amounts reclassified from accumulated other comprehensive loss | — | — | — | — |
| Net current period other comprehensive income (loss) | 31 | 1 | (1) | 31 |
| **Balance at December 31, 2023** | $ (441) | $ 2 | $ 4 | $ (435) |
| Other comprehensive income (loss) before reclassifications | (37) | (1) | 1 | (37) |
| Amounts reclassified from accumulated other comprehensive loss | — | — | — | — |
| Net current period other comprehensive income (loss) | (37) | (1) | 1 | (37) |
| **Balance at December 31, 2024** | $ (478) | $ 1 | $ 5 | $ (472) |
| Other comprehensive income (loss) before reclassifications | 34 | (1) | 2 | 35 |
| Amounts reclassified from accumulated other comprehensive loss | — | — | — | — |
| Net current period other comprehensive income (loss) | 34 | (1) | 2 | 35 |
| **Balance at December 31, 2025** | $ (444) | $ — | $ 7 | $ (437) |

(1) *All amounts are net of tax. Tax effects were immaterial.*

## Note 19 – Earnings (Loss) per Share

The Company did not declare any common stock dividends in the periods presented.

The following table sets forth the computation of basic and diluted loss per share of common stock:

| (in millions, except per share data. Shares in thousands) | Year Ended December 31, 2025 | 2024 | 2023 |
|---|---|---|---|
| **Basic Net Earnings (Loss) per Share:** | | | |
| Net Income (Loss) | $ (170) | $ 426 | $ (296) |
| Dividend - Preferred Stock | (10) | (10) | (10) |
| **Adjusted Net Income (Loss) Available to Common Shareholders - Basic** | $ (180) | $ 416 | $ (306) |
| | | | |
| **Diluted Net Earnings (Loss) per Share:** | | | |
| Net Income (Loss) | $ (170) | $ 426 | $ (296) |
| Dividend - Preferred Stock | (10) | — | (10) |
| **Adjusted Net Income (Loss) Available to Common Shareholders - Diluted** | $ (180) | $ 426 | $ (306) |
| Weighted Average Common Shares Outstanding - Basic | 158,422 | 182,513 | 216,779 |
| Common Shares Issuable with Respect to: | | | |
| Restricted Stock and Performance Units / Shares | — | 3,224 | — |
| 8% Convertible Preferred Stock | — | 5,393 | — |
| Weighted Average Common Shares Outstanding - Diluted | 158,422 | 191,130 | 216,779 |
| | | | |
| **Net Earnings (Loss) per Share:** | | | |
| Basic | $ (1.14) | $ 2.28 | $ (1.41) |
| Diluted | $ (1.14) | $ 2.23 | $ (1.41) |
| The following securities were not included in the computation of diluted earnings per share as they were either contingently issuable shares or shares that if included would have been anti-dilutive (shares in thousands): | | | |
| Restricted stock and performance shares/units | 16,916 | 7,731 | 8,652 |
| 8% Convertible preferred stock | 5,393 | — | 5,393 |
| **Total Anti-Dilutive and Contingently Issuable Securities** | 22,309 | 7,731 | 14,045 |

## Note 20 – Related Party Transactions

In the normal course of business, the Company provided services to, and purchased from, certain related parties with the same shareholders. The services provided to these entities included those related to human resources, end-user support and other services and solutions. The purchases from these entities included office equipment and related services and supplies. Revenue and purchases from these entities were included in Revenue and Costs of services or Selling, general and administrative, respectively, on the Company's Consolidated Statements of Income (Loss).

Xerox Corporation ("Xerox") was historically classified as a related party due to significant shares of both Xerox and the Company being held by entities controlled by one individual. As of September 28, 2023, Xerox was no longer considered a related party due to the disposition of all Xerox stock by these entities and, therefore, the Company does not consider transactions with Xerox after that date to be transactions with related parties.

Transactions with related parties were as follows:

| | Year Ended December 31, | | |
|---|---|---|---|
| (in millions) | 2025 | 2024 | 2023 |
| Revenue from related parties | $ — | $ — | $ 6 |
| Purchases from related parties | $ — | $ — | $ 18 |

The Company had no receivable or payable balances with related party entities as of December 31, 2025 and 2024.

## ITEM 9. CHANGES IN AND DISAGREEMENTS WITH ACCOUNTANTS ON ACCOUNTING AND FINANCIAL DISCLOSURE

None.

## ITEM 9A. CONTROLS AND PROCEDURES

### Management's Responsibility for Financial Statements

Management is responsible for the integrity and objectivity of all information presented in this Annual Report on Form 10-K. The consolidated financial statements were prepared in conformity with accounting principles generally accepted in the United States of America and include amounts based on management's best estimates and judgments. Management believes the consolidated financial statements fairly reflect the form and substance of transactions and that the financial statements fairly represent the Company's financial position and results of operations.

The Audit Committee of the Board of Directors, which is composed solely of independent directors, meets regularly with the independent registered public accountants, PricewaterhouseCoopers LLP, the internal auditors and representatives of management to review accounting, financial reporting, internal control and audit matters, as well as the nature and extent of the audit effort. The Audit Committee is responsible for the engagement of the independent registered public accountants. The independent registered public accountants and internal auditors have access to the Audit Committee.

### Disclosure Controls and Procedures

The Company’s management evaluated, with the participation of our principal executive officer and principal financial officer, the effectiveness of our disclosure controls and procedures, as defined in Rules 13a-15(e) and 15d-15(e) under the Securities Exchange Act of 1934, as amended, as of December 31, 2025, the end of the period covered by this Annual Report on Form 10-K. Based on this evaluation, our principal executive officer and principal financial officer have concluded that, as of the end of the period covered by this Annual Report on Form 10-K, our disclosure controls and procedures were effective to ensure that information we are required to disclose in the reports that we file or submit under the Securities Exchange Act of 1934, as amended, is recorded, processed, summarized and reported within the time periods specified in the Securities and Exchange Commission’s rules and forms relating to Conduent Incorporated, including our consolidated subsidiaries, and was accumulated and communicated to the Company’s management, including the principal executive officer and principal financial officer, or persons performing similar functions, as appropriate to allow timely decisions regarding required disclosure.

### Management's Report on Internal Control over Financial Reporting

Management is responsible for establishing and maintaining adequate internal control over financial reporting, as such term is defined in Rules 13a-15(f) and 15d-15(f) promulgated under the Securities Exchange Act of 1934, as amended. Under the supervision and with the participation of our management, including our principal executive officer, principal financial officer and principal accounting officer, we have conducted an evaluation of the effectiveness of our internal control over financial reporting based on the framework in "Internal Control - Integrated Framework" (2013) issued by the Committee of Sponsoring Organizations of the Treadway Commission.

Based on the above evaluation, management concluded that our internal control over financial reporting was effective as of December 31, 2025.

The effectiveness of our internal control over financial reporting as of December 31, 2025 has been audited by PricewaterhouseCoopers LLP, an independent registered public accounting firm, as stated in their report which appears in Part II, Item 8 of this Form 10-K.

### Changes in Internal Control over Financial Reporting

In connection with the evaluation required by paragraph (d) of Rule 13a-15 under the Exchange Act, there was no change identified in our internal control over financial reporting that occurred during the last fiscal quarter ended December 31, 2025 that has materially affected, or is reasonably likely to materially affect, our internal control over financial reporting.

## ITEM 9B. OTHER INFORMATION

### 10b5-1 Plans

During the three months ended December 31, 2025, none of the Company's directors or officers (as defined in Rule 16a-1(f) of the Securities Exchange Act of 1934) adopted, terminated or modified a Rule 10b5-1 trading arrangement or non-Rule 10b5-1 trading arrangement (as such terms are defined in Item 408 of Regulation S-K of the Securities Act of 1933).

## ITEM 9C. DISCLOSURE REGARDING FOREIGN JURISDICTIONS THAT PREVENT INSPECTIONS

Not Applicable.

## PART III

## ITEM 10. DIRECTORS, EXECUTIVE OFFICERS AND CORPORATE GOVERNANCE

The information regarding our executive officers required by Item 10 of Part III is set forth in Item 1 of Part I "Business–Information About Our Executive Officers." The information regarding directors is incorporated herein by reference to the section entitled "Proposal 1 - Election of Directors" in our definitive Proxy Statement to be filed pursuant to Regulation 14A of the Securities Exchange Act of 1934, as amended, for our 2026 Annual Meeting of Stockholders (the "2026 Proxy Statement"). The 2026 Proxy Statement is expected to be filed within 120 days after the end of our fiscal year ended December 31, 2025.

If applicable, the information regarding compliance with Section 16(a) of the Securities and Exchange Act of 1934 is incorporated herein by reference to the section entitled "Delinquent Section 16(a) Reports" of our 2026 Proxy Statement.

The information required by this Item regarding the Audit Committee, its members and the Audit Committee financial experts is incorporated by reference herein from the subsection entitled "Committee Functions, Membership and Meetings" in the section entitled "Board of Directors and Board Committees" in our 2026 Proxy Statement.

The information required by this Item regarding our insider trading policy is incorporated by reference herein from the subsection entitled "Trading, Hedging and Pledging" in our 2026 Proxy Statement.

We have adopted a code of ethics applicable to our principal executive officer, principal financial officer and principal accounting officer (the "Finance Code of Conduct"). The Finance Code of Conduct can be found on our website at: https://www.conduent.com/corporate-governance/ethics-and-compliance/. Information concerning our Finance Code of Conduct can be found under "Corporate Governance" in our 2026 Proxy Statement and is incorporated here by reference. The reference to our website address does not constitute incorporation by reference of any of the information contained on the website, and such information is not a part of this Annual Report.

## ITEM 11. EXECUTIVE COMPENSATION

The information required by this Item included under the following captions in our 2026 Proxy Statement is incorporated herein by reference: “Compensation Discussion and Analysis” (including the “Summary Compensation Table”, “Grants of Plan-Based Awards in 2025”, “Outstanding Equity Awards at 2025 Fiscal Year-End”, “Option Exercises and Stock Vested in 2025”, “Potential Payments upon Termination or Change in Control”, and “Compensation Committee Report” subsections), “Annual Director Compensation” and “Compensation Committee Interlocks and Insider Participation”. The information included under the heading “Compensation Committee Report” in our 2026 Proxy Statement is incorporated herein by reference; however, this information shall not be deemed to be “soliciting material” or to be “filed” with the SEC or subject to Regulation 14A or 14C, or to the liabilities of Section 18 of the Exchange Act.

## ITEM 12. SECURITY OWNERSHIP OF CERTAIN BENEFICIAL OWNERS AND MANAGEMENT AND RELATED STOCKHOLDER MATTERS

Information required by this Item is incorporated herein by reference to the subsections entitled "Securities Ownership," and “Equity Compensation Plan Information” in our 2026 Proxy Statement.

## ITEM 13. CERTAIN RELATIONSHIPS, RELATED TRANSACTIONS AND DIRECTOR INDEPENDENCE

Information required by this Item is incorporated herein by reference to the subsection entitled “Certain Relationships and Related Person Transactions” in our 2026 Proxy Statement. The information regarding director independence is incorporated herein by reference to the subsections entitled “Corporate Governance” and “Director Independence” in the section entitled “Proposal 1 - Election of Directors” in our 2026 Proxy Statement.

## ITEM 14. PRINCIPAL ACCOUNTANT FEES AND SERVICES

The information required by this Item is incorporated herein by reference to the section entitled “Proposal 2 - Ratification of Appointment of Independent Registered Public Accounting Firm” in our 2026 Proxy Statement.

## PART IV

## ITEM 15. EXHIBITS AND FINANCIAL STATEMENT SCHEDULES

(a)

1. Index to Financial Statements filed as part of this report:

   - Report of Independent Registered Public Accounting Firm (PCAOB ID: 238);
   - Consolidated Statements of Income (Loss) for each of the years in the three-year period ended December 31, 2025;
   - Consolidated Statements of Comprehensive Income (Loss) for each of the years in the three-year period ended December 31, 2025;
   - Consolidated Balance Sheets as of December 31, 2025 and 2024;
   - Consolidated Statements of Cash Flows for each of the years in the three-year period ended December 31, 2025;
   - Consolidated Statements of Shareholders' Equity for each of the years in the three-year period ended December 31, 2025;
   - Notes to the Consolidated Financial Statements; and
   - All other schedules are omitted as they are not applicable, or the information required is included in the financial statements or notes thereto.

2. Financial Statement Schedules:

   - Schedule II–Valuation and Qualifying Accounts for each of the three years in the period ended December 31, 2025.

3. The exhibits filed herewith are set forth in the exhibit Index included herein.

(b) Management contracts or compensatory plans or arrangements listed that are applicable to the executive officers named in the Summary Compensation Table which appears in the Registrant's 2026 Proxy Statement or to our directors are preceded by an asterisk (*).

## SCHEDULE II

### Valuation and Qualifying Accounts

No allowances or recoveries for credit losses were recorded for the three years ended December 31, 2025. Activity in tax valuation allowances for the three years ended December 31, 2025 is shown below:

| (in millions) | | Balance at beginning of period | Additions charged to expense | Amounts (credited) charged to other income statement accounts | Deductions and other, net of recoveries | Balance at end of period |
|---|---|---|---|---|---|---|
| **Tax Valuation Allowance[1]:** | | | | | | |
| 2025 | Tax Valuation | 95 | 59 | — | (3) | 151 |
| 2024 | Tax Valuation | 100 | 14 | — | (19) | 95 |
| 2023 | Tax Valuation | 102 | 9 | — | (11) | 100 |

[1] *Tax valuation allowances are primarily related to certain net operating loss carryforwards, tax credit carryforwards and deductible temporary differences for which we have concluded it is more-likely-than-not that these items will not be realized in the ordinary course of operations.*

## ITEM 16. FORM 10-K SUMMARY

None.

## EXHIBIT INDEX

| Exhibit No. | Description | Filed Herewith | Incorporated by Reference | | |
|---|---|---|---|---|---|
| | | | Form | Exhibit No. | Filing Date |
| 2.1 | Custodial Transfer and Purchase Agreement, between Conduent Business Services, LLC and HealthEquity, Inc., dated as of September 18, 2023. | | 8-K | 2.1 | 9/19/2023 |
| 2.2 | First Amendment to Custodial Transfer and Purchase Agreement, between Conduent Business Services, LLC and HealthEquity, Inc., dated as of March 7, 2024. | | 10-Q | 2.2 | 8/7/2024 |
| 3.1 | Restated Certificate of Incorporation of Registrant filed with the Department of the State of New York on December 31, 2016. | | 8-K | 3.1 | 12/23/2016 |
| 3.2 | Amended and Restated By-Laws of Registrant as amended through October 31, 2023. | | 10-Q | 3.2 | 11/1/2023 |
| 4.1 | Indenture, dated as of October 15, 2021, among Conduent Incorporated, Conduent Business Services, LLC, Conduent State & Local Solutions, Inc., Affiliated Business Services International, B.V., the Guarantors party thereto from time to time, the Lenders and L/C Issuers party thereto from time to time and Bank of America, N.A., as Administrative Agent. | | 10-Q | 4.4(g) | 11/4/2021 |
| 4.2 | Description of Securities. | | 10-K | 4.2 | 2/26/2020 |
| 10.1(a) | Credit Agreement, dated as of October 15, 2021, among Conduent Incorporated, Conduent Business Services, LLC, Conduent State & Local Solutions, Inc., Affiliated Computer Services International B.V., the Guarantors party thereto from time to time, the Lenders and L/C Issuers party thereto from time to time and Bank of America, N.A., as Administrative Agent. | | 10-Q | 10.6(f) | 11/14/2021 |
| 10.1(b) | Amendment No. 3 to the Credit Agreement, dated as of August 26, 2025, by and among Conduent Business Services, LLC, Conduent State & Local Solutions, Inc., Affiliated Computer Services International B.V., Conduent Incorporated, the other guarantors party thereto, Bank of America, N.A., as Administrative Agent, Collateral Agent, Swing Line Lender and an L/C Issuer and the lenders party thereto. | | 8-K | 10.1 | 8/27/2025 |
| 10.2(a) | Joinder Agreement to Agreement, dated December 31, 2016, among Conduent Incorporated, Xerox Corporation, Icahn Partners Master Fund LP, Icahn Partners LP, Icahn Onshore LP, Icahn Offshore LP, Icahn Capital LP, IPH GP LLC, Icahn Enterprises Holdings L.P., Icahn Enterprises G.P. Inc., Beckton Corp., High River Limited Partnership, Hopper Investments LLC, Barberry Corp., Jonathan Christodoro and Carl C. Icahn. | | 8-K | 10.6 | 1/3/2017 |
| 10.2(b) | Agreement, dated January 28, 2016, among Xerox Corporation, Icahn Partners Master Fund LP, Icahn Partners LP, Icahn Onshore LP, Icahn Offshore LP, Icahn Capital LP, IPH GP LLC, Icahn Enterprises Holdings L.P., Icahn Enterprises G.P. Inc., Beckton Corp., High River Limited Partnership, Hopper Investments LLC, Barberry Corp., Jonathan Christodoro and Carl C. Icahn. | | Amend-ment 1 to Form 10 | 10.6 | 8/15/2016 |
| 10.3(a) | Exchange Agreement dated October 27, 2016 by and among Darwin A. Deason, Conduent Incorporated and Xerox Corporation. | | Amend-ment 5 to Form 10 | 10.14 | 10/28/2016 |
| 10.3(b) | Shareholders Agreement dated December 18, 2018 by and between Darwin Deason and Conduent Incorporated. | | 8-K | 10.1 | 12/18/2018 |
| *10.4(a)(i) | Form of Restricted Stock Unit Award Agreement 2020 under the PIP. | | 10-Q | 10.6(a)(vi) | 5/8/2020 |
| *10.4(a)(ii) | Form of Performance Restricted Stock Unit Award Agreement 2020 under the PIP. | | 10-Q | 10.6(a)(vii) | 5/8/2020 |

| | | | | |
|---|---|---|---|---|
| *10.4(a)(iii) | Registrant's 2021 Performance Incentive Plan ("2021 PIP"). | DEF 14A | Annex A | 4/9/2021 |
| *10.4(a)(iv) | Form of Restricted Stock Unit Award Agreement 2021 under the 2021 PIP. | 10-Q | 10.6(a)(x) | 8/5/2021 |
| *10.4(a)(v) | Form of Performance Stock Unit Award Agreement 2021 ("Revenue Metric") under the 2021 PIP. | 10-Q | 10.6(a)(xi) | 8/5/2021 |
| *10.4(a)(vi) | Form of Performance Stock Unit Award Agreement 2021 ("Share Hurdle Metric") under the 2021 PIP. | 10-Q | 10.6(a)(xii) | 8/5/2021 |
| *10.4(a)(vii) | Form of Restricted Stock Unit Award Agreement 2022 under the 2021 PIP | 10-Q | 10.6(a)(ix) | 5/3/2022 |
| *10.4(a)(viii) | Form of Performance Restricted Stock Unit Award Agreement 2022 under the 2021 PIP | 10-Q | 10.6(a)(x) | 5/3/2022 |
| *10.4(a)(ix) | Form of Agreement for Non-Employee Directors under 2021 PIP. | 10-Q | 10.6(a)(xiii) | 8/5/2021 |
| *10.4(a)(x) | Registrant's Equity Compensation Plan for Non-Employee Directors dated as of December 15, 2016 ("ECPNED"). | Registration Statement on Form S-8 (No. 333-215361) | 4.4 | 12/29/2016 |
| *10.4(a)(xi) | Form of Restricted Stock Unit Award Agreement 2023 under the 2021 PIP. | 10-Q | 10.6(a)(i) | 5/3/2023 |
| *10.4(a)(xii) | Form of Performance Stock Unit Award Agreement 2023 (Revenue Growth) under the 2021 PIP. | 10-Q | 10.6(a)(ii) | 5/3/2023 |
| *10.4(a)(xiii) | Form of Performance Stock Unit Award Agreement 2023 (rTSR) under the 2021 PIP. | 10-Q | 10.6(a)(iii) | 5/3/2023 |
| *10.4(a)(xiv) | Form of Restricted Stock Unit Award Agreement 2024 under the 2021 PIP | 10-Q | 10.6(a)(i) | 5/2/2024 |
| *10.4(a)(xv) | Form of Performance Stock Unit Award Agreement 2024 (Adjusted Revenue Growth) under the 2021 PIP. | 10-Q | 10.6(a)(ii) | 5/2/2024 |
| *10.4(a)(xvi) | Form of Performance Stock Unit Award Agreement 2024 (rTSR) under the 2021 PIP. | 10-Q | 10.6(a)(iii) | 5/2/2024 |
| *10.4(a)(xvii) | Form of Restricted Stock Unit Award Agreement 2025 under the 2021 PIP. | 10-Q | 10.6(a)(i) | 5/7/2025 |
| *10.4(a)(xviii) | Form of Performance Stock Unit Award Agreement 2025 (Adjusted Revenue Growth) under the 2021 PIP. | 10-Q | 10.6(a)(ii) | 5/7/2025 |
| *10.4(a)(xix) | Form of Performance Stock Unit Award Agreement 2025 for CEO and CFO (Adjusted Revenue Growth CEO and CFO) under the 2021 PIP. | 10-Q | 10.6(a)(iii) | 5/7/2025 |
| *10.4(a)(xx) | Form of Performance Stock Unit Award Agreement 2025 (rTSR) under the 2021 PIP. | 10-Q | 10.6(a)(iv) | 5/7/2025 |
| *10.4(a)(xxi) | Form of APIP Share Award Agreement 2025 under the 2021 PIP. | 10-Q | 10.6(a)(i) | 8/6/2025 |
| *10.4(a)(xxii) | Form of APIP Share Award Agreement 2025 for CEO and CFO under the 2021 PIP. | 10-Q | 10.6(a)(ii) | 8/6/2025 |
| *10.4(b) | Registrant's Amended and Restated Executive Change in Control Severance Plan. | 10-K | 10.4(b) | 2/19/2025 |
| *10.4(c)(i) | Letter Agreement dated May 21, 2019 between Conduent Incorporated and Clifford Skelton regarding compensation arrangements. | 8-K | 10.6(h) | 5/28/2019 |
| 10.4(c)(ii) | Letter Agreement dated August 6, 2019 between Conduent Incorporated and Clifford Skelton regarding compensation arrangements. | 8-K | 10.6(j) | 8/7/2019 |
| *10.4(c)(iii) | Letter Agreement dated February 25, 2020 between Conduent Incorporated and Clifford Skelton regarding compensation arrangements. | 10-K | 10.6(e)(ii) | 2/26/2020 |
| *10.4(c)(iv) | Letter Agreement dated February 23, 2021 between Conduent Incorporated and Clifford Skelton regarding compensation arrangements. | 10-K | 10.6(d)(iii) | 2/24/2021 |

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|---|---|---|---|---|---|
| *10.4(d) | Letter Agreement dated May 5, 2021 between Conduent Incorporated and Stephen Wood regarding compensation arrangements. | | 8-K | 10.1 | 5/5/2021 |
| *10.4(e) | Letter Agreement dated November 5, 2019 between Conduent Incorporated and Michael Krawitz. | | 10-K | 10.6(i) | 2/26/2020 |
| *10.4(f) | U.S. Executive Severance Policy, as amended | | 10-K | 10.4(f) | 2/19/2025 |
| *10.4(g) | Form of Director and Officer Indemnification Agreement | | 10-Q | 10.1 | 11/1/2023 |
| *10.4(h) | Offer Letter Agreement between Harsha V. Agadi and Conduent Incorporated, dated January 16, 2026. | | 8-K | 10.1 | 1/23/2026 |
| *10.4(i) | Restricted Stock Unit Award Agreement between Harsha V. Agadi and Conduent Incorporated, dated January 16, 2026. | | 8-K | 10.2 | 1/23/2026 |
| *10.4(j) | Performance Restricted Stock Unit Award Agreement, between Harsha V. Agadi and Conduent Incorporated dated January 16, 2026. | | 8-K | 10.3 | 1/23/2026 |
| 10.5 | Purchase Agreement dated June 8, 2024, among the Company and the Icahn Parties. | | 8-K | 10.1 | 6/10/2024 |
| 19 | Insider Trading Policy | | 10-K | 19 | 2/21/2024 |
| 21 | List of subsidiaries of Registrant. | X | | | |
| 23 | Consent of PricewaterhouseCoopers LLP. | X | | | |
| 31(a) | Certification of CEO pursuant to Rule 13a-14(a) or Rule 15d-14(a). | X | | | |
| 31(b) | Certification of CFO pursuant to Rule 13a-14(a) or Rule 15d-14(a). | X | | | |
| 32** | Certification of CEO and CFO pursuant to 18 U.S.C. §1350 as adopted pursuant to §906 of the Sarbanes-Oxley Act of 2002. | X | | | |
| 97 | Conduent Incorporated Compensation Recoupment Policy, effective as of October 31, 2023 | | 10-K | 97 | 2/21/2024 |
| 101 | The following materials from the Registrant's Annual Report on Form 10-K for the year ended December 31, 2025 formatted in Inline XBRL: (i) Consolidated Statements of Income, (ii) Consolidated Statements of Comprehensive Income, (iii) Consolidated Balance Sheets, (iv) Consolidated Statements of Cash Flows, (v) Consolidated Statements of Shareholders' Equity and (vi) Notes to Consolidated Financial Statements. | | | | |
| 104 | Cover Page Interactive Data File (formatted as Inline XBRL and contained in Exhibit 101). | | | | |

* Indicates management contract or compensatory plan or arrangement.

** Document has been furnished, is deemed not filed and is not to be incorporated by reference into any of Registrant's filings under the Securities Act of 1933, as amended, or the Securities Exchange Act of 1934, as amended, irrespective of any general incorporation language contained in any such filing.

Pursuant to the requirements of Section 13 or 15(d) of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the undersigned, thereunto duly authorized.

**CONDUENT INCORPORATED**

/s/ HARSHA V. AGADI
**Harsha V. Agadi**
**Chief Executive Officer**

**February 19, 2026**

Pursuant to the requirements of the Securities Exchange Act of 1934, this report has been signed below by the following persons on behalf of the registrant and in the capacities and on the date indicated.

February 19, 2026

| **Signature** | **Title** |
|---|---|
| ***Principal Executive Officer:*** | |
| /s/ HARSHA V. AGADI<br>**Harsha V. Agadi** | President, Chief Executive Officer and Director |
| ***Principal Financial Officer:*** | |
| /s/ GILES GOODBURN<br>**Giles Goodburn** | Executive Vice President and Chief Financial Officer |
| ***Principal Accounting Officer:*** | |
| /s/ GEORGE ABATE<br>**George Abate** | Vice President and Chief Accounting Officer |
| /s/ MICHAEL FUCCI<br>**Michael Fucci** | Director |
| /s/ KATHY HIGGINS VICTOR<br>**Kathy Higgins Victor** | Director |
| /s/ SCOTT LETIER<br>**Scott Letier** | Director |
| /s/ MARGARITA PALÁU-HERNÁNDEZ<br>**Margarita Paláu-Hernández** | Director and Chair of the Board |

## SUBSIDIARIES OF CONDUENT INCORPORATED

The following companies are subsidiaries of Conduent Incorporated as of December 31, 2025. Unless otherwise noted, a subsidiary is a company in which Conduent Incorporated or a subsidiary of Conduent Incorporated holds 50% or more of the voting stock. The names of other subsidiaries have been omitted as they would not, if considered in the aggregate as a single subsidiary, constitute a significant subsidiary:

| Name of Subsidiary | Jurisdiction of Incorporation or Organization |
|---|---|
| Conduent BPO Services, LLC | Delaware |
| Conduent Business Process Optimization Services, Inc. | Texas |
| Conduent Business Services, LLC | Delaware |
| Conduent Care and Quality Solutions, Inc. | Wisconsin |
| Conduent Commercial Solutions, LLC | Nevada |
| Conduent Credit Balance Solutions, LLC | Delaware |
| Conduent EDI Solutions, Inc. | Delaware |
| Conduent Education Services, LLC | Delaware |
| Conduent Export, LLC | Delaware |
| Conduent Federal Solutions, LLC | Delaware |
| Conduent Finance, Inc. | Delaware |
| Conduent Global, Inc. | Delaware |
| Conduent Health Administration, Inc. | Delaware |
| Conduent Healthcare Knowledge Solutions, Inc. | Florida |
| Conduent Healthy Communities Corporation | California |
| Conduent Heritage, LLC | Virginia |
| Conduent HR Services, LLC | Pennsylvania |
| Conduent Human Resource Services, LLC | Delaware |
| Conduent IA, LLC | Delaware |
| Conduent Image Solutions, Inc. | Louisiana |
| Conduent Learning Services, Inc. | Washington |
| Conduent Legal & Compliance Solutions, LLC | Texas |
| Conduent Lending, Inc. | Delaware |
| Conduent Middle East, Inc. | Delaware |
| Conduent Mortgage Services, Inc. | Delaware |
| Conduent Parking, LLC | Delaware |
| Conduent Patient Access Solutions, LLC | New Jersey |
| Conduent Payment Integrity Solutions, Inc. | Delaware |
| Conduent Public Health Solutions, Inc. | Delaware |
| Conduent Public Safety, LLC | Delaware |
| Conduent Securities Services, Inc. | Texas |
| Conduent Securities, LLC | Delaware |
| Conduent State & Local Solutions, Inc. | New York |
| Conduent State Healthcare, LLC | Delaware |
| Conduent TradeOne Marketing, Inc. | Delaware |
| Conduent Transport Solutions, Inc. | Georgia |
| Conduent Wireless Data Services North America, Inc. | Washington |
| ACS China Solutions Hong Kong Limited | Hong Kong |
| ACS Holdings (Germany) GmbH | Germany |
| ACS Solutions Peru, S.A. | Peru |
| Affiliated Computer Services Holdings (Luxembourg) S.A.R.L. | Luxembourg |

| | |
|---|---|
| Affiliated Computer Services International (Barbados) Limited | Barbados |
| Affiliated Computer Services International B.V. | Netherlands |
| Conduent (PTY) LTD | South Africa |
| Conduent Business Process Solutions (France) SAS | France |
| Conduent Business Process Solutions Limited | United Kingdom |
| Conduent Business Services (Australia) PTY, LTD. | Australia |
| Conduent Business Services Canada Inc./Services d'affaires Conduent Canada Inc. | Canada |
| Conduent Business Services de Guatemala, Sociedad Anonima | Guatemala |
| Conduent Business Services India LLP | India |
| Conduent Business Services Italy S.r.l. | Italy |
| Conduent Business Services Malaysia Sdn. Bhd | Malaysia |
| Conduent Business Services Philippines, Inc. | Philippines |
| Conduent Business Services Romania, S.r.l. | Romania |
| Conduent Business Services Switzerland GmbH | Switzerland |
| Conduent Business Services UK Limited | United Kingdom |
| Conduent Business Services, S.L. fka Affiliated Computer Services of Spain, S.L. | Spain |
| Conduent Business Solutions (France) SAS | France |
| Conduent Business Solutions AG | Switzerland |
| Conduent Business Solutions Italia, S.p.A. | Italy |
| Conduent Business Solutions of Puerto Rico, Inc. | Puerto Rico |
| Conduent Colombia, S.A. | Colombia |
| Conduent Consultoria e Serviços de Recursos Humanos Ltda. | Brazil |
| Conduent de Mexico, S.A. de C.V. | Mexico |
| Conduent do Brasil Servicos de Call Center Ltda. | Brazil |
| Conduent Germany Holding GmbH | Germany |
| Conduent Greece Single Member Limited Liability Company | Greece |
| Conduent Holdings (St. Lucia) Ltd | Saint Lucia |
| Conduent Jamaica Limited | Jamaica |
| Conduent Netherlands B.V. | Netherlands |
| Conduent Netherlands Holding B.V. | Netherlands |
| Conduent Poland Sp z.o.o. | Poland |
| Conduent Public Sector UK Limited | United Kingdom |
| Conduent Serviços de Terceirização de Processos de Negócios Ltda. | Brazil |
| Conduent Solutions (Jamaica) Limited | Jamaica |
| Conduent Solutions Mexico, S. de R.L. de C.V. | Mexico |
| Conduent Solutions Philippines, Inc. | Philippines |
| Conduent Technical Service GmbH | Germany |
| Conduent Transit Holdings B.V. | Netherlands |
| Conduent Turkey Müşteri Hizmetleri Limited Şirketi | Turkey |
| Conduent Victoria Ticketing System PTY LTD | Australia |
| Consilience Software Australasia Pty Ltd | Australia |
| Eagle Connect Sh.p.k. | Albania |
| Voice Star Sh.p.k. | Albania |

## CONSENT OF INDEPENDENT REGISTERED PUBLIC ACCOUNTING FIRM

We hereby consent to the incorporation by reference in the Registration Statements on Form S-8 (Nos. 333-215361 and 333-257119) of Conduent Incorporated of our report dated February 19, 2026 relating to the financial statements, financial statement schedule and the effectiveness of internal control over financial reporting, which appears in this Form 10-K.

/s/ PricewaterhouseCoopers LLP

PricewaterhouseCoopers LLP
New York, New York
February 19, 2026

## CEO CERTIFICATIONS

I, Harsha V. Agadi, certify that:

1. I have reviewed this Annual Report on Form 10-K of Conduent Incorporated;

2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;

3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;

4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:

   (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;

   (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;

   (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and

   (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and

5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):

   (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and

   (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

February 19, 2026

/s/ HARSHA V. AGADI

**Harsha V. Agadi**
**Chief Executive Officer**

## CFO CERTIFICATIONS

I, Giles Goodburn, certify that:

1. I have reviewed this Annual Report on Form 10-K of Conduent Incorporated;

2. Based on my knowledge, this report does not contain any untrue statement of a material fact or omit to state a material fact necessary to make the statements made, in light of the circumstances under which such statements were made, not misleading with respect to the period covered by this report;

3. Based on my knowledge, the financial statements, and other financial information included in this report, fairly present in all material respects the financial condition, results of operations and cash flows of the registrant as of, and for, the periods presented in this report;

4. The registrant's other certifying officer and I are responsible for establishing and maintaining disclosure controls and procedures (as defined in Exchange Act Rules 13a-15(e) and 15d-15(e)) and internal control over financial reporting (as defined in Exchange Act Rules 13a-15(f) and 15d-15(f)) for the registrant and have:

   (a) Designed such disclosure controls and procedures, or caused such disclosure controls and procedures to be designed under our supervision, to ensure that material information relating to the registrant, including its consolidated subsidiaries, is made known to us by others within those entities, particularly during the period in which this report is being prepared;

   (b) Designed such internal control over financial reporting, or caused such internal control over financial reporting to be designed under our supervision, to provide reasonable assurance regarding the reliability of financial reporting and the preparation of financial statements for external purposes in accordance with generally accepted accounting principles;

   (c) Evaluated the effectiveness of the registrant's disclosure controls and procedures and presented in this report our conclusions about the effectiveness of the disclosure controls and procedures, as of the end of the period covered by this report based on such evaluation; and

   (d) Disclosed in this report any change in the registrant's internal control over financial reporting that occurred during the registrant's most recent fiscal quarter (the registrant's fourth fiscal quarter in the case of an annual report) that has materially affected, or is reasonably likely to materially affect, the registrant's internal control over financial reporting; and

5. The registrant's other certifying officer and I have disclosed, based on our most recent evaluation of internal control over financial reporting, to the registrant's auditors and the audit committee of the registrant's board of directors (or persons performing the equivalent functions):

   (a) All significant deficiencies and material weaknesses in the design or operation of internal control over financial reporting which are reasonably likely to adversely affect the registrant's ability to record, process, summarize and report financial information; and

   (b) Any fraud, whether or not material, that involves management or other employees who have a significant role in the registrant's internal control over financial reporting.

February 19, 2026

/s/ GILES GOODBURN

**Giles Goodburn**
**Chief Financial Officer**

## CERTIFICATION OF CEO AND CFO PURSUANT TO 18 U.S.C. § 1350, AS ADOPTED PURSUANT TO § 906 OF THE SARBANES-OXLEY ACT OF 2002

In connection with the Form 10-K of Conduent Incorporated, a New York corporation (the "Company"), for the year ended December 31, 2025, as filed with the Securities and Exchange Commission on the date hereof (the "Report"), Harsha V. Agadi, Chief Executive Officer of the Company, and Giles Goodburn, Chief Financial Officer of the Company, each hereby certifies, pursuant to 18 U.S.C. § 1350, as adopted pursuant to § 906 of the Sarbanes-Oxley Act of 2002, to the best of his/her knowledge, that:

(1) The Report fully complies with the requirements of Section 13(a) or 15(d) of the Securities Exchange Act of 1934; and
(2) The information contained in the Report fairly presents, in all material respects, the financial condition and results of operations of the Company.

/s/ HARSHA V. AGADI

**Harsha V. Agadi**
**Chief Executive Officer**
**February 19, 2026**

/s/ GILES GOODBURN

**Giles Goodburn**
**Chief Financial Officer**
**February 19, 2026**

This certification accompanies this Report pursuant to § 906 of the Sarbanes-Oxley Act of 2002 and shall not, except to the extent required by the Sarbanes-Oxley Act of 2002, be deemed filed by the Company for purposes of § 18 of the Securities Exchange Act of 1934, as amended.

A signed original of this written statement required by § 906 has been provided to Conduent Incorporated and will be retained by Conduent Incorporated and furnished to the Securities and Exchange Commission or its staff upon request.

# VI.A.1.c Change of Ownership [RFP VI.A.1.c]

**REQUIREMENT: RFP Section VI.A.1.c**

If any change in ownership or control of the company is anticipated during the twelve (12) months following the solicitation response due date, the bidder should describe the circumstances of such change and indicate when the change will likely occur. Any change of ownership to an awarded bidder(s) will require notification to the State.

***Conduent's stability and experience offer layers of security throughout the project.***

Conduent anticipates no change in ownership or control of the company during the twelve (12) months following the solicitation response due date. Should any change in ownership or control occur during the contract term, Conduent will promptly notify the State in accordance with RFP Section VI.A.1.c.

# VI.A.1.d Office Location [RFP VI.A.1.d]

**REQUIREMENT: RFP Section VI.A.1.d**

The bidder's office location responsible for performance pursuant to an award of a contract with the State of Nebraska should be identified.

Conduent State Healthcare, 100 Campus Drive, Suite 200E, Florham Park, New Jersey 07932 is the office responsible for performance of services under any resulting contract with the State of Nebraska.

Conduent State Healthcare is headquartered at 100 Campus Drive, Suite 200E, Florham Park, New Jersey 07932. As reported in our latest annual report, Conduent has approximately 46,000 employees worldwide. We have a broad national presence with offices in hundreds of cities across the country that we use for operations, research, technical support, with several locations in numerous states. All project work under this opportunity will be performed within the continental U.S.

# VI.A.1.e Relationships with the State [RFP VI.A.1.e]

**REQUIREMENT: RFP Section VI.A.1.e**

The bidder should describe any dealings with the State over the previous (five) (5) years. If the organization, its predecessor, or any Party named in the bidder's solicitation response has contracted with the State, the bidder should identify the contract number(s) and/or any other information available to identify such contract(s). If no such contracts exist, so declare.

## Conduent Contracts with Nebraska

Over the past five (5) years, Conduent has had no contracts with the State of Nebraska. Additionally, predecessors nor any party named in this proposal response has contracted with the State of Nebraska.

# VI.A.1.f Bidder's Employee Relations to State [RFP VI.A.1.f]

**REQUIREMENT: RFP Section VI.A.1.f**

If any Party named in the bidder's solicitation response is or was an employee of the State within the past (twenty-four) (24) months, identify the individual(s) by name, State agency with whom employed, job title or position held with the State, and separation date. If no such relationship exists or has existed, so declare.

If any employee of any agency of the State of Nebraska is employed by the bidder or is a subcontractor to the bidder, as of the due date for solicitation response submission, identify all such persons by name, position held with the bidder, and position held with the State (including job title and agency). Describe the responsibilities of such persons within the proposing organization. If, after review of this information by the State, it is determined that a conflict of interest exists or may exist, the bidder may be disqualified from further consideration in this solicitation. If no such relationship exists, so declare.

***Conduent is vigilant in maintaining relationships that present no conflicts of interest with any existing or anticipated clients, including the State of Nebraska.***

Conduent is not presenting any individuals in our submitted response who have been an employee of the State of Nebraska within the past 24 months. Conduent does not employ any staff of any agency of the State of Nebraska and does not include subcontractors in our delivery of the MDR solution to DHHS.

# VI.A.1.g Contract Performance [RFP VI.A.1.g]

**REQUIREMENT: RFP Section VI.A.1.g**

If the bidder or any proposed subcontractor has had a contract terminated for default during the past (five) (5) years, all such instances must be described as required below. Termination for default is defined as a notice to stop performance delivery due to the bidder's non-performance or poor performance, and the issue was either not litigated due to inaction on the part of the bidder or litigated and such litigation determined the bidder to be in default.

It is mandatory that the bidder submit full details of all termination for default experienced during the past (five) (5) years, including the other Party's name, address, and telephone number. The response to this section must present the bidder's position on the matter. The State will evaluate the facts and will score the bidder's solicitation response accordingly. If no such termination for default has been experienced by the bidder in the past (five) (5) years, so declare.

If at any time during the past (five) (5) years, the bidder has had a contract terminated for convenience, non-performance, non-allocation of funds, or any other reason, describe fully all circumstances surrounding such termination, including the name and address of the other contracting Party.

***Throughout our experience with multiple clients, we have been diligent in delivering on our commitments and maintaining our excellent standing with each.***

## Termination for Default

Conduent has not had a contract terminated for default within the past five (5) years.

## Other Terminations

Over the past five (5) years, Conduent has had no contract terminated for convenience, non-performance, non-allocation of funds, or any other reason.

# VI.A.1.h Summary of Bidder's Corporate Experience [RFP VI.A.1.h]

**REQUIREMENT: RFP Section VI.A.1.h**
The bidder should provide a summary matrix listing the bidder's previous projects similar to this Solicitation in size, scope, and complexity. The State will use no more than three (3) narrative project descriptions submitted by the bidder during its evaluation of the solicitation response.
The bidder should address the following:
i. Provide narrative descriptions to highlight the similarities between the bidder's experience and this Solicitation. These descriptions should include:
a) The time period of the project,
b) The scheduled and actual completion dates,
c) The bidder's responsibilities,
d) For reference purposes, a customer name (including the name of a contact person, a current telephone number, a facsimile number, and e-mail address); and
e) Each project description should identify whether the work was performed as the prime Vendor or as a subcontractor. If a bidder performed as the prime Vendor, the description should provide the originally scheduled completion date and budget, as well as the actual (or currently planned) completion date and actual (or currently planned) budget.
ii. Bidder and Subcontractor(s) experience should be listed separately. Narrative descriptions submitted for Subcontractors should be specifically identified as subcontractor projects.
iii. If the work was performed as a subcontractor, the narrative description should identify the same information as requested for the bidders above. In addition, subcontractors should identify what share of contract costs, project responsibilities, and time period were performed as a subcontractor.

***Conduent's previous projects offered in this proposal highlight the deep experience and success of similar drug rebate administration projects in size, scope, and complexity.***

Conduent has provided federal and supplemental rebate administration services to state Medicaid programs for 27 years. We developed our drug rebate solution in 1999 to support CMS, supplemental, state-only, and commercial rebate programs. We designed our solution to address the evolving and highly regulated requirements of the Medicaid Drug Rebate Program (MDRP). We currently provide rebate services for [redacted]. We have a perfect record; since we began supporting states with their drug rebate program needs, we have never failed to meet a CMS-required deadline. Our Rebate solution empowers us to collect 99% of all rebates invoiced. As an industry leader, our rebate team's operational expertise maximizes rebates by talking to clients daily and providing the right information to the right person at the right time. We collect and pass back to each [redacted] annually from the accounts that allow us to disclose the rebate amount.

Tables VI.A.1.h-1 through VI.A.1.h-3, following, present Conduent's corporate past performance references with contract details and project scopes.

## Corporate References for Past Performances

**Table VI.A.1.h-1.** [redacted])

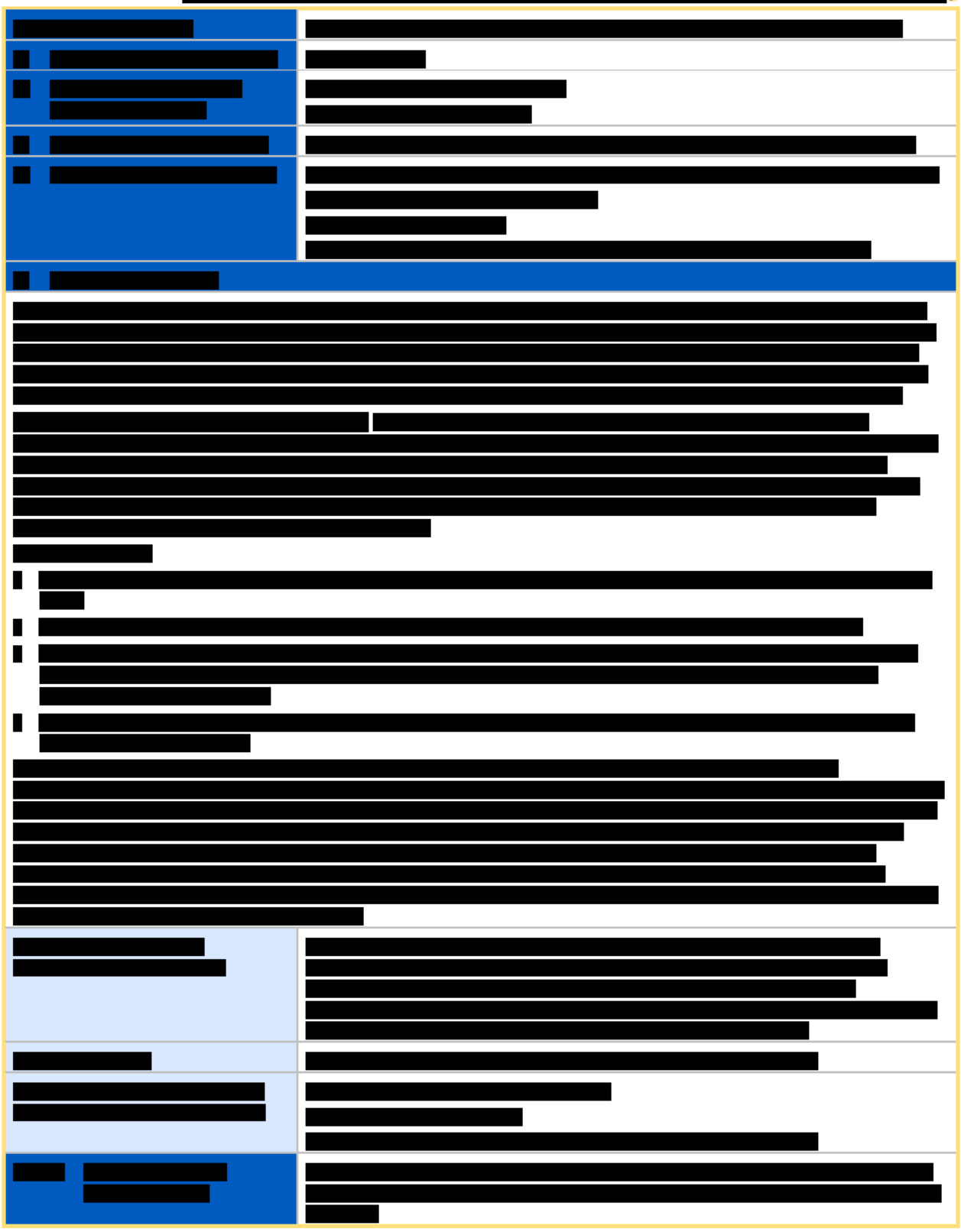


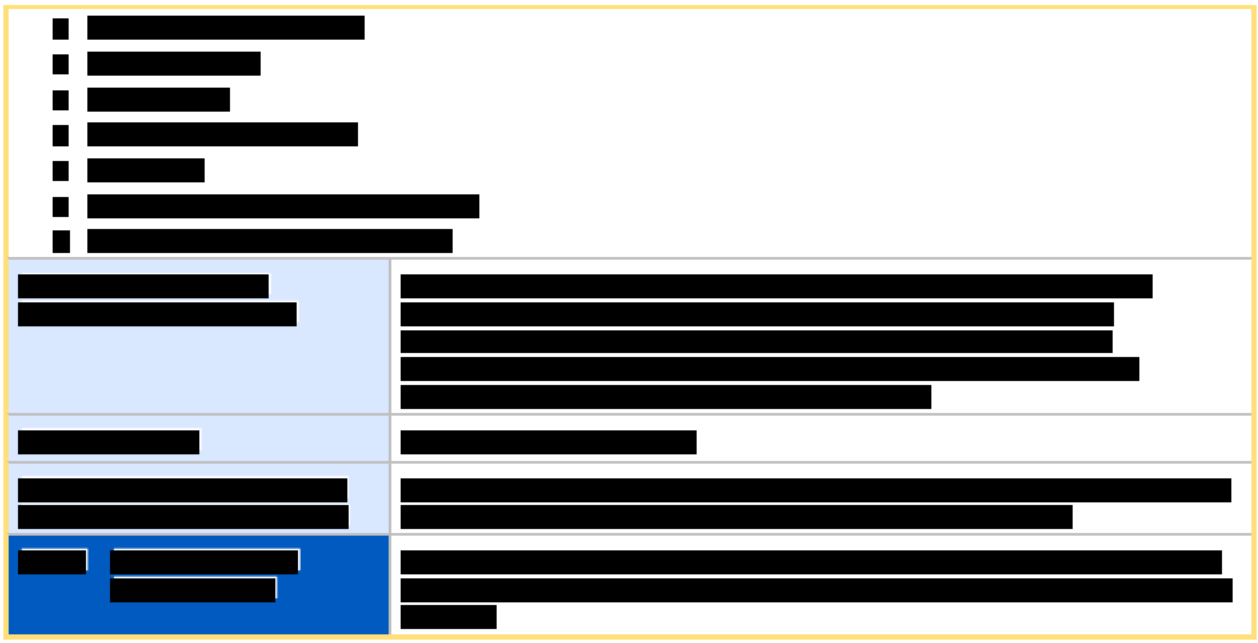
**Table VI.A.1.h-2.** [redacted]



| | |
|---|---|
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |

**Table VI.A.1.h-3. [redacted]**

| | |
|---|---|
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | [redacted] |
| [redacted] | |



# VI.A.1.i Summary of Bidder's Proposed Personnel / Management Approach [RFP VI.A.1.i]

**REQUIREMENT: RFP Section VI.A.1.i**

The bidder should present a detailed description of its proposed approach to the management of the project.

The bidder should identify the specific professionals who will work on the State's project if their company is awarded the contract resulting from this Solicitation. The names and titles of the team proposed for assignment to the State project should be identified in full, with a description of the team leadership, interface, and support functions, and reporting relationships. The primary work assigned to each person should also be identified.

The bidder should provide resumes for all personnel proposed by the bidder to work on the project. The State will consider the resumes as a key indicator of the bidder's understanding of the skill mixes required to carry out the requirements of the Solicitation in addition to assessing the experience of specific individuals.

Resumes should not be longer than three (3) pages. Resumes should include, at a minimum, academic background and degrees, professional certifications, understanding of the process, and at least three (3) references (name, address, and telephone number) who can attest to the competence and skill level of the individual. Any changes in proposed personnel shall only be implemented after written approval from the State.

***Conduent's personnel management approach provides Nebraska DHHS with highly qualified, dedicated staff, clearly defined roles and reporting relationships, and proactive workforce management. This approach promotes continuity, accountability, and effective project execution throughout the contract lifecycle.***

Conduent provides Nebraska DHHS with a disciplined, customer-focused personnel management approach that aligns experienced leadership, functional experts, and support staff under a clearly defined organizational structure.

## Project Team and Staffing Approach




Conduent provides a staffing approach that organizes project leadership, operational resources, and specialized support teams to meet the State's objectives for CMdS administration. Our approach provides the State with a **dedicated team structure** that promotes accountability, clear communication, timely decision-making, and continuity throughout the contract period.

The proposed team combines subject matter experts in rebate operations, clinical services, project management, financial oversight, compliance, quality assurance, training, and technical support to address all aspects of program administration, and system operations. Our organization design provides the staffing and resources necessary for timely, high-quality performance that meets project requirements, and emphasizes clear, direct lines of accountability, communication, and access to decision-makers.

To aid in a seamless transition from implementation to operations, most personnel planned for this project are experienced in MDR program administration and are prepared to transition into their operational responsibilities with minimal ramp-up. This is thanks to recruiting and retaining staff with the right credentials, experience, and attitude to spearhead smooth transitions for our clients.

## *Staffing Management Plan*

Within three weeks of project kickoff, we develop and submit a comprehensive Staffing Management Plan for DHHS review and approval. The plan defines staffing processes, resource allocations, personnel assignments, reporting relationships, workload forecasting, succession planning activities, staffing contingencies, and coverage models for all functional areas. Resource calendars identify staffing commitments by project phase, allowing DHHS to maintain visibility into resource utilization and planned staffing levels throughout the contract lifecycle.

## *Team Structure and Organizational Responsibilities*

Our proposed organization is structured around the operational and technical functions required to support the Nebraska MDR solution. Dedicated leadership, operational, technical, training, and support teams work collaboratively to support implementation and long-term operations.

**A Single Accountable Team**

Our staffing approach provides DHHS with a dedicated team of Medicaid drug rebate, clinical, operational, technical, and project management professionals led by a single point of accountability. By aligning experienced subject matter experts to clearly defined roles and reporting relationships, we provide DHHS with the expertise, continuity, and flexibility needed to achieve program objectives and support long-term success.

To promote efficient collaboration, our project organizational structure aligns leadership and functional resources under clearly defined reporting relationships throughout both the Design, Development, and Implementation (DDI) and Maintenance and Operations (M&O) phases. The Executive Sponsor, Account Manager, Project Manager, and supporting functional resources work together through established communication and escalation pathways that promote accountability, efficient coordination, and timely decision-making. This structure provides DHHS with direct access to subject matter expertise while maintaining clear ownership of assigned responsibilities.

We staff the project with personnel whose qualifications and experience align with their assigned responsibilities. The resumes included with our proposal demonstrate the education, certifications, industry experience, and Medicaid drug rebate expertise necessary to successfully perform the required services. By aligning qualified personnel with specific functional responsibilities, our staffing approach provides the State with the appropriate mix of leadership, operational expertise, clinical knowledge, technical capability, and support services needed to achieve program objectives and sustain long-term success.

Any staffing changes follow the State's approval requirements, and any replacement personnel possess qualifications and experience comparable to or greater than those of the originally proposed resource. This approach supports continuity of service, knowledge retention, and uninterrupted delivery of program services.

## *Project Leadership and Governance*

Conduent establishes a multi-tier governance model to provide strategic oversight, operational management, and day-to-day project coordination. Conduent’s governance structure promotes communication, accountability, decision-making, and successful project execution. This structure provides Nebraska DHHS leadership with timely information while project teams remain focused on execution and issue resolution. Governance activities include regular status meetings, executive reviews, risk assessments, readiness reviews, and escalation management.

## *Cross Training Supports Continuity*

Nebraska's MDR program includes substantial rebate processing volumes, dispute management activities, invoice adjustments, customer support interactions, and CMS reporting obligations. To support this our staffing model incorporates cross-functional resource coverage and succession planning. This supports service continuity regardless of workload fluctuations or personnel transitions. Cross-training, documented operating procedures, knowledge transfer activities, and shared operational responsibilities reduce dependency on any single individual and strengthen program resiliency.

## *Reducing Employee Turn-Over Rates and Standard Attrition*

Conduent maintains high employee retention through professional development opportunities, performance management practices, flexible work arrangements, and a collaborative work environment. These practices support workforce stability and continuity for DHHS.

## *Vacancy Management and Workforce Continuity*

We recognize the importance Nebraska DHHS places on maintaining qualified resources and uninterrupted service. Our staffing management process incorporates workforce planning, succession management, internal talent pools, recruiting partnerships, and knowledge transfer procedures that support continuity throughout the project lifecycle.

When staffing changes occur, project leadership immediately initiates replacement activities and implements continuity procedures. Cross-trained personnel provide interim support while replacement resources are identified and onboarded. Knowledge transfer materials, operational procedures, project documentation, and role-specific transition plans help maintain productivity and service quality during personnel transitions.

Consistent with DHHS requirements, key personnel positions do not remain vacant for more than ten business days without a qualified substitute. DHHS receives written notice of any proposed key personnel changes, and replacement personnel are submitted for review and approval before assignment. Replacement personnel possess qualifications and experience comparable to or exceeding those of the departing resource. We also maintain auditable background check records for all personnel assigned to the project and perform background screening for newly assigned resources throughout the life of the contract.

Should DHHS identify performance concerns involving any assigned individual, project leadership works directly with DHHS to address the issue and implement corrective actions. If replacement becomes necessary, we provide qualified personnel within the timeframe required by the contract while maintaining continuity of project activities and operational services.

### *Operational and Technical Support Resources*

Beyond project implementation activities, the proposed team provides operational and technical resources dedicated to supporting Nebraska's ongoing MDR solution operations. Our rebate operations specialists support manufacturer dispute resolution, invoice reviews, operational reporting, conversion adjustments, monetary invoicing threshold reviews, and coordination with external stakeholders. These resources work as an extension of the DHHS Pharmacy and Drug Rebate teams to support timely processing, collections, dispute management, and operational transparency.

The technical support team provides ongoing support for system functionality, interfaces, reporting, data exchanges, configuration management, maintenance activities, and production operations. These resources monitor system performance, coordinate enhancements, address technical issues, support release activities, and help maintain compliance with operational and security requirements. The team also supports integrations with MMIS, DMA, CMS, IQVIA, and other entities involved in the rebate process.

Training resources provide instructor-led training, knowledge transfer sessions, train-the-trainer programs, user documentation, and ongoing educational support. Security and compliance personnel coordinate access management, audit support, compliance reviews, and security monitoring activities. Together, these resources provide Nebraska DHHS with a comprehensive operational support framework that extends beyond implementation into the ongoing maintenance and administration phases of the contract.

Our staffing management approach focuses on maintaining operational continuity, preserving institutional knowledge, and providing Nebraska DHHS with experienced resources throughout implementation and operations. Staffing requirements are continuously evaluated against project milestones, implementation activities, operational workloads, dispute volumes, reporting cycles, CMS certification activities, and system maintenance requirements. This approach allows project leadership to anticipate resource needs and adjust staffing levels before service delivery is affected.

## A Dedicated Team

We assign a dedicated leadership team to support DHHS throughout the contract term. These professionals are selected because their experience aligns directly with the responsibilities they perform for the State and collectively provides the leadership, operational oversight, project management discipline, and subject matter expertise required to support successful MDR solution operation.

[redacted] provides executive governance and organizational accountability; [redacted] provides Medicaid-focused account leadership, operational oversight, and client relationship management; and [redacted] provides project governance, implementation leadership, and stakeholder coordination. Together, they provide DHHS with executive sponsorship, operational leadership, and project execution capabilities supported by clinical, technical, compliance, quality, training, and rebate administration resources.

DHHS benefits from this dedicated team of Medicaid drug rebate, operational, technical, and project management professionals led by a single point of accountability. By aligning experienced subject matter experts to clearly defined roles and reporting relationships, we provide responsive support, seamless collaboration, and timely resolution of business and operational needs. This structure offers the expertise, continuity, and flexibility needed to support program objectives and long-term success.

### *Account Manager*

Our staffing approach is built around a single point of accountability. The Account Manager, [redacted], serves as the primary interface with the State and provides executive oversight for all contractual, operational, and strategic activities. Working in partnership with DHHS, the Account Manager directs project performance, manages escalated issues, and coordinates resources across all functional areas. This leadership structure gives DHHS direct access to decision-makers while maintaining clear accountability for project outcomes. We demonstrate this in the following organizational charts.



**Figure VI.A.1.i-1. Design, Development, and Implementation (DDI) Organizational Chart**
*Our clear and defined structure supports all DHHS needs during DDI.*



**Figure VI.A.1.i-2. Maintenance and Operations (M&O) Organizational Chart**
*These additional staff bring resources to DHHS to support successful delivery during M&O.*

### *Project Manager*

To support day-to-day operations and project activities, the Project Manager coordinates all workstreams and manages schedules, deliverables, risks, communications, and resource assignments. The Project Manager works closely with DHHS stakeholders and functional leads to maintain alignment across business, technical, operational, and compliance activities. This approach promotes transparency and provides DHHS with consistent reporting and visibility into project performance. Our staffing approach also assigns dedicated functional leaders to critical program areas:

- **Clinical Resources.** Lead supplemental rebate activities, provide therapeutic and financial analyses, and support Preferred Drug List initiatives.
- **Technical Resources.** Oversee system configuration, integrations, security, and ongoing application support.
- **Compliance and Quality Professionals**. Manage certification activities, testing, quality reviews, and performance monitoring.

Together, these specialists provide the expertise necessary to support program operations while allowing DHHS to engage directly with knowledgeable resources in each functional area.

The Executive Sponsor, Account Manager, Project Manager, and supporting operational, technical, clinical, compliance, quality, and training resources work together through established communication and escalation pathways. This approach promotes accountability, efficient coordination, and direct access to subject matter expertise while maintaining clear ownership of assigned responsibilities.

## Identification of Proposed Personnel

Table VI.A.1.i-1 identifies the key personnel assigned to the DHHS project, including their roles, leadership and support responsibilities, reporting relationships, and primary work assignments. Collectively, these individuals provide the executive oversight, account management, project management, operational leadership, and subject matter expertise necessary to support successful Design, Development, and Implementation (DDI) activities as well as ongoing Maintenance and Operations (M&O) services. Resumes for proposed key personnel are included with this proposal in accordance with Solicitation requirements.

**Table VI.A.1.i-1. Key Leadership Personnel**

| Title | Executive Sponsor |
|---|---|
| **Name** | [redacted] |
| **Minimum Qualifications** | Not applicable |
| **Project Role** | Provides executive oversight and strategic direction for the engagement. Serves as the senior executive responsible for contract performance, resource commitment, executive escalation support, and organizational alignment. Provides guidance to project leadership and remains available to DHHS executives for strategic discussions and issue resolution when executive involvement is required. |
| **Leadership, Interface, and Support Functions** | Provides executive oversight to the Account Manager, Project Manager, and supporting teams. Serves as the highest level of escalation within the organization. |
| **Reporting Relationship** | Reports to Conduent executive stakeholders and State/ DHHS leadership |
| **Primary Assignment** | Executive governance, strategic oversight, resource management, executive stakeholder engagement, contract performance oversight, and escalation support. |

| Title | Account Manager/ Project Director |
|---|---|
| **Name** | [redacted] |
| **Minimum Qualifications** | • Five years' contract management experience managing related services with similar budgets, preferably in Medicaid or the healthcare industry and for a project similar in size and scope to this project.<br>• Five years' experience managing activities related to contract administration, correspondence with project clients, dispute resolution, personnel issues, and project reporting.<br>• Five years' experience leading and coordinating project implementation activities, to include evaluation, training, reporting, and recommendation.<br>• Five years' experience conducting project analysis and consultation of marketplace Five years' experience providing project consultation and coordinating changes for major initiatives |
| **Project Role** | Operations Project Manager and Senior Account Manager |
| **Leadership, Interface, and Support Functions** | Serves as DHHS's single/primary point of contact and provides overall operational leadership. Coordinates stakeholder communications, oversees operational performance, facilitates compliance and audit activities, and provides leadership across project and support teams. Has the authority to make decisions binding to the Contract and is responsible for timely completion of the deliverables for the project. Responsible for meeting all contractual obligations. |
| **Reporting Relationship** | Reports to Conduent executive leadership [redacted] and DHHS leadership.<br>Provides oversight of operational and support resources and coordinates activities across functional teams. |
| **Primary Assignment** | Contract administration, operational oversight, stakeholder communication, compliance support, reporting, client relationship management, escalation management, and service delivery coordination. |
| **Title** | **Project Manager** |
| **Name** | [redacted] |
| **Minimum Qualifications** | • Five years' project management experience managing projects of similar size and scope, preferably in Medicaid or the healthcare industry, within the last three years from the release date of the RFP.<br>• Five years' experience managing Systems Development Life Cycle (SDLC) for projects of similar size and scope of this RFP.<br>• Five years' experience initiating and managing an MDR system implementation, or comparable experience with capabilities of overseeing all contracted activities in a project of similar size and scope of this RFP.<br>Project Management Professional (PMP) certification through the Project Management Institute (PMI) is preferred. |
| **Project Role** | Project Manager |
| **Leadership, Interface, and Support Functions** | Leads project governance and day-to-day project execution for Medicaid pharmacy and drug rebate programs. Serves as DHHS's<br>primary point of contact for matters relating to the project and serves as a liaison for project stakeholders. Coordinates project activities, stakeholders, and supporting resources while managing schedules, communications, risks, issues, and deliverables. Supports use of Microsoft Project and/or DHHS recommended software for managing daily activities.<br>Brings extensive experience managing projects through all phases of the Systems Development Life Cycle (SDLC), directing complex technology initiatives, overseeing multidisciplinary teams, and supporting implementation of large-scale healthcare solutions |
| **Reporting Relationship** | Reports to the Account Manager and works closely with the Executive Sponsor regarding project performance, risks, milestones, and key decisions. Coordinates activities across all functional areas. |
| **Primary Assignment** | Project planning, implementation oversight, schedule management, risk management, stakeholder communications, resource coordination, project governance, and status reporting. |

## *Operational Support Resources*

Beyond project implementation activities, the proposed team provides operational and technical resources dedicated to supporting Nebraska's ongoing MDR operations. The functional support resources provide specialized expertise across clinical services, technical operations, compliance, quality management, training, and rebate administration. Each functional resource works closely with project leadership, maintaining clearly defined responsibilities and reporting relationships. This structure establishes clear accountability, streamlined communication, and access to subject matter expertise across all areas of program administration for DHHS.

Our rebate operations specialists support manufacturer dispute resolution, invoice reviews, operational reporting, conversion adjustments, monetary invoicing threshold reviews, and coordination with external stakeholders. These resources work as an extension of the DHHS Pharmacy and Drug Rebate teams to support timely processing, collections, dispute management, and operational transparency.

The technical support team provides ongoing support for system functionality, interfaces, reporting, data exchanges, configuration management, maintenance activities, and production operations. These resources monitor system performance, coordinate enhancements, address technical issues, support release activities, and help maintain compliance with operational and security requirements. The team also supports integrations with MMIS, DMA, CMS, IQVIA, and other entities involved in the rebate process.

The Account Manager and leadership team are supported by these specialized functional resources who provide the expertise required to administer, support, and continuously improve MDR solution operations as seen previously in Figure VI.A.1.i-2, Maintenance and Operations Organizational Chart.

We include summary information about these Conduent personnel who work with our key staff to support the NE MDR project in Table VI.A.1.i-2. These individuals provide our project team with a strong resource base from which to pull should needs arise over the life of the contract.

**Table VI.A.1.i-2. Conduent Support Personnel**

| Resource Role | Project Phase | Functional Area | Primary Assignment |
|---|---|---|---|
| CMS Certification Lead | DDI / Certification | Compliance and Certification | CMS certification planning, readiness reviews, certification support, and implementation compliance activities. |
| Business Analysts | DDI and Operations | Business Analysis | Requirements management, business process analysis, stakeholder coordination, and operational support. |
| Developers | DDI and Operations | Technical Services | System configuration, development, enhancements, testing support, and implementation activities. |
| Infrastructure & Security Resources | DDI & Operations | Technical Services | Environment support, security administration, production operations, and infrastructure maintenance. |
| Quality Assurance Resources | DDI and Operations | Software Quality Assurance | Supports software testing, quality reviews, defect validation, and verification of system functionality. |

| Resource Role | Project Phase | Functional Area | Primary Assignment |
|---|---|---|---|
| Reporting Analyst | Operations | Reporting & Analytics | Supports ongoing operational reporting and data quality activities, helping ensure accurate, complete, and timely program reporting for DHHS. |
| Pharmacy Rebate Specialists | Operations | Rebate Administration | Rebate processing, dispute management, invoice review, manufacturer communications, and operational support. |
| Accounting Specialists | Operations | Financial Administration | Financial and accounting activities supporting ongoing MDR operations. |
| Mailroom Clerk | Operations | Mail Operations | Supports outbound mail preparation, coordination, and processing. |

## *Resumes for Proposed Personnel*

We include resumes for key personnel assigned to the project. The resumes demonstrate the qualifications, experience, education, certifications, and expertise required to perform the services described in this Solicitation. The resumes also demonstrate our understanding of the skill mix necessary to support Medicaid Drug Rebate Program operations and provide DHHS with experienced leadership across account management, project management, operational support, compliance, technical services, and program administration functions.

The proposed team combines complementary experience across executive leadership, Pharmacy Benefits Management, Medicaid operations, project management, technical services, compliance, training, quality management, and business support functions. Together they provide DHHS with a comprehensive team capable of supporting all aspects of the MDR solution.

Each proposed resume complies with the Solicitation requirements detailed. The resumes are found in Sections VI.A.1.i.1 and VI.A.1.i.2 of this submission.

## *Personnel Change Management*

We recognize the importance of continuity, institutional knowledge, and consistent leadership throughout the contract term. Any changes to proposed personnel are submitted to DHHS for review and implemented only after receiving written approval from the State.

### *Commitment to Nebraska DHHS*

Our staffing approach provides Nebraska DHHS with experienced leadership, a dedicated MDR solution operations team, a disciplined governance structure, specialized technical expertise, and proactive staffing management processes. We provide clearly defined reporting relationships, comprehensive workforce planning, succession management, vacancy coverage procedures, knowledge transfer activities, and operational accountability. We provide the resources necessary to support successful implementation, CMS certification, operational readiness, dispute resolution, system maintenance, and long-term administration of Nebraska's MDR solution.

# VI.A.1.i.1 Account Manager [RFP V.D.2.g]

**REQUIREMENT: RFP Section V.D.2.g**

Must be the single point of contact for matters concerning performance under the Contract. Account Manager must have the authority to make decisions that are binding to the Contract, held responsible for timely completion of the deliverables for the project, and shall be responsible for meeting all contractual obligations. Include the approach to account management and describe how the account manager will meet this requirement.

Account Manager minimum qualifications:

i. A minimum of five (5) years' contract management experience managing related services with similar budgets, preferably in Medicaid or the healthcare industry and for a project similar in size and scope to this project.

ii. Minimum five (5) years' experience managing activities related to contract administration,

correspondence with project clients, dispute resolution, personnel issues, and project reporting.

iii. Minimum five (5) years' experience leading and coordinating project implementation activities, to include evaluation, training, reporting, and recommendations.

iv .Minimum five (5) years' experience conducting project analysis and consultation of marketplace and impact changes.

v. Minimum five (5) years' experience providing project consultation and coordinating changes for major initiatives.

***Conduent provides Nebraska DHHS with a single accountable leader empowered to make decisions, resolve issues, coordinate resources, and oversee fulfillment of all contractual commitments, performance standards, and project deliverables.***

With one single point of contact, accountable leader and clear governance, Conduent accelerates decision making and streamlines communication across all stakeholders.

## Account Management Approach

[redacted] Your account manager, [redacted], Director of Account Management, serves DHHS as a single point of accountability. Our account management approach prioritizes providing the State with highly responsive, strong partners that bring proven leadership to Nebraska. [redacted] has full authority to make decisions binding to the Contract, direct Conduent resources, and coordinate cross-functional activities. He is responsible for meeting all contractual obligations and serves as the authorized representative empowered to take actions necessary to maintain contract compliance.

**Single Point of Accountability**

**Account Manager:** [redacted]

Conduent assigns a dedicated Account Manager who serves as Nebraska DHHS's single point of contact for all matters related to contract performance, service delivery, issue resolution, and operational oversight.

**Account Management Methodology.** Our account management approach emphasizes proactive engagement, executive visibility, operational accountability, and continuous communication. [redacted] serves as DHHS's primary point of contact and authorized representative for contract performance matters. The account manager applies a proactive account management approach to oversee contract compliance, deliverables, resource coordination, performance reporting, governance activities, continuous service improvement and risk, issue, and escalation management. He communicates between DHHS and Conduent leadership, supports governance activities and executive reviews. operational readiness, issue resolution, and alignment with business objectives.

**Governance and Reporting.** [redacted] participates in governance forums and provides reporting on project status, performance metrics, risks, issues, milestones, and contractual obligations. [redacted] serves as the primary escalation point for issues and coordinates resolution through established governance processes. He works closely with Project Manager [redacted] to align project activities with DHHS priorities. Executive oversight, performance reviews, compliance monitoring, stakeholder engagement, and deliverable management support strong contract governance.

## Account Manager Qualifications

Conduent's proposed Account Manager, [redacted], Director of Account Management, meets or exceeds all minimum qualifications specified by Nebraska DHHS. He is a seasoned Account and Project Manager with over 15 years of experience supporting Medicaid pharmacy operations, pharmacy benefit management (PBM) services, and healthcare technology programs through the Massachusetts Pharmacy Online Processing Solution (POPS) program.

During his tenure with Conduent, he has advanced through progressively responsible roles, including Business Analyst, Interface Manager/Business Analyst, Deputy Account Manager, and Account Manager. His experience encompasses contract administration, project management, compliance oversight, operational leadership, stakeholder engagement, and technology implementation within a complex Medicaid healthcare environment.

**Healthcare and Medicaid Contract Management Experience.** [redacted] has over 15 years of experience supporting MassHealth Medicaid pharmacy operations and 12+ years in leadership roles. He was responsible for contract administration, operational oversight, and service delivery for the POPS program. In this role, he managed daily contract operations, coordinated local staff and resources, and maintained compliance with contractual requirements. As the primary liaison, the Drug Utilization Review program, and EOHHS, [redacted] partnered with client leadership to monitor performance, resolve operational issues, and ensure successful contract execution.

**Contract Administration, Compliance, Personnel Management, and Performance Reporting.** [redacted] 12+ years of experience managing contract administration activities include contract compliance, personnel management, and performance reporting. As Deputy Account Manager and Account Manager, he facilitated regular communications with EOHHS contract and project managers. He provided project status reports, coordinated weekly meetings, and monitored performance against contractual requirements. Responsibilities included staffing oversight, resource management, and compliance with MassHealth policies, regulations, and contract deliverables. Additional duties included coordinating annual third-party audits, disaster recovery testing, and other compliance activities supporting program readiness and accountability.

**Project Implementation Leadership.** [redacted] brings more than 15 years of experience leading project implementations and operational improvement initiatives. Responsibilities have included project planning, stakeholder coordination, milestone tracking, and governance facilitation. Experience also includes managing change requests, defining business requirements, coordinating testing and implementation activities, and monitoring project progress. Client approval of system enhancements, readiness activities, project reporting, and cross-functional team coordination have supported successful business and technology initiatives.

**Evaluation of Regulatory Requirements and Organizational Impact.** Throughout his tenure supporting MassHealth pharmacy operations, [redacted] worked within a highly regulated Medicaid environment and has evaluated regulatory requirements, policy updates, operational impacts, and system changes to support effective program administration. Responsible for compliance with MassHealth policies governing pharmacy operations and system compliance, he supported program changes to meet evolving business and regulatory requirements. His expertise in Medicaid pharmacy operations, drug rebates, claims processing, and healthcare technology supports impact analysis and informed decision-making.

**Consultative Support and Change Management.** [redacted] provides consultative support and leads organizational, operational, and technology changes for Medicaid initiatives. Close collaboration with stakeholders enables the successful implementation of system enhancements, operational improvements, and compliance-driven changes. Deep Medicaid program knowledge and technical expertise support effective change management, operational readiness, and successful implementations.

**Dedicated Accountability for Nebraska DHHS.** As the primary liaison between Conduent and Nebraska DHHS, [redacted] coordinates leadership, project, operational, and technical teams. To support continuity and maintain institutional knowledge, Conduent does not replace the designated Account Manager without prior written approval from Nebraska DHHS. A qualified backup resource is also identified to make sure you have uninterrupted support and continuity of service throughout the contract term.

## Academic Background

| Degree | University | Years Attended |
|---|---|---|
| Master of Science, Information Technology Management | Harvard University | 2004 – 2008 |
| Bachelor of Science, Computer and Electrical Engineering | Suffolk University | 2000 – 2004 |

## Professional References

| [redacted] | [redacted] | [redacted] |
|---|---|---|
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |

# VI.A.1.i.2 Project Manager [RFP V.D.2.g]

**REQUIREMENT: RFP Section V.D.2.g**
Must represent and oversee the day-to-day activities of the project. Serve as DHHS's primary point of contact for matters relating to the project and serve as a liaison for project stakeholders. DHHS preference is the use of Microsoft Project or other state-approved software. Project Manager must include acceptance of Microsoft Project and/or recommended software for managing daily activities.
Project Manager minimum qualifications:
i. A minimum of five (5) years' project management experience managing projects of similar size and scope, preferably in Medicaid or the healthcare industry, within the last three (3) years from the release date of the RFP.
ii. Minimum five (5) years' experience managing Systems Development Life Cycle (SDLC) for projects of similar size and scope of this RFP.
iii. Minimum five (5) years' experience initiating and managing an MDR system implementation, or comparable experience with capabilities of overseeing all contracted activities in a project of similar size and scope of this RFP.
iv. Project Management Professional (PMP) certification through the Project Management Institute (PMI) is preferred

***Conduent's Project Manager brings extensive Medicaid Drug Rebate (MDR) implementation experience, proven project leadership, and a successful history supporting complex Medicaid initiatives.***

The Nebraska Department of Health and Human Services (DHHS) is seeking staff who are qualified in all aspects of MDR and meet the requirements and expectations to deliver quality service.

**Experienced Leadership. Proven Results.**

- 27+ years supporting Medicaid Drug Rebate programs nationwide
- PMBOK®-aligned project management methodology supporting successful Medicaid system implementations and CMS certification
- Dedicated project leadership focused on transparency, accountability, communication, and stakeholder
- No learning curve

## Project Manager

Partnership

Conduent assigns a dedicated Project Manager, [redacted], to represent and oversee the day-to-day activities of the Medicaid Drug Rebate (MDR) System implementation. [redacted] serves as DHHS's single point of contact for matters relating to the project and as a liaison for project stakeholders throughout the project lifecycle. She provides transparent communication, timely decision-making, and successful delivery of all project objectives.

## Project Management Methodology

[redacted] leads all Design, Development, and Implementation (DDI) activities and serves as DHHS's primary project contact. She applies PMBOK®-aligned practices, Hybrid Agile methodologies, CMS certification guidance, and Conduent's Quality Management System (QMS) to manage a project. This includes planning, execution, governance, risk, issues, and stakeholder engagement. Through weekly status meetings, dashboards, RAID management, and communication, DHHS receives timely project information and decision support.

Conduent supports DHHS's use of Microsoft Project and other State-approved tools for project administration, scheduling, resource management, and milestone tracking. [redacted] maintains the Integrated Master Schedule (IMS), Work Breakdown Structure (WBS), critical path activities, resource assignments, dependencies, milestones, and project logs. Responsibilities also

include scope management, change control, deliverable oversight, vendor coordination, readiness planning, testing, data conversion, training, deployment, stabilization, CMS certification support, and project reporting. This methodology aligns project objectives, business priorities, CMS requirements, and implementation milestones throughout the project lifecycle.

## Project Manager Qualifications

[redacted] is an accomplished Senior Project Manager with more than 18 years of experience leading complex infrastructure, software development, and enterprise technology projects. She has successfully managed projects throughout the full System Development Life Cycle (SDLC), including project initiation, planning, design, development, testing, implementation, deployment, and project closeout. Recognized as a trusted leader and effective communicator, she excels at coordinating cross-functional teams, and delivering projects on time and within budget.

**Project Management Experience.** [redacted] exceeds the minimum qualification requirement with more than 18 years of project management experience leading projects of significant scope and complexity. Throughout her career, she has managed multiple concurrent technology initiatives with budgets ranging from $200,000 to $3 million. Her responsibilities have included project planning, budgeting, resource management, schedule management, risk mitigation, status reporting, and stakeholder engagement for successful project execution and delivery.

**System Development Life Cycle (SDLC) Experience.** For more than 15 years, she has managed projects through all phases of the SDLC. Her experience includes facilitating project kickoffs, defining project scope and objectives, developing detailed work plans, and coordinating development and testing activities. She has managed implementation efforts, conducted project reviews, and led post-project evaluations. She has consistently applied structured project management methodologies and governance processes for positive quality outcomes and successful project delivery.

**Project Implementation Leadership.** [redacted] has extensive experience managing enterprise technology and infrastructure. This includes implementations involving environment buildouts, technology refreshes and virtual machine deployments. She brings networking, security, firewalls, storage systems, backup and recovery solutions, data center operations, and system decommissioning activities with her to DHHS. She has led cross-functional project teams of up to 30 resources, coordinating internal staff and third-party vendors so projects complete on time, within scope, and within budget.

**Project Planning, Risk Management, and Reporting.** Experience [redacted] brings includes developing project plans, defining objectives, tracking performance, managing risks and issues, and communicating status to executive sponsors and stakeholders. Past responsibilities have included budget management, expenditure forecasting, project metrics monitoring, and business outcome reporting. As a leader, she provides stakeholders with visibility into project performance, risks, progress, and results. Additional experience includes managing project documentation, implementation plans, disaster recovery plans, production support plans, and project controls.

**Stakeholder, Vendor, and Change Management.** [redacted] has a proven record of effectively coordinating business, technical, and vendor teams to support successful project delivery. She regularly communicates project status, risks, issues, and recommendations to executive sponsors, business stakeholders, and project teams. Her experience managing external vendors and partner organizations has enabled her to successfully align resources, priorities, and deliverables across multiple organizations. She has led organizational and technology change initiatives by fostering collaboration, facilitating communication, and supporting adoption of new processes and solutions.

**Leadership and Team Coordination.** [redacted] brings more than 18 years of project management experience leading complex technology implementations, SDLC activities, cross-functional teams, and vendor partners. Experience includes directing teams of up to 30 resources, mentoring project managers, and coordinating onsite and remote teams. Strong leadership promotes stakeholder engagement, accountability, project discipline, and successful outcomes. [redacted] offers the expertise and implementation experience required for projects of comparable size, scope, and complexity.




**Dedication and Trust for DHHS.** By partnering with Conduent, DHHS gains a dedicated Project Manager focused on measurable results, risk reduction, and alignment with business objectives. We combine industry expertise, proven delivery methods, stakeholder engagement, and disciplined project governance. This approach provides the leadership, accountability, and execution needed to deliver a successful, CMS-ready MDR solution aligned with Nebraska's priorities.

### Academic Background

Bachelor of Science, Computer Science, DeVry University, 1993 – 1997

### Professional References

| [redacted] | [redacted] | [redacted] |
|---|---|---|
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |
| [redacted] | [redacted] | [redacted] |

# VI.A.1.j Subcontractors [RFP VI.A.1.j]

**REQUIREMENT: RFP Section VI.A.1.j**
If the bidder intends to subcontract any part of its performance hereunder, the bidder should provide:
i. name, address, and telephone number of the subcontractor(s),
ii. specific tasks for each subcontractor(s),
iii. percentage of performance hours intended for each subcontract; and
iv. total percentage of subcontractor(s) performance hours.

Our solution is a stand-alone, comprehensive tool. We require no subcontractors to meet the requirements of this RFP.



Submitted by: **Conduent State Healthcare, LLC**

CONDUENT

**Response to Request for Proposal**

# Medicaid Drug Rebate System (MDR)

## for the State of Nebraska, Department of Health and Human Services (DHHS)

Due Date: **August 6, 2026** | RFP Number: **124528 ON**

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# VI.A.2 Technical Response [RFP VI.A.2]

**REQUIREMENT: RFP Section VI.A.2**

The Technical Response section of the solicitation response shall consist of Part I and Part II and each of the subsections. The requested information should correspond with Section (V) of the RFP and any related attachments.

## VI.A.2.I Technical Response – Part I [RFP VI.A.2]

**REQUIREMENT: RFP Section VI.A.2**

## VI.A.2.I.a Understanding of the Project [RFP VI.A.2.Part 1. a]

**REQUIREMENT: RFP Section VI.A.2.Part 1. a**

a. Understanding of the project requirements.

(Important Note - Include all information except Attachment A & B– Functional and Technical Requirements to Section V. under Part I of the Technical Response; these attachments are to be placed in Part II of the Technical Response.)

***States need a partner who helps them comply with all policies and regulations. That partner must also accurately determine and efficiently process PBM rebates to maximize value for the state and its constituents.***

As a true Medicaid ally, our Medicaid rebate solution is directly tied to our contracts and to meeting the needs of our state partners. Our spirit of innovation drives continuous improvement and helps us respond to the evolving needs of the states we serve. We believe we are the strongest available partner to deliver MDR Services Scope of Work For Nebraska's DHHS.

### Understanding of the Project Requirements

Nebraska DHHS seeks a modern Medicaid Drug Rebate (MDR) solution that replaces its aging legacy system with a secure, scalable, and CMS-certifiable platform. The State's objectives include improving operational efficiency, automating rebate administration, strengthening financial accountability, and providing a more effective experience for both DHHS staff and drug manufacturers. Conduent has delivered multiple CMS-certified systems, de-risking Nebraska's federal funding and compliance milestones.

**Maximizing Rebates Translates to Savings**

- As an industry leader with a robust MDR Services solution, our system empowers us to collect 99% of all rebates invoiced.
- As an industry leader, our rebate team's operational expertise maximizes rebates by talking to clients daily and providing the right information to the right person at the right time.
- We never keep any of the money we collect. We turn over 100% to you.

This project encompasses the entire Medicaid Drug Rebate lifecycle; therefore, the solution must support rebate-eligible claims identification, invoicing, payment processing, dispute management, financial reconciliation, manufacturer communications, reporting, audit support, and federal compliance activities. The new platform must also provide comprehensive operational visibility while reducing reliance on manual processes.

Conduent brings extensive Medicaid rebate experience to this engagement. We have supported Medicaid drug rebate programs for **more than 27 years** and currently collect approximately [redacted].

Data accuracy drives successful rebate administration. Nebraska requires a solution that accurately identifies rebate-eligible claims, applies CMS rebate data, supports unit conversions, validates invoices, manages disputes, and maintains a complete audit trail. Conduent's CMdS Rebate Administration solution automates these functions and includes built-in auditing capabilities that improve invoice quality and reduce manufacturer disputes.

Stakeholder collaboration throughout is critical to the overall health and success of the project. DHHS requires active engagement with business, pharmacy, financial, operational, and technical stakeholders during requirements validation, design reviews, testing, training, and implementation readiness activities. Continuous collaboration promotes transparency, accelerates decision-making, and aligns solution delivery with program objectives.

Nebraska's legacy system contains years of operational, financial, and rebate history that support ongoing business functions and compliance obligations. We recognize that data conversion represents a critical success factor. The implementation approach must include data profiling, mapping, validation, reconciliation, conversion testing, and migration activities that preserve data integrity while supporting a controlled and low-risk transition to the new platform.

CMS certification remains a core project objective that we consistently excel in. Our CMdS Rebate Administration solution complies with Streamlined Modular Certification principles, supports complete requirements traceability, and produces the documentation and evidence necessary for certification review. Certification activities are integrated throughout design, development, testing, implementation, and operational readiness efforts. **We have a perfect record; since we began supporting states with their drug rebate program needs, we have never failed to meet a CMS-required deadline.**

We also recognize the importance of operational readiness. Nebraska requires comprehensive testing, user training, knowledge transfer, business continuity planning, disaster recovery validation, and post-implementation support. These activities prepare DHHS personnel to administer the program effectively and maintain continuity of operations following Go-Live.

Conduent brings an innovative and efficient rebate system. Our CMdS provides a robust, configurable, and easy-to-use CMdS Rebate Administration solution. Our experience supporting multiple Medicaid programs and time-tested technology provides DHHS with a complete solution. Figure VI.A.2.I.a-1 details the features and benefits of our solution.

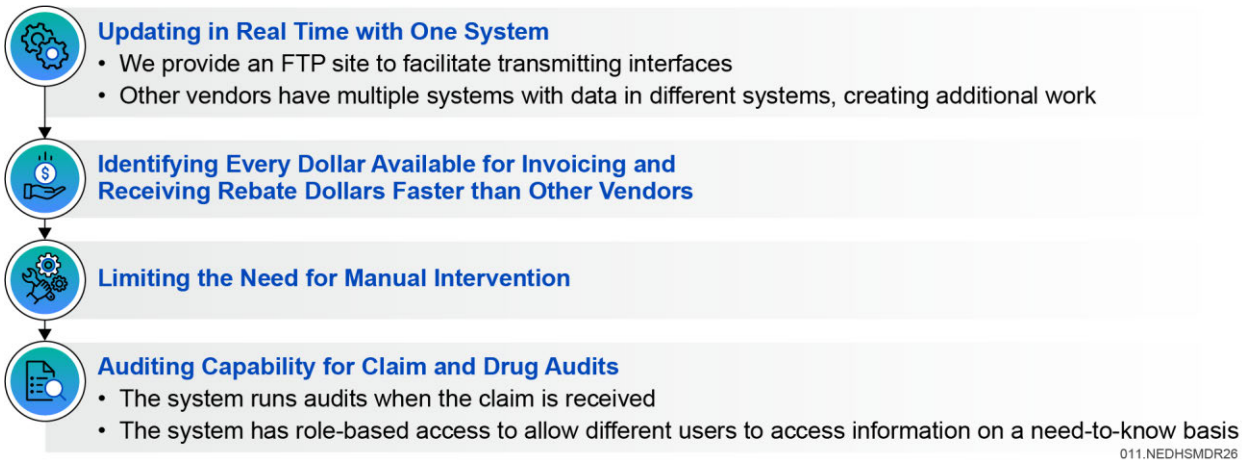



**Figure VI.A.2.I.a-1. CMdS Features and Benefits**
*Conduent's CMdS Rebate Administration solution was designed specifically for Medicaid Drug Rebate Programs.*

The platform supports federal, supplemental, and state-specific rebate processes through a configurable, user-friendly environment. It provides automated invoicing, payment tracking, dispute management, reporting, audit capabilities, and role-based access controls that strengthen program oversight and efficiency.

In summary, we understand that Nebraska seeks a trusted partner capable of delivering a modern, fully integrated, CMS-certifiable Medicaid Drug Rebate solution. **Conduent's CMdS Drug Rebate Module follows Nebraska's rebate workflow with a modern UI and configurable canned/ad hoc reporting, enabling low-risk modernization of the 1991 system with minimal disruption.** Our solution combines extensive Medicaid drug rebate experience, proven Medicaid program expertise, mature technology, and a successful certification track record. Together, these strengths help DHHS modernize operations, maximize rebate recoveries, strengthen compliance, and support long-term program success.

### VI.A.2.I.a.1 Project Requirements [RFP V.D]

**REQUIREMENT: RFP Section V.D**

#### *VI.A.2.I.a.1.a Team Coordination [RFP V.D.1]*

**REQUIREMENT: RFP Section V.D.1**

1. Team Coordination

a. Leadership Kick-off Meeting (Virtual) Plan and conduct an executive kick-off meeting that includes vendor project leadership and all staff in key roles assigned to project, DHHS staff, and additional technical advisors as needed. Meeting should focus on introductions of staff, roles, and/or any teamwork groups assigned to project deliverables. Incorporate high level overview of the project scope, implementation, timelines and deliverables.

Action item for Project Kick-off Meeting is discussion on development of Formal Project Presentation. Format can be PowerPoint or written and shall be provided to DHHS staff for review and approval five (5) business days prior to the Project Kick-off meeting. Presentation must incorporate an understanding of the project, overview of the approach, methods, and timelines for entire project.

Vendor will provide detailed summary of executive meeting minutes to DHHS within two (2) business days.

b. Project Kick-off Meeting (On-Site)

Coordinate and facilitate an on-site Kickoff meeting no later than two (2) weeks after contract execution. Vendor presentation should cover intricate details for project initiation, planning, design/configuration, development/testing, execution, testing, data conversion/migration and training. Post presentation discussion will cover collaboration efforts for successful project assignments, timelines and budget expectations.

***Successful delivery of Nebraska's MDR modernization begins with bringing the right people together. Early alignment gives DHHS and Conduent a shared understanding of the project, the implementation approach, and the decisions needed to move the work forward.***

Through the virtual Leadership Kick-off and on-site Project Kick-off meetings, Conduent brings together project leadership, key personnel, subject matter experts, DHHS staff, and other stakeholders. The meetings confirm roles, decision-making authorities, project workgroups, communication protocols, and immediate startup activities. They also identify early dependencies, coordination needs, and items requiring follow-up.

These meetings establish a common understanding of Nebraska's modernization objectives. These activities include replacing the State's 30-year-old rebate system and expanding labeler self-service capabilities. They also reduce manual processing, implement required interfaces, migrate historical data, and prepare the solution for operations and CMS certification

Conduent uses this early alignment to confirm the project scope, implementation approach, major deliverables, dependencies, and key milestones. It also establishes the path to DHHS's expected 12-month implementation and provides a clear starting point for detailed project planning.

## Team Coordination

Conduent maintains coordination through defined governance forums, project workgroups, weekly status meetings, and targeted planning sessions. Participants include Conduent and DHHS Key Personnel, implementation team members, subject matter experts, interface partners, and technical advisors based on the topics being addressed.

Each forum has a clear purpose, expected participants, and documented outcomes. The Project Manager records decisions, action items, owners, and due dates and tracks them through completion. These forums give DHHS and Conduent regular opportunities to review progress, coordinate resources, address risks and dependencies, prepare for upcoming deliverables, and elevate items requiring timely direction.

### *Leadership Kick-off Meeting (Virtual)*

Conduent plans and conducts a virtual Leadership Kick-off Meeting that includes Conduent project leadership and key staff, DHHS leadership and staff, and additional stakeholders identified by DHHS or Conduent. The meeting introduces the individuals responsible for the project and establishes a shared understanding of how the teams will work together.

The Leadership Kick-off Meeting includes:

- Introductions of Conduent and DHHS project leadership, implementation team members, subject matter experts, and technical advisors
- Review of the project governance model and decision-making authorities
- Confirmation of roles, responsibilities, and primary points of contact
- Identification of project workgroups and collaborative teams
- High-level review of project objectives, scope, implementation strategy, and expected outcomes
- Discussion of key milestones, deliverables, dependencies, and critical success factors
- Review of communication, reporting, decision, and escalation protocols
- Identification of immediate risks, constraints, and external coordination needs
- Confirmation of actions required to prepare for the on-site Project Kick-off Meeting
- Agreement on immediate next steps, action owners, and due dates

During the meeting, Conduent and DHHS also discuss the development, format, and content of the Formal Project Presentation for the on-site Project Kick-off Meeting. The finalized presentation is delivered in Microsoft PowerPoint and submitted to DHHS for review and approval no later than five business days before the on-site meeting.

The presentation demonstrates Conduent’s understanding of Nebraska’s MDR initiative and provides a high-level overview of the implementation approach, methodology, project phases, major activities, deliverables, dependencies, and schedule. It also explains how Conduent uses the CMdS Rebate solution to meet Nebraska’s program needs while coordinating interfaces, converted data, user preparation, operational readiness, and certification activities.

Figure VI.A.2.I.a.1-1 details the planned content of the Formal Project Presentation and illustrates how the presentation communicates Conduent’s understanding of the MDR initiative.




**Figure VI.A.2.I.a.1-1. Virtual Leadership Kick-off Presentation**
*Presentation content is submitted to DHHS for review and approval at least five business days before the on-site Project Kick-off Meeting.*

Within two business days after the Leadership Kick-off Meeting, the Conduent Project Manager provides DHHS with detailed meeting minutes. The minutes document participants, key discussion points, decisions, action items, assigned owners, due dates, open questions, and items requiring follow-up. The Project Manager tracks resulting actions through completion and incorporates relevant decisions into project planning and governance activities.

## *Project Kick-off Meeting (On-Site)*

No later than two weeks after contract execution, Conduent coordinates and facilitates an on-site Project Kick-off Meeting at a location designated by DHHS. The meeting establishes a common understanding of the project goals, scope, delivery approach, timeline, responsibilities, and implementation expectations among DHHS, Conduent, and participating stakeholders.

The meeting moves the project from initial coordination into detailed planning and execution. Conduent explains how activities connect across workstreams, identifies decisions and dependencies requiring early attention, and confirms the participation needed from DHHS, Conduent, interface partners, and other stakeholders. Participants also have an opportunity to ask questions, raise concerns, and confirm how project progress, decisions, and action items will be communicated and tracked.

The Formal Project Presentation provides detailed coverage of:

- Project initiation and planning activities
- Governance, decision-making, and stakeholder coordination
- Business process review and requirements validation
- System design and configuration
- Data conversion and historical data migration
- Interface and integration planning
- Development, configuration, and testing
- User acceptance testing preparation and support
- Training, documentation, and knowledge transfer
- CMS certification support
- Operational readiness and Go/No-Go preparation
- Implementation execution and production cutover
- Go-live support, warranty activities, and transition to operations
- Major milestones, deliverables, dependencies, and decision points

Following the presentation, Conduent facilitates discussion of the collaboration needed to complete project assignments. Discussions address stakeholder responsibilities, timeline commitments, resource coordination, external dependencies, and actions needed to maintain progress.

At the conclusion of the meeting, Conduent and DHHS confirm immediate priorities, upcoming workshops and workgroups, assigned action owners, due dates, and the schedule for completing project startup activities.

### *VI.A.2.I.a.1.b Project Initiation and Planning [RFP V.D.2]*

**REQUIREMENT: RFP Section V.D.2**

Describe and include specific information regarding your methodology to accomplish each task listed. Note:

If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, Vendor must integrate such tasks into their solution to be performed accordingly. DHHS preference is the use of Microsoft Project or other state-approved software. Must include acceptance of Microsoft Project and/or recommended software for implementation.

Develop and create all plans as outlined herein subsections a through j. and submit for DHHS review and acceptance no later than three (3) weeks after the Kickoff. If DHHS does not accept the plan(s) in part or in its entirety, the vendor shall make proposed modifications and/or suggested changes accordingly. Such proposed modifications and/or suggested changes shall be at no additional cost to DHHS. Each developed plan must be maintained throughout the project lifecycle. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b)(vi)).

a. Develop a Detailed Project Plan (Work Breakdown Structure (WBS) Provide detailed and comprehensive Master Project Plan WBS for review and approval no later than three (3) weeks after the Kickoff. Must include Integrated Master Project Schedule based on the Master Project Plan. The Integrated Master Project Schedule shall identify:

i. All of the activities and tasks required to implement the MDR Project (to the extent Vendor can identify all such tasks and activities).

ii. The work breakdown structure.

iii. Team identification for each task/activity, role assignments by title.

iv. All dependencies, sub-tasks, successors & predecessors.

v. Timeline must detail start and end dates for task/activity completion.

vi. Estimated hours for each task & sub-task (including key tasks and dependencies)

vii. Discuss any tasks in “critical path” of project that may cause delays based on expertise and estimated impact to the overall project schedule.

b. Develop a Project Management Plan Provide detailed and comprehensive Project Management Plan for review and approval no later than three (3) weeks after the Kickoff. Executive Summary The Project Management Plan shall at minimum include the following components:

i. Executive Summary

ii. Risk/Issue Management

iii. Deliverable Management

iv. Communication Management

v. Staffing Management

vi. Change Management

vii. Quality Management

viii. Scope Management

ix. Schedule Management

x. Performance Management

c. Develop a Risk & Issue Management Plan

Provide detailed and comprehensive Risk & Issue Management Plan for review and approval no later than three (3) weeks after the Kickoff. The plan should identify, evaluate, and plan for possible risks that may arise within the project so that risk-handling activities are prepared in advance mitigating adverse impacts on achieving objectives. The plan will also outline the process of identifying, tracking, and resolving issues that arise throughout the project lifecycle.

The key aspects of the plan should include the following:

i. Risk Identification and Mitigation Process.

ii. Issue Management Process.

iii. Describe the process of prioritizing, tracking, escalating, communicating, and reporting risks and issues.

iv. Provide the approach to documenting, reporting, and resolving risks and issues identified by the vendor, the DHHS, or other stakeholders.

v. Roles and Responsibilities.

vi. Define roles and responsibilities for those responsible for risk and issue management.

vii. Impact Matrix.

viii. Define the impact matrices that will be used to analyze, evaluate, and prioritize risks and issues.

d. Deliverable Review and Approval Process (DRAP):

Develop a detailed and comprehensive Deliverable Review and Approval Process. The Deliverables Review Process defines how deliverables are: submitted for review; reviewed; commented on; how requests for changes are managed; the schedule for review; the schedule for updates; and deliverable acceptance. The State reserves the right to make the final decisions on the DRAP.

Deliverable Expectation Document (DED):

i. Provide DED for each written Deliverable. The DED must be submitted for State's review and approval no later than 30 calendar days before the written Deliverable is due for submission to the State.

ii. Deliverables submitted without DED review and acceptance will not be compensated.

Revision of deliverables, if required, must use DHHS review findings to meet content and format requirements. DHHS written acceptance and approval is required for all final deliverables and release of payment. A project phase is not considered complete until DHHS has approved all phase-specific deliverables.

Deficiencies relating to deliverables will initiate discussion and possible investigation to determine source of deficiency. Penalties associated with deficiencies are referenced in Attachment D – MDR Performance Guarantees.

e. Develop a Communication Plan

Provide a detailed and comprehensive Communication Plan for review and approval no later than three (3) weeks after the Kickoff meeting. The communication plan will outline how important information will be communicated to stakeholders throughout the project. Develop stakeholder register and communication list in collaboration with DHHS outlining key personnel, software for communication and routine schedule.

The key aspects of the plan should include the following:

i. Target Audiences

a. Identify the specific groups of people who need to be informed about the project, such as team members, clients, sponsors, and external stakeholders.

ii. Communication Objectives

a. Specify the objectives to be achieved for each communication.

iii. Communication Channels

a. Identify the most appropriate communication channels for each target audience.

iv. Communication Schedule

a. Determine the frequency and timing of communication for each target audience.

v. Communication Responsibilities

a. Define who is responsible for communicating with each target audience.

vi. Feedback Mechanisms

a. Set up channels for receiving feedback from stakeholders.

f. Develop a Staffing Plan

Provide a detailed and comprehensive Staffing Plan for review and approval no later than three (3) weeks after the Kickoff. The staffing plan will outline the human resource needs of the project and how those needs will be met. Propose a staffing approach that

aligns with DHHS business requirements associated with this RFP.

The key aspects of the plan should include the following:

i. Staffing Process - Describe how staffing levels will achieve service regardless of changes that may influence work volume. Include the process of temporarily and permanently replacing vacancies in key/non-key personnel.

ii. Roles and Responsibilities - Define the roles and responsibilities by resource type, including identifying key and non-key personnel as well as resource allocation for all personnel. Provide details that differentiate by vendor staff, and subcontractor staff, if applicable.

iii. Resource Calendars - Identify total hours to be expended, per phase, and for the entire project, by vendor staff and subcontractor staff, if applicable.

iv. Background Checks – maintain auditable records for all completed background checks for all individuals assigned to project. This action must occur for any new staff that are assigned throughout the duration of the contract.

v. Performance Issues - DHHS reserves the right to request removal of staff. The vendor must provide an acceptable replacement within ten (10) business days of the notice of this release.

vi. Staffing Plan Changes - If there are any changes in key personnel, the vendor is expected to notify DHHS in writing at least fourteen (14) days prior to the change, except in the case of immediate risk to the health and safety of project staff, or in the case of unlawful security breaches. The vendor's key personnel positions may not be vacant for more than ten (10) business days without a qualified substitute (temporary replacement). A qualified substitute must be in place no more than ten (10) State business days after the separation date of the vacating resource. The vendor may not fill vacant key personnel positions with other existing key personnel without approval by DHHS. DHHS will also have the authority to approve proposed replacements of key personnel by the vendor.

Vendor should provide competent and experienced staff to meet all key personnel positions for both MDR implementation and operations, and ensure full compliance with project requirements as the solution is implemented and deployed.

g. Key Personnel

Key Personnel during Implementation:

i. Account Manager

ii. Project Manager

Key Personnel during Operations, including but not limited to:

iii. Account Manager

Account Manager must be the single point of contact for matters concerning performance under the Contract. Account Manager must have the authority to make decisions that are binding to the Contract, held responsible for timely completion of the deliverables for the project, and shall be responsible for meeting all contractual obligations. Include the approach to account management and describe how the account manager will meet this requirement.

Account Manager minimum qualifications:

i. A minimum of five (5) years' contract management experience managing related services with similar budgets, preferably in Medicaid or the healthcare industry and for a project similar in size and scope to this project.

ii. Minimum five (5) years' experience managing activities related to contract administration, correspondence with project clients, dispute resolution, personnel issues, and project reporting.

iii. Minimum five (5) years' experience leading and coordinating project implementation activities, to include evaluation, training, reporting, and recommendations.

iv. Minimum five (5) years' experience conducting project analysis and consultation of marketplace and impact changes.

v. Minimum five (5) years' experience providing project consultation and coordinating changes for major initiatives.

Project Manager must represent and oversee the day-to-day activities of the project. Serve as DHHS's primary point of contact for matters relating to the project and serve as a liaison for project stakeholders.

DHHS preference is the use of Microsoft Project or other state-approved software. Project Manager must include acceptance of Microsoft Project and/or recommended software for managing daily activities.

Project Manager minimum qualifications:

i. A minimum of five (5) years' project management experience managing projects of similar size and scope, preferably in Medicaid or the healthcare industry, within the last three (3) years from the release date of the RFP.

ii. Minimum five (5) years' experience managing Systems Development Life Cycle (SDLC) for projects of similar size and scope of this RFP.

iii. Minimum five (5) years' experience initiating and managing an MDR system implementation, or comparable experience with capabilities of overseeing all contracted activities in a project of similar size and scope of this RFP.

iv. Project Management Professional (PMP) certification through the Project Management Institute (PMI) is preferred.

h. Develop a Change Management Plan

Provide a detailed and comprehensive Change Management Plan for review and approval no later than three (3) weeks after the Kickoff. The change management plan will outline the process for change management throughout the project lifecycle, including how to submit a change request and how those requests are assessed.

The key aspects of the plan should include the following:

i. Change Management Process detailing the process of submitting, evaluating, authorizing, managing, and controlling change requests.

ii. Roles and Responsibilities - define individual titles and responsibilities within the project.

iii. Change Request Form Template for submitting changes.

iv. Change Log Template to track all submitted changes and outcomes.

i. Application Configuration and Maintenance Plan

Provide a detailed and comprehensive Application Configuration and Maintenance Plan for review and approval prior to the beginning of configuration activities.

The key aspects of the plan shall include the following:

i. Approach to conducting design sessions or walkthroughs.

ii. Approach to conducting sprints or iterations.

iii. Configuration management.

iv. Release cycle and frequency.

v. Tasks, timelines, and responsible parties for design and configure/build tasks.

vi. Approach to system enhancements.vii. Programming and coding standards.

***Conduent and DHHS use the Project Initiation and Planning phase to confirm the work, assign responsibilities, establish decision paths, and put the controls in place to guide the project forward.***

Nebraska's MDR modernization requires more than replacing an aging application. DHHS must coordinate business processes, claims data, interfaces, financial activities, program staff, technical teams, external partners, and CMS certification requirements within an expected 12-month implementation. Early project decisions will affect requirements validation, configuration, data migration, testing, training, operational readiness, and the timing of go-live.

Conduent uses the Project Initiation and Planning phase to translate the RFP, approved contract, and DHHS priorities into an executable implementation baseline. Working with DHHS, we confirm the project scope, objectives, deliverables, responsibilities, dependencies, assumptions, constraints, decision-making authorities, and acceptance processes. We also identify early actions that could affect the schedule, including access to source data, interface partner participation, environment availability, stakeholder availability, and CMS certification activities.

The phase results in an approved Master Project Plan, Integrated Master Project Schedule, Project Management Plan, and supporting plans and processes. Together, these artifacts give DHHS a clear view of what work will be performed, who is responsible, when activities will occur, how deliverables will be reviewed, and how the project will manage risks, issues, changes, quality, staffing, and performance.

Within three weeks of the project kickoff, Conduent submits required project plans and processes to DHHS for review and acceptance. When DHHS requests changes, we revise and resubmit the affected plan at no additional cost. Approved plans remain under version control and are maintained throughout the project lifecycle. Subsequent changes follow the approved Change Management Plan.

## Detailed Project Plan and Work Breakdown Structure

The Master Project Plan and Integrated Master Project Schedule convert the implementation activities into a resource-loaded, time-phased work plan. Conduent develops these artifacts through collaborative planning sessions with DHHS project leadership, technical teams, interface partners, and other stakeholders responsible for project activities. Conduent uses Microsoft Project to develop and maintain the implementation schedule, assign resources, establish task relationships, identify the critical path, track progress, and report schedule performance.

The work plan includes all activities and tasks required to implement the MDR solution. It also incorporates any additional tasks or functions needed to meet the requirements and deliver a fully functional solution. We organize the work into phases, activities, tasks, subtasks, deliverables, review periods, milestones, and approval points.

The schedule includes the work required for:

- Project initiation and governance
- Requirements validation and demonstrations
- Solution design and configuration
- Interface planning and implementation
- Data conversion and migration
- Environment preparation
- System, integration, regression, performance, security, and user acceptance testing
- Training and knowledge transfer
- Operational readiness and cutover
- Go-live and warranty support
- CMS certification
- Transition to operations

Each schedule activity identifies the responsible team or role, estimated effort, start and finish dates, predecessors, successors, dependencies, and related deliverables. Resource assignments identify the participation expected from Conduent, DHHS, subcontractors, interface partners, and other project participants.

Conduent reviews the schedule for critical-path activities, resource constraints, external dependencies, and milestone impacts. We identify activities that could delay implementation, estimate their effect on the overall schedule, and define actions to reduce or recover the impact. Particular attention is given to data availability, interface development, requirements decisions, test readiness, UAT completion, operational readiness, and certification artifacts.

Following DHHS approval, Conduent baselines the Master Project Plan and Integrated Master Project Schedule. The Project Manager updates progress, monitors performance against the baseline, and reports variances through project governance. Changes to approved dates, dependencies, resources, or scope follow the DHHS approved change management process.

## Project Management Plan

The Project Management Plan defines how Conduent and DHHS govern and manage the MDR implementation. Grounded in PMBOK practices and informed by Conduent’s experience implementing Medicaid pharmacy and drug rebate solutions, the plan brings the individual management processes into one operating framework. It describes how the team will plan, execute, monitor, control, and complete the project.

The plan includes:

- **Executive summary.** Project objectives, delivery approach, governance model, major phases, and expected outcomes.
- **Risk and issue management.** Identification, assessment, ownership, mitigation, escalation, resolution, and reporting.
- **Deliverable management.** Planning, development, quality review, submission, comment resolution, revision, and acceptance.
- **Communication management.** Stakeholder communications, meeting cadence, reporting, channels, responsibilities, and feedback.
- **Staffing management.** Resource needs, assignments, availability, replacement processes, and performance expectations.
- **Change management.** Submission, evaluation, authorization, tracking, implementation, and closure of changes.
- **Quality management.** Quality reviews, acceptance criteria, corrective actions, and verification that work products meet requirements.
- **Scope management.** Scope definition, traceability, validation, and control of requested changes.
- **Schedule management.** Baseline development, progress updates, dependency management, variance analysis, and recovery planning.
- **Performance management.** Measures used to evaluate schedule, deliverable, quality, risk, issue, and readiness performance.

The Project Manager uses the plan as the primary guide for day-to-day project management. Conduent reviews it with DHHS during project startup and updates it when approved changes affect project controls, responsibilities, or delivery activities.

## Risk and Issue Management Plan

The Risk and Issue Management Plan explains how Conduent and DHHS identify, document, track, and resolve risks and issues throughout the project. Conduent maintains a centralized risk and issue register that is available to project participants.

Team members may raise risks and issues during status meetings, planning sessions, deliverable reviews, testing, readiness activities, or day-to-day project work. The Project Manager or designated project coordinator records each item in the register and assigns an owner. The entry documents the affected activities, probability or priority, potential impact, planned response, target dates, current status, and evidence required for closure.

Conduent and DHHS use agreed impact criteria to evaluate effects on scope, schedule, cost, quality, security, operations, and certification. Higher-priority items receive more frequent review and are elevated through the appropriate governance forum when additional direction or action is needed.

The plan defines:

- Risk identification, analysis, mitigation, contingency planning, and closure
- Issue documentation, prioritization, assignment, resolution, and closure
- Roles of the Project Manager, Account Manager, workstream leads, DHHS owners, and governance bodies
- Escalation thresholds and decision timeframes
- Reporting and communication requirements
- Review cadence and aging analysis
- Documentation required to close a risk or issue

Risk and issue owners remain accountable for assigned actions. The Project Manager monitors due dates, reports overdue actions, and elevates items requiring DHHS direction or leadership intervention.

## Deliverable Review and Approval Process

The Deliverable Review and Approval Process defines how Conduent develops, reviews, submits, revises, and obtains acceptance of project deliverables. The process gives DHHS visibility into planned content before formal deliverable submission and establishes clear review periods, comment-resolution steps, and approval responsibilities.

For each written deliverable, Conduent prepares a Deliverable Expectation Document (DED) at least 30 calendar days before the deliverable due date. The DED identifies the deliverable's purpose, proposed content, format, acceptance criteria, development responsibilities, review participants, submission date, and review schedule. Conduent does not submit a written deliverable without DHHS review and acceptance of the applicable DED.

Before submission to DHHS, Conduent conducts internal content and quality reviews. Formal submissions follow the agreed process for:

- Deliverable submission and receipt
- DHHS review and comments
- Conduent clarification of requested changes, if applicable
- Conduent revision and resubmission
- DHHS final written acceptance
- Version control and storage

Conduent revises deliverables based on DHHS findings and documents how each comment was addressed. DHHS retains final decision-making authority over the process and final deliverable acceptance. A project phase is not complete until DHHS has approved all deliverables associated with that phase, and Conduent recognizes that deliverables submitted without an accepted DED are not eligible for compensation.

If a deliverable deficiency occurs, Conduent works with DHHS to identify the cause, correct the deliverable, and address any underlying process issue that could affect future submissions.

## Communication Plan

The Communication Plan defines what information each stakeholder group needs, when it is needed, how it will be shared, and who is responsible for providing it. Conduent develops the plan with DHHS and maintains a stakeholder register and communication list throughout the project.

The plan identifies the needs of executives, project leadership, program staff, technical teams, interface partners, users, and external stakeholders. It also defines the purpose of each communication, the appropriate channel, the frequency and timing, and the individuals responsible for preparing, presenting, reviewing, and receiving the information. Communication methods may include meetings, reports, project repositories, email, presentations, and formal notifications. The plan also describes how the project team will collect and respond to questions, comments, decisions, and stakeholder feedback.

Planned communications include executive governance meetings, weekly project status meetings, workstream sessions, risk and issue reviews, schedule reviews, deliverable reviews, testing updates, readiness assessments, and meetings focused on specific decisions. Meeting minutes document key discussions, decisions, action items, owners, and due dates.

The Project Manager reviews the Communication Plan with DHHS throughout the project and updates stakeholder information, meeting schedules, distribution lists, responsibilities, and communication methods as project needs change.

## Staffing Plan

The MDR implementation requires different skills and staffing levels as the project moves from planning and requirements validation through configuration, data migration, testing, training, go-live, and operations. The Staffing Plan describes how Conduent provides the resources needed for each phase, aligns staffing with DHHS business requirements, and maintains coverage when workload, priorities, or personnel availability change.

The plan identifies Key and non-Key Personnel, their roles and responsibilities, required experience, and planned allocation. Resource calendars show the hours assigned by role and project phase, as well as the total effort planned for implementation. When subcontractors participate, the plan distinguishes their responsibilities, hours, and reporting relationships from those of Conduent staff.

Conduent monitors staffing needs throughout the project and adjusts resources when workload or project priorities change. The plan defines how we provide temporary coverage for planned or unexpected absences, permanently replace vacant positions, and transfer knowledge between outgoing and incoming team members. It also describes how performance concerns are addressed so staffing issues do not disrupt project activities or deliverables.

Conduent completes required background checks for all personnel assigned to the project and maintains auditable records throughout the contract. The same process applies to staff added after project startup.

When DHHS requests the removal of a team member, Conduent provides an acceptable replacement within 10 business days. For planned changes to Key Personnel, we notify DHHS in writing at least 14 days in advance. A Key Personnel position will not remain vacant for more than 10 business days without a qualified temporary replacement. Conduent will not assign another existing Key Person to fill the vacancy without DHHS approval, and DHHS retains approval authority over proposed replacements.

## Key Personnel

Conduent assigns an Account Manager and Project Manager who meet or exceed the qualifications stated in the RFP. Their responsibilities are distinct but coordinated.

The Account Manager serves as the single point of contact for matters concerning contract performance. The Account Manager has authority to make decisions binding to Conduent, monitors contractual obligations, oversees timely completion of deliverables, addresses performance concerns, and elevates matters requiring executive attention. The Account Manager continues in this role during implementation and operations.

The Project Manager leads day-to-day implementation activities and serves as DHHS's primary project contact. The Project Manager coordinates the schedule, project team, deliverables, risks, issues, dependencies, meetings, reporting, and stakeholder participation. The Project Manager also acts as the liaison between program, technical, operational, and external stakeholders.

The Project Manager uses Microsoft Project to manage daily activities, maintain the Integrated Master Project Schedule, assign resources, monitor the critical path, analyze variances, and report project performance.

Resumes and qualification matrices in Section VI.A.1.i.1 and VI.A.1.i.2 document how the proposed Account Manager and Project Manager meet or exceed the experience and qualification requirements defined in RFP V.D.2.g.

## Change Management Plan

Changes may arise as DHHS validates requirements, reviews configurations, coordinates interfaces, and prepares for testing and certification. The Change Management Plan explains how Conduent and DHHS document, evaluate, approve, implement, and close those changes while maintaining control of the project baseline.

Each proposed change is captured on a Change Request Form. The request describes the business need, affected requirements or deliverables, alternatives considered, estimated effort, schedule and cost impacts, technical implications, risks, and recommended action. Conduent works with DHHS and affected stakeholders to complete the impact analysis before the request is submitted to the designated approval authority.

The plan defines:

- How change requests are submitted and initially reviewed
- How impacts to scope, schedule, cost, resources, and solution design are evaluated
- Roles and decision-making responsibilities
- Approval, rejection, deferral, or requests for additional information
- Implementation planning and communication to affected stakeholders
- Updates to approved plans, schedules, requirements, and deliverables
- Verification and formal closure

Conduent maintains a Change Log that records each request, status, decision, approval date, implementation date, and outcome. Approved baselines are updated only after the change has been authorized through the agreed process.

## Application Configuration and Maintenance Plan

The Application Configuration and Maintenance Plan explains how Conduent configures, controls, releases, and maintains the CMdS Rebate solution for Nebraska. Conduent submits the plan within three weeks after kickoff and obtains DHHS approval before configuration activities begin.

Because CMdS Rebate already provides mature Medicaid drug rebate capabilities, the implementation focuses on Nebraska-specific business rules, workflows, interfaces, data conversion, reporting, security roles, and operational needs rather than extensive custom development. Conduent works with DHHS through design sessions, walkthroughs, demonstrations, and iterative reviews to validate configuration decisions before work proceeds.

The plan describes how Conduent conducts design and configuration sessions, organizes work into sprints or iterations, and identifies, versions, controls, and promotes configuration items between environments. It also defines the release cycle and frequency, approval and deployment activities, responsible parties, timelines, dependencies, and the process for evaluating and implementing future enhancements. The plan documents applicable programming, configuration, documentation, and coding standards, along with requirements for maintaining configuration records and release documentation.

Configuration decisions remain traceable to approved requirements and DHHS direction. Conduent reviews completed configurations with DHHS, incorporates approved feedback, and promotes changes through controlled environments and release processes.

## Establishing the Project Baseline

During Project Initiation and Planning, Conduent and DHHS turn the approved scope into a working framework for implementation. The phase confirms governance, staffing, communications, deliverable expectations, project controls, and the detailed schedule. It also establishes how the team manages risks, issues, changes, configuration, and performance throughout the project.

At the close of the phase, the team has the plans, responsibilities, decision paths, and schedule needed to begin requirements validation and configuration. The project team moves forward with a shared understanding of the work, the dependencies that require attention, and the controls used to keep Nebraska's MDR implementation on track.

### *VI.A.2.I.a.1.c Requirements Validation with Demonstration [RFP V.D.3]*

**REQUIREMENT: RFP Section V.D.3**

Requirements Validation with Demonstration

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

i. Coordinate and lead meetings with the MDR project team for discussion on initial overview of the system functions, processes and performance. Detailed collaboration with program to identify and define critical processes and requirements.

ii. Identify necessary system configuration changes, if any, to meet project requirements.

iii. Identify recommendations for process changes to ensure effective use the new system.

iv. Identify key features and functions of the MDR solution prior to configuration and implementation.

v. Provide a requirements validation matrix, demonstrating an understanding of the requirements and confirmation that no development work, beyond recommendations are needed. Matrix must be reviewed and approved.

vi. Provide accountability to project requirements by mapping out the relationship between requirements and project work.

vii. Provide communication method for status on project requirements, detailing proof or record of testing, issues, and completion. Requirements traceability matrix must be maintained throughout the project lifecycle. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b)(vi)).

***Conduent helps DHHS validate solution fit, identify configuration and process recommendations, establish an approved requirements baseline, and prepare for successful implementation.***

DHHS needs early confirmation that CMdS Rebate Administration supports Nebraska's MDR Program requirements. The CMdS Rebate solution provides mature, proven MDR capabilities, and this phase confirms how each requirement is supported through existing functionality or standard configuration. During this phase, Conduent and DHHS review each RFP requirement against the solution's functions, workflows, performance, reporting capabilities, interfaces, security controls, and administrative features. This review gives DHHS a clear view of the solution's alignment with Nebraska's operational, technical, reporting, and compliance requirements.

**Why Conduent?**

- Mature Medicaid rebate solution built specifically for MDR programs
- Early stakeholder confidence through hands-on demonstrations
- Proven Medicaid and CMS certification experience

The validation process helps DHHS distinguish among requirements met by existing functionality, those requiring configuration, and those dependent on interfaces, reporting setup, or data conversion.

## Review System Functions and Critical Processes

The primary objective of this phase is to give DHHS an early, detailed view of the CMdS Rebate solution and confirm the critical processes and requirements that guide implementation.

Conduent leads collaborative review sessions and demonstrations with the MDR project team to walk through system functions, business processes, workflows, reporting capabilities, and performance. Through these discussions, DHHS sees how the solution supports current and future-state operations, while the project team identifies Nebraska-specific configuration decisions and process recommendations. The team also identifies opportunities to improve efficiency, automation, reporting, transparency, and workflow effectiveness.

By reviewing critical processes and requirements early, Nebraska can establish a clear implementation direction and prioritize the configuration and process changes needed to support successful deployment and long-term program operations.

## Create an Approved Requirements Baseline

DHHS requires a documented and approved baseline that connects business requirements to solution functionality, configuration decisions, project activities, testing, and implementation outcomes. We develop and maintain a Requirements Validation Matrix (RVM) to document validation results, identify any system configuration changes needed to meet each requirement, and establish agreement on how each requirement will be addressed. The RVM distinguishes requirements supported by existing functionality from those requiring configuration or other approved recommendations and confirms that no additional development is needed. DHHS reviews and approves the RVM, creating the formal requirements baseline for the project.

After approval, the team maps each validated requirement to related project activities in the Requirements Traceability Matrix (RTM). This process provides accountability and visibility into how requirements are met through configuration, testing, deliverables, and completion throughout implementation.

## Maintain Requirements Traceability and Project Visibility

The RTM serves as the primary record for tracking each approved requirement throughout implementation. It links requirements to related project activities, configuration decisions, testing evidence, issues, deliverables, and completion status. Conduent shares this information with DHHS through status reports, tools access, and regular project reviews, giving the Department a current view of progress, open items, and supporting evidence.

Conduent keeps the RTM current throughout the project lifecycle. When an approved requirement changes, the team follows the project's Change Management Plan and updates the related requirements, project activities, and traceability records. This gives DHHS ongoing visibility into system configuration progress, issue resolution, testing, and overall implementation readiness.

## Prepare for Design and Configuration

Requirements Validation gives DHHS and Conduent an agreed direction for the next phase of implementation. By confirming solution fit and resolving questions about configuration, process changes, interfaces, data conversion, and project priorities early, the team can begin Design and Configuration with fewer open items and a clear understanding of the work ahead.

By the conclusion of this phase, DHHS has:

- Validated the CMdS Rebate features and functions needed to support Nebraska's MDR Program
- Confirmed solution fit with approved business requirements
- Identified required configuration decisions
- Documented process improvement recommendations
- Approved the Requirements Validation Matrix, including confirmation that no development is needed beyond agreed recommendations
- Established the initial Requirements Traceability Matrix
- Defined implementation priorities for design, interfaces, data conversion, testing, and deployment activities

These outcomes allow DHHS to move into Design and Configuration with an approved requirements baseline, a shared understanding of the solution changes and process recommendations, and clear priorities for the work ahead.

Proposal Section VI.A.2.II.d.2, Requirements Validation and Demonstration Narrative, describes Conduent's detailed approach to leading workshops and demonstrations, assessing solution fit, documenting agreed configuration and process recommendations, and developing and maintaining the RVM and RTM. This approach gives DHHS an approved, traceable requirements baseline and a clear starting point for Design and Configuration.

### *VI.A.2.I.a.1.d Design and Configuration [RFP V.D.4]*

**REQUIREMENT: RFP Section V.D.4**

Describe and include specific information regarding your approach and methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly. As part of your response to items a. through f. incorporate the items below.

- System design.
- System design alignment with requirements.
- System configuration.
- Data management capabilities; and
- Workflow in integrated solution, if available.

a. Establish and Utilize a Deliverable Review and Acceptance Process Agreed Upon by DHHS The key aspects of the process must include the following:

i. Review cycles, which will be conducted and scaled to size and complexity of the deliverables.

ii. Deliverables - Reflect coordination with the overall modular system and follow approved change control processes.

iii. Facilitating the change control process, outlining appropriate audience to determine priorities using a structured business value assessment process to measure both the effort to implement (in hours), and the benefits.

iv. Informal reviews and walkthroughs of draft and final deliverables are required. Note: Stagger deadlines for deliverables based on mutually agreed review periods within the overall schedule.

b. Configure Environments for Development, Testing, Training, and Production Establish multiple environments, ensuring that non-production environments do not have access to live data. Establish strategies for managing data across environments and employ automated deployment and configuration management tools to maintain consistent configurations across environments.

c. Complete Standard System Configuration Implement the user interface design and enable all the designed functionality necessary to ensure that the system is configured and functioning properly. Conduct all necessary functions to achieve completion of standard configuration and administer testing to certify that all components perform as intended.

d. Assist the State with Configuration of System Provide documentation, training, support, and expertise to ensure that the system is configured and functions properly. The completed system configuration must be tested by the vendor and perform as intended. Responsibilities will include the following:

i. Identify and provide details of all system configuration that must be completed by DHHS staff, prior to configuration training.

ii. Provide detailed system configuration instructions to DHHS for use when configuring the system.

iii. Provide training on how to complete all necessary configuration(s) identified as responsibility of DHHS staff.

iv. Assist DHHS staff with configuration tasks when deemed necessary. May include, but is not limited to assistance with software installation, network configuration, and troubleshooting errors/issues.

v. Following configuration, complete a quality review to ensure accurate and complete setup.

vi. Provide feedback to DHHS, within five (5) business days following quality review, if there are any necessary changes to be made.

e. Assist DHHS with User Role Determination Ensure all users have appropriate level of access to perform tasks, ensuring safeguards to sensitive data and system functionality. Manage user role determination and configuration, review and confirm functionality performs as intended. Responsibilities will include the following:

i. Assist in defining the different user roles within the system. Each role should have a distinct set of permissions and access levels tailored to the specific responsibilities and requirements of that role.

ii. Assist in assessing the needs and requirements of each user; considering their job duties, responsibilities, and the information they need to access to perform their tasks.

iii. Assist in the determination of users to the appropriate roles based on their needs and requirements. Ensure that each user has the necessary permissions to perform their job duties without granting them excessive access that could compromise security.

iv. Provide user role and access guide which will provide information on how to configure and manage user roles and permissions in the system. The user roles must be changeable and/or configurable, without requiring any code changes.

f. Obtain Acceptance from the State on Design and System Configuration Manage engagement and collaboration with DHHS throughout the design and configuration process, addressing any concerns or questions raised by DHHS, and secure formal approvals prior to project's next phase. This includes providing configuration and role documentation, addressing concerns, demonstrating responsiveness to those concerns, obtaining formal sign-off, and documenting the next steps.

***Conduent transforms approved requirements into a configured MDR solution that supports implementation, testing, and long-term operations.***

The Design and Configuration phase converts validated requirements into documented design decisions, configured environments, workflows, interfaces, data management processes, security roles, and product settings. Because CMdS Rebate Administration is a mature Medicaid rebate solution, the phase focuses on Nebraska-specific configuration and integration decisions rather than extensive custom development. DHHS remains involved throughout the phase through walkthroughs, deliverable reviews, configuration support, demonstrations, and formal approval.

**Understanding Nebraska's Objectives**

- Maintain alignment between approved requirements, design decisions, and system configuration
- Configure proven solution capabilities rather than relying on extensive custom development
- Establish secure, consistent environments for development, testing, training, and production
- Provide iterative demonstrations and reviews throughout implementation

## Establish Deliverable Review, Acceptance, and Change Control

DHHS needs a clear process for reviewing and approving design and configuration deliverables. Review periods match the size and complexity of each deliverable, with informal walkthroughs of draft and final materials before formal submission and approval. Deliverable dates are staggered within the project schedule so DHHS has the agreed-upon time needed for review and feedback without having to manage too many deliverables at once.

When a proposed change arises, Conduent and DHHS bring the right decision-makers together to consider its business value, estimated effort in hours, expected benefits, operational impact, and project priorities. Approved changes follow established governance procedures, remain coordinated with the broader modular system, and stay aligned with the overall implementation.

This gives DHHS clear visibility into design decisions, adequate time to review deliverables, and control over changes that could affect the solution or project schedule.

## Configure Secure and Consistent Environments

DHHS requires separate Development, Testing, Training, and Production environments to support implementation activities while protecting production operations and sensitive information. Non-production environments do not have access to live production data. When testing requires production-derived data, Conduent masks or de-identifies sensitive information before introducing the data into a non-production environment.

Development and System Integration Testing environments provide the configurations, interfaces, and test data needed to develop and validate the solution. User Acceptance Testing closely mirrors Production so DHHS can evaluate workflows, security roles, interfaces, and reports under production-like conditions. The Training environment reflects the approved configuration and uses controlled training data.

Conduent uses automated deployment and configuration management tools to maintain consistency across environments. As configurations are completed and approved, they move through a controlled promotion path from Development to System Integration Testing, User Acceptance Testing, and Production.

## Complete and Validate Standard System Configuration

Design and configuration activities focus on the Nebraska-specific decisions needed to configure, integrate, test, and operate CMdS Rebate Administration successfully. Because the solution is a mature Medicaid rebate platform, the work centers on adapting proven capabilities to Nebraska’s requirements rather than extensive system redesign.

Key areas include:

- Workflow and business process configuration
- Interface and data exchange design
- Data migration, conversion, and management
- Security roles and access controls
- Reporting, extracts, and correspondence

Throughout the phase, Conduent maintains traceability between approved requirements and design and configuration decisions. This gives DHHS visibility into how the configured solution supports Nebraska’s business and technical needs.

Using the approved design, Conduent configures the user interface, workflows, business rules, reports, interfaces, security controls, and administrative functions needed for the MDR solution. We then test the completed configuration to confirm that each component functions as intended and is ready for DHHS review and subsequent testing.

## Prepare DHHS for Configuration Responsibilities

DHHS may perform designated configuration activities. The State needs a clear understanding of those responsibilities before configuration training begins. Conduent works with the State to identify each configuration task assigned to DHHS and provides the detailed instructions, documentation, and training staff need to complete the work correctly.

Conduent also provides hands-on guidance and technical support during configuration, including assistance with installation, network settings, and troubleshooting when needed. After DHHS completes its assigned activities, Conduent reviews the configuration for accuracy and completeness and provides feedback within five business days when changes are needed.

This prepares Nebraska staff to complete their configuration responsibilities while building the administrative knowledge needed to manage the solution over time.

## Define and Configure User Roles

DHHS requires a role-based security model that aligns system permissions with job responsibilities while protecting sensitive program, financial, and operational information. Conduent works with DHHS to define distinct user roles, understand the access each role needs, and assign permissions that allow staff to perform their responsibilities without providing unnecessary access.

After roles are configured, Conduent reviews and tests them to confirm that permissions and system functions operate as intended. We also provide a user role and access guide that explains how DHHS can configure and manage roles and permissions. These settings remain configurable without code changes, allowing DHHS to respond to future organizational and operational needs.

## Obtain Formal DHHS Acceptance

DHHS requires formal approval of Design and Configuration activities before the project progresses to testing. Approval confirms that the project team:

- Configured Nebraska-specific functionality in alignment with approved requirements
- Defined and documented interfaces, data migration and conversion activities, workflows, security roles, and other configuration decisions
- Demonstrated how standard CMdS Rebate capabilities satisfy applicable requirements
- Reviewed and addressed stakeholder feedback and documented agreed next steps

Because CMdS Rebate is a mature product, Conduent does not recreate design documentation for base functionality that remains unchanged. When needed, we provide applicable system documentation and demonstrations to show how those capabilities meet approved requirements. Design and configuration documentation focuses on the Nebraska-specific elements developed or configured during implementation, such as interfaces, data conversion, workflows, security roles, and reporting.

Formal DHHS sign-off confirms that the configured solution is ready to move into testing and establishes the approved baseline for the remaining implementation activities.

## Design and Configuration Phase Results

At the end of this phase, DHHS has an approved design and configuration baseline that supports testing, implementation, and ongoing operations. This includes configured environments, documented Nebraska-specific workflows and configuration decisions, established user roles, defined interfaces, and completed configuration activities.

With these decisions, configurations, and supporting materials in place, DHHS can move into testing with a clear understanding of the solution and the remaining implementation activities.

Proposal Section VI.A.2.II.d.3, Design and Configuration Narrative, provides a detailed description of Conduent's approach to completing the Design and Configuration phase.

### *VI.A.2.I.a.1.e Development and Testing [RFP V.D.5]*

**REQUIREMENT: RFP Section V.D.5**

Describe and include specific information regarding your approach and methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

As part of your response to items a. through h. incorporate the items below.

- Testing.
- Quality management.
- Collaboration and acceptance process.
- Release management and known issue documentation; and
- Any tool(s) used for testing and defect tracking.

a. Complete all Necessary Custom Development

Complete custom development on all requirements that require custom development. Upon completion and successful testing, DHHS will conduct a review of testing and upon successful outcomes, provide approval.

b. Complete all Necessary Reports

Complete all reports necessary and any required testing prior to go-live. Upon completion and successful testing, DHHS will conduct a review of testing and upon successful outcomes, provide approval.

c. Complete all Necessary Integrations (Interfaces, Imports, and Exports)

Complete all connections, data exchange mechanisms, and protocols to ensure efficient and reliable information flow. Convert all existing interfaces, imports and exports with changes as needed to integrate with the new system and test for performance. Upon completion and successful testing, DHHS will conduct a review of testing and upon successful outcomes, provide approval.

d. Develop a Testing Plan

Develop plan for testing the system's functionality, performance, compatibility, and integrations, including high-level tasks and timelines. Collect DHHS feedback on content and functionality and make all necessary changes as requested, on an agreed upon timeline. Testing plan must be maintained throughout the project lifecycle. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b) (vi)).

Develop, in collaboration with DHHS, a System Test Plan that describes the system testing approach and includes at a minimum each of the following:

i. Overall testing strategy for the following testing types: unit testing, system testing, integration testing, regressing testing, parallel testing, performance and load testing, manual and automated and/or scripted testing, disaster recovery and end-to-end integration testing of COTS products, if any.

ii. Test / Staging environment set-up.

iii. UAT plan.

iv. Approach for testing technical specifications.

v. Entrance criteria.

vi. Exit criteria.

vii. Configuration management.

viii. Testing documentation (e.g., test cases, test scripts, test case matrices added as design progresses).

ix. Process steps.

x. Inputs to system testing.

xi. Outputs to system testing.

xii. Reporting mechanisms, traceability and metrics.

xiii. Defects and defects resolution.

xiv. Pass/fail criteria.

xv. Suspension criteria and resumption requirements.

xvi. Testing documentation.

xvii. Testing activities.

xviii. Approach to quality control/quality assurance.

xix. Approach to bi-traceability to requirements and design.

xx. Resource roles and responsibilities.

xxi. Testing tools, techniques, and methods.

xxii. Acceptance criteria shall include, but not limited to; no high or critical defects in code released to production and all other defects will be reviewed and have an agreed upon remediation approach by the vendor and DHHS.

e. Execute and Evaluate Testing

Complete all required assigned testing. Conduct testing according to the Testing Plan and record results.

Testing must be as automated and self-documenting as possible (e.g., continuous unit testing). Analyze test results to identify issues, defects, and areas that require improvement. Collaborate with developers to fix issues and address performance issues. Collaborate with DHHS or designee to provide environments, data, and technical support for independent testing.

DHHS reserves the right to conduct independent testing of the system at any time. Testing plan must be maintained throughout the project lifecycle. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b)(vi)).

Testing should include the following:

i. Functionality

Verify system working as expected, according to the functional and technical requirements. Conduct regression testing for each upgrade released throughout the project prior to implementation. Conduct reliability testing to find system weaknesses to reduce the number of failures during deployment.

ii. Performance

Verify performance of each system module works as expected; testing system's bandwidth and performance, as expected in the work process. This will include load, stress, failure, and recovery tests.

iii. Compatibility

Verify browsers, devices, platforms, and operating systems are working as expected. Include printers, mobile devices, operating systems, and browsers. Coordinate with DHHS and specific system integration contacts to conduct integration testing. All inbound and outbound interfaces must be tested to ensure accurate and secure data transmission.

iv. Security

Conduct pre-go live penetration testing.

Conduct pre-go live security audits.

v. Accessibility

Provide DHHS or designee access to test cases, test results, and defect tracking via online tool(s). Ensure the test environment is available prior to UAT availability to facilitate interface testing with DHHS as provided in the Master Project Plan. DHHS reserves the right to inspect artifacts and results at any time.

f. Document Testing Results

Document testing results, summarize testing activities, and identify defects. A detailed testing results report must be developed.

g. Assist DHHS with User Acceptance Testing (UAT)

System must have a User Acceptance Testing (UAT) environment fully accessible to users at a time agreed upon with DHHS. Must assist DHHS with their User Acceptance Testing (UAT) efforts, from planning to execution to post-UAT support. Once the UAT is complete, all defects should be clearly captured and documented.

Responsibilities will include the following:

i. Assist DHHS with development of test scripts for the UA Testers, executing UAT plan, answer questions, and resolve any technical issues that arise.

ii. Collaborate with DHHS to capture and document identified defects, including clear descriptions, steps to reproduce, and severity levels.

iii. Work with the development team to prioritize and resolve defects identified during UAT, ensuring timely fixes and feedback to the testers.

iv. Provide DHHS with weekly defect resolution status.

v. Ensure the UAT environment is available before UAT scheduled start date.

h. Acceptance from DHHS on Testing Results

Must prepare and present a comprehensive testing report detailing the testing findings, addressing any concerns/questions by DHHS and response to concerns/questions. Critical and high defects must be corrected prior to go-live. All other defects will be reviewed and have an agreed upon remediation approach presented and approved by DHHS. UAT environment must be available

at least ninety-nine percent (99%) of the time during business hours in the project testing phase. All defects must be resolved or have a well-documented mitigation plan in place to gain formal approval to proceed with the project's next phase. Final review and approval required by DHHS..

***Development and Testing gives DHHS clear evidence that the complete MDR solution has been built, integrated, and tested to support Nebraska's program requirements and is ready to move toward production.***

Nebraska's Development and Testing phase must provide clear evidence that the complete MDR solution is ready for production. The solution includes the configured CMdS Rebate capabilities, Nebraska-specific reports, interfaces, imports, exports, data exchanges, security controls, and end-to-end business processes needed to support MDR operations.

Because CMdS Rebate Administration is a mature Medicaid Drug Rebate platform, the work focuses on completing approved gaps and Nebraska-specific components, then validating the solution as a whole. Testing confirms functional accuracy, data quality, performance, compatibility, security, accessibility, reliability, and operational readiness.

DHHS also needs ongoing visibility into testing progress, defects, known issues, supporting evidence, and release readiness. Formal approval depends on complete testing results, correction of high and critical defects, and an agreed path for any remaining issues.

## Complete the Development Needed for Nebraska

Nebraska requires any custom development identified through Requirements Validation and approved by DHHS to be completed and successfully tested before approval. Because CMdS Rebate is a mature Medicaid Drug Rebate platform, development is expected to focus on confirmed gaps and Nebraska-specific extensions that cannot be addressed through standard configuration. This may include report or extract logic, interfaces, imports, exports, and other approved components needed to support Nebraska's MDR operations.

DHHS needs clear evidence that each completed component traces to an approved requirement, works correctly with related solution functions and data exchanges, and is ready for operational use. Conduent provides this evidence through requirements traceability, documented test results, and demonstrations showing how each component performs within the full solution. After successful testing, DHHS reviews the results, addresses any questions or concerns with Conduent, and provides approval before the project moves toward production deployment.

## Complete and Validate Reports

Nebraska requires all reports needed to support MDR operations, oversight, financial activities, and program decision-making to be completed and tested before go-live. This includes standard CMdS Rebate reports and any Nebraska-specific reports, extracts, calculations, layouts, or correspondence identified during Requirements Validation. Examples include claims-level detail, invoicing and accounting reports available to labelers, and quarterly electronic reporting of rebate invoices, prior-period adjustments, and collections by NDC.

DHHS needs evidence that report content is complete, calculations and totals are accurate, data appears in the required format, and authorized users can access the information needed to perform their work. Conduent validates each report against approved requirements and source data, documents the results, and addresses identified issues before presenting the completed reports and testing evidence to DHHS for review and approval.

## Complete and Validate Integrations, Imports, and Exports

Nebraska's MDR operations depend on accurate and timely data exchanges with DHHS systems and external partners. Key exchanges include quarterly FFS paid claims from MMIS, encounter paid claims from HIA, formulary and provider information, CMS drug rebate files and utilization reporting, and data shared with IQVIA and labelers. The solution also provides claims, invoice, collection, and drug-information extracts needed by Nebraska's broader data environment.

Conduent completes the interfaces, imports, exports, connections, and data exchange protocols needed for the new solution, including conversion of existing exchanges and any changes required to operate with CMdS Rebate. Each exchange must support accurate data movement, secure transmission, error handling, reconciliation, and reliable end-to-end processing. Conduent tests the exchanges for functional accuracy, data quality, performance, and recovery from errors, then provides DHHS with the results and supporting evidence for review and approval.

## Develop and Maintain the System Test Plan

Nebraska requires a comprehensive System Test Plan that guides testing throughout implementation and remains current throughout the project lifecycle. Developed with DHHS, the plan provides a shared framework for:

- Testing strategy, activities, environments, and timelines
- Roles and responsibilities
- Entrance, exit, pass/fail, suspension, and resumption criteria
- Test cases, scripts, inputs, outputs, results, and supporting documentation
- Requirements and design traceability
- Quality controls, metrics, reporting, and acceptance criteria
- Defect identification, prioritization, resolution, and retesting
- Testing and defect-tracking tools

The plan covers the full range of testing needed for Nebraska's MDR solution, including unit, system, integration, regression, parallel, performance and load, disaster recovery, and end-to-end testing. It also defines where manual, automated, and scripted testing are used to provide reliable coverage and clear evidence that the solution performs as intended. The plan also describes how Conduent supports DHHS in planning, executing, and completing UAT. This gives DHHS a clear view of what will be tested, how results will be evaluated, and what must be completed before the solution advances to the next stage.

## Execute and Evaluate Solution Testing

Before the MDR solution moves into production, DHHS needs to see that it works as a complete system in Nebraska's operating environment. Testing brings together CMdS Rebate's proven capabilities with Nebraska-specific configurations, reports, interfaces, data exchanges, security controls, and day-to-day business processes to confirm they work together as intended.

The testing program examines the solution from several perspectives:

- **Functionality and operations.** Functional and technical requirements, data accuracy, integrations, accessibility, and end-to-end workflows
- **Performance and reliability.** Scalability, load, stress, failure, recovery, and disaster recovery
- **Compatibility.** Browsers, devices, operating systems, printers, and other components used by DHHS
- **Security and data exchange.** Pre-go-live penetration testing, security audits, and validation of all inbound and outbound interfaces

Where practical, Conduent uses automated and self-documenting tests to improve repeatability and preserve clear evidence of results. Manual testing remains important when activities require user interaction or professional judgment. DHHS and its designees have access to applicable environments, test artifacts, results, and defect information and may conduct independent testing as needed.

## Document Results and Manage Quality and Defects

DHHS needs a complete record of what has been tested, what issues were found, how those issues were addressed, and whether the solution is ready to move forward. Testing documentation and defect controls provide the evidence DHHS needs to evaluate solution quality, monitor open items, and make informed approval decisions.

Conduent uses [redacted] as the primary test management and defect-tracking tool, giving DHHS access to test cases, results, defects, and supporting evidence throughout the project. We also report testing progress, defect status, and emerging concerns through weekly project status reports and reviews. A detailed Testing Results Report summarizes completed activities, outcomes, metrics, unresolved items, and overall readiness.

We use the RTM to maintain traceability between approved requirements and design decisions to test cases, results, defects, corrective actions, and final disposition. Any defects are classified by severity, assigned to an owner, tracked through resolution, and retested before closure. Release records identify the functionality and corrections included in each release, while known-issue documentation captures any remaining items and their approved remediation plans.

## Support DHHS-Led User Acceptance Testing

User Acceptance Testing gives Nebraska's business users the opportunity to confirm that the MDR solution supports day-to-day rebate operations before go-live. Before UAT begins, Conduent provides State testers with training on the system, business processes, and tools they will use to execute test scripts, document results, and report defects. We also make the UAT environment available before the scheduled start date so users can begin testing as planned.

During UAT, Conduent works alongside DHHS to develop test scripts, answer questions, resolve technical issues, and validate workflows, reports, interfaces, operational processes, and usability. When users identify a defect, we help document the issue, assign its severity, coordinate resolution and retesting, and report defect status to DHHS each week.

## Provide Testing Results and Obtain Formal DHHS Acceptance

Before the MDR solution moves into production, DHHS needs a clear view of what was tested, what issues were found, and whether the solution meets the agreed acceptance criteria. Conduent prepares and presents a comprehensive Testing Results Report covering test activities, results, metrics, requirements traceability, defects, retesting, known issues, remediation actions, and overall readiness. We address DHHS questions and update the supporting evidence as needed.

All high and critical defects are corrected before go-live. Other defects must be resolved or have a documented remediation or mitigation plan approved by DHHS. Conduent also maintains at least 99% UAT environment availability during business hours throughout the testing phase.

DHHS's final sign-off confirms that the MDR solution, reports, interfaces, data exchanges, security controls, and operational processes are ready for production and documents the agreed path for any remaining known issues.

Proposal Section VI.A.2.II.d.4, Development and Testing Narrative, describes Conduent's detailed approach to development, testing, defect management, UAT support, and DHHS approval.

### *VI.A.2.I.a.1.f Data/File Conversion and Migration [RFP V.D.6]*

**REQUIREMENT: RFP Section V.D.6**

Describe and include specific information regarding your approach and methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly. The deliverables in a. through e. below require final review and approval by DHHS. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b)(vi)).

a. Develop a Data/File Conversion and Migration Plan

Provide details, images, and document file types for the data/file conversion and migration. The comprehensive data/file conversion and migration plan must be maintained throughout the project lifecycle.

The key aspects of the plan should include the following:

i. Data Management Strategy – must support integration, optimization, quality, stewardship, standards, and governance of data.

ii. Data/File Conversion Process – must describe the data/file conversion process and explain the process of transforming data and files from one format or architecture to another.

iii. Data/File Migration Process – must describe the data/file migration process and explain the process of moving data and files from the current system to the new system.

iv. Roles and Responsibilities – must define the roles and responsibilities for those responsible for data/file conversion and migration tasks.

v. Tasks and Timeline – must identify specific tasks needed to be completed for the conversion and migration, assign due dates and task owners.

vi. Contingency – must describe the approach to any foreseeable obstacles regarding data migration during the transition period. Include information about contingency procedures in the event of an unsuccessful cutover.

b. Develop a Conversion Mapping Guide

Develop a guide for the data/file conversion to transform data and files from one format or architecture to another, ensuring compatibility with the target system. Provide data layout documentation to DHHS. The detailed conversion and mapping guide must be maintained throughout the project lifecycle.

The key aspects of the plan should include the following:

i. Data Inventory - List all data sources, file types, and formats involved in the conversion. Describe data structures, field definitions, and relationships. Identify any unique or complex data elements requiring special handling.

ii. Data Mapping - Create detailed maps showing how data elements from the old system correspond to fields in the new system. Address differences in data structures, field names, data types, and coding schemes. Explain any data transformations or calculations required during conversion.

iii. Conversion Logic - Outline the steps involved in the conversion process, including data extraction from source systems, data cleaning and validation, data transformation and mapping, and loading data into the new system. Specify any tools, scripts, or software used for conversion.

iv. Testing and Validation - Describe testing procedures to ensure data accuracy and completeness after conversion. Define acceptance criteria for successful conversion. Outline processes for error handling and data reconciliation.

v. Documentation - Provide instructions for conversion team members. Include screenshots, examples, and decision trees for complex mappings. Document any assumptions, limitations, or known issues.

c. Perform the Data/File Conversion and Migration

Transform data and files from one format or architecture to another following the mapping guide so that it is compatible with the target system. Move all historical data and files to the new database(s).

d. Provide a Data/File Conversion and Migration Results Report

Describe present key conversion metrics to DHHS and stakeholders using tables, charts, and graphs to visually represent the results and highlight any potential concerns regarding the conversion process.

The key aspects of the report should include the following:

i. Number of records successfully converted.

ii. Number of records with errors or inconsistencies.

iii. Details of any data discrepancies encountered and how they were handled.

iv. Performance statistics of the conversion process (e.g., processing time, resource usage).

v. Additional details or supporting documentation, such as detailed data mapping tables, sample error logs, results, and system configuration logs.

e. Acceptance from the State on Data/File Conversion and Migration Results Present the final data migration results, address any concerns or questions raised by DHHS, and gain their formal approval to proceed with the project's next phase.

***Nebraska's MDR modernization depends on moving decades of rebate data into CMdS Rebate accurately, completely, and without disrupting ongoing operations.***

Nebraska needs a controlled path for moving historical MDR data and supporting files from the legacy environment into the CMdS Rebate solution. This includes rebate and manufacturer information, invoices, disputes, accounts receivable records, reference data, reporting information, and supporting documents needed for ongoing program operations.

This involves both converting information into formats compatible with CMdS Rebate and securely migrating it into the new databases. Throughout the process, DHHS needs clear mappings, reconciliation results, exception details, and measurable evidence that the migrated information is complete, accurate, and ready for operational use.

## Data/File Conversion and Migration Plan

Nebraska requires a comprehensive Data/File Conversion and Migration Plan that serves as the governing framework for all conversion and migration activities throughout the project lifecycle. The plan explains how Conduent converts legacy data and files into formats compatible with CMdS Rebate and then migrates them into the new environment. It defines the data management strategy, including integration, optimization, quality, stewardship, and governance, as well as roles and responsibilities, project schedules, contingency procedures, validation activities, and approval processes needed to support a successful transition.

The State requires an approach that maintains data quality, accountability, and traceability throughout the conversion effort. The plan covers historical rebate information, manufacturer records, invoice history, disputes, accounts receivable data, reference information, and supporting documents needed to continue MDR operations after migration.

Nebraska also requires clearly defined conversion tasks, timelines, owners, and contingency procedures. These procedures address error recovery, issue resolution, rollback, and the steps the team follows if migration or cutover does not proceed as planned.

The plan also identifies the source systems, data sources, file types, formats, and document layouts involved in the conversion. This includes database extracts, structured data files, supporting documents, and interface feeds, along with sample layouts, screenshots, or other images where they help explain the source information.

## Conversion Mapping Guide

Nebraska requires a detailed Conversion Mapping Guide that provides complete traceability between legacy source systems and the MDR Solution. The guide identifies each data source, file type, format, data structure, field definition, and relationship involved in the conversion. It then maps legacy data elements to their corresponding fields in CMdS Rebate and documents differences in field names, data types, coding schemes, calculations, and transformation rules.

The guide gives DHHS visibility into how legacy rebate data, financial information, manufacturer records, disputes, invoices, reference data, and related business information are extracted, cleaned, validated, transformed, and loaded into the target environment. It also identifies the tools, scripts, and conversion logic used to complete this work. Mapping documentation supports testing, reconciliation, auditing, troubleshooting, operational support, and long-term maintenance.

Testing and acceptance criteria define how Conduent confirms the accuracy and completeness of converted information and handles errors or discrepancies. The guide also documents assumptions, limitations, known issues, special handling requirements, and instructions for the conversion team. Data layouts, examples, screenshots, and decision trees are included where they help explain complex mappings or conversion decisions. Conduent maintains the guide throughout the project lifecycle as source information, mappings, and approved decisions change.

## Perform the Data/File Conversion and Migration

Nebraska requires Conduent to carry out the approved conversion and migration activities using documented mapping specifications, transformation rules, validation procedures, and reconciliation controls. The work moves through extraction, profiling, cleansing, transformation, validation, reconciliation, and loading, with each step confirming that the data is ready to move forward. Trial conversions allow the team to identify and correct mapping, data-quality, and processing issues before the final migration.

Trial conversion data also supports system and integration testing by giving the project team representative data to validate workflows, interfaces, reports, calculations, and reconciliation results before production migration.

The State needs confirmation that all required historical data and files, including financial information, reporting data, manufacturer records, invoices, disputes, and other operational records, are accurately migrated and available within the MDR solution before production deployment. Conduent compares source and target results, reviews exceptions with DHHS, corrects identified issues, and repeats conversion activities as needed.

The final migration follows the approved cutover plan and contingency procedures. Trial-conversion results, reconciliation reviews, validation findings, and production-migration results provide the evidence DHHS needs to confirm completeness, accuracy, integrity, and readiness for ongoing MDR operations.

## Data/File Conversion and Migration Results Reporting

Nebraska requires clear reporting on conversion and migration activities to support project oversight, readiness decisions, and final acceptance. The Data/File Conversion and Migration Results Report summarizes what was converted, how the results were validated, what exceptions were identified, and whether the migrated data is ready for operational use.

The report includes:

- Records successfully converted
- Records with errors, inconsistencies, or other exceptions
- Discrepancies identified and how they were resolved
- Reconciliation and validation results
- Processing time, resource usage, and other performance measures
- Supporting details such as mapping tables, sample error logs, test results, and system configuration logs

Conduent presents key results through tables, charts, and graphs so DHHS can quickly understand conversion quality, remaining concerns, and overall migration readiness.

## Acceptance from the State on Data/File Conversion and Migration Results

Nebraska requires formal DHHS review and approval of conversion and migration deliverables before the project moves into the next phase. Conduent presents the final migration results, including the approved plan, mapping documentation, validation and reconciliation findings, conversion metrics, exceptions, and readiness assessment. We address DHHS questions and concerns and provide additional evidence or corrections as needed.

The review confirms that required historical rebate data, manufacturer information, invoices, disputes, accounts receivable records, reporting information, and supporting files have been successfully converted, migrated, and made available in CMdS Rebate. Final DHHS approval confirms that conversion objectives have been met, identified issues have been resolved or have an agreed disposition, and the migrated environment is ready to support ongoing Medicaid Drug Rebate operations.

Proposal Section VI.A.2.II.d.5, Data/File Conversion and Migration Narrative, describes Conduent’s detailed approach to planning, mapping, validation, production migration, results reporting, and DHHS acceptance.

## *VI.A.2.I.a.1.g Training [RFP V.D.7]*

**REQUIREMENT: RFP Section V.D.7**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

Development of training and support must include comprehensive training programs for DHHS staff and end users to ensure effective utilization of the MDR solution during implementation. Describe and detail the approach to each of the following as it relates to training:

- Training Approach.
- Help and training documentation; and
- Any built-in online help system and online training available to system users (internal/external).

a. Develop a Training Plan

To successfully accomplish training goals and objectives, DHHS will assist in identifying the different training audiences within DHHS and impacted stakeholders that must be incorporated into the Training Plan.

Training Plan must include:

i. Identification of each target audience's roles, responsibilities, and unique training requirements in regard to the operation and/or support of the MDR solution.

ii. Training plan must define how the transfer of knowledge will enable end users to optimize their use of the new/updated module to support their business activities.

iii. Training plan must define the transfer of skills and knowledge to operations staff to effectively and efficiently deliver, support, and maintain the new/updated module according to the documented Service Level Agreements (SLAs).

b. Coordinate and Facilitate Training Instruction (On-Site)

NOTE: Training shall be provided one to two months prior to go-live.

Provide users and administrators with system training, including general use, reporting, report writing, database administration and modification, descriptions/definitions of all database tables and fields (including possible field values), record management and modification, and other key topics requested by DHHS. Design robust training sessions that include a combination of various modalities such as self paced e-learning modules, remote instructor-led sessions, and remote hands-on workshops, ensuring all users are thoroughly prepared.

All key project staff must be available throughout the duration of the vendor-led training session(s). All corresponding training materials and notes shall be provided to DHHS for internal, external, and system administrator users. The training materials shall be provided to DHHS at least ten (10) business days prior to the training begin date. The vendor will inform DHHS of any equipment needed to implement hands-on training at least thirty (30) calendar days prior to training begin date.

The key aspects of the training must include the following:

i. Overview and navigation of the designated system.

ii. End-to-end role-based training, including all system admin tools and any potential third-party functionality.

iii. Process for internal users to engage vendor support channels.

iv. System upgrade training any time new functionality is introduced.

Upon completion of training, DHHS staff will complete a survey to provide feedback confirming effectiveness of the training sessions. Should the results of the survey yield information that indicates the sessions had shortfalls and supplemental training and/or information is needed, DHHS reserves the right to require additional remote training at no additional charge to DHHS.

c. Provide Online Reference Training Materials for Administrator and User Manuals

Develop and maintain a complete set of training materials and documentation and provide users with training documentation which includes the key aspects listed below. DHHS must have 24x7 access to all reference materials (e.g., Requirements Matrices, Manuals, System Documentation, System Design Documentation, User Documentation, Business Rules Catalog, and Training Materials) and any applicable updated project documentation throughout all phases of the project.

Training materials and documentation for DHHS-led training must be received by DHHS for review, approval in accordance with the appropriate date as agreed upon in the Master Project Plan and within a timeframe that corresponds with scheduled training.

The key aspects for materials and/or documentation should include the following:

i. Operations manuals which shall provide guidelines for the operation and use of the System and/or System component(s) containing the policies, processes, and workflows.

ii. A data dictionary that contains field definitions and formats as well as database names and descriptions, database table, field type and length, valid values, and their corresponding descriptions.

iii. Step-by-step procedures for completing functions in the system.

iv. System documentation, including but not limited to: Specs for each system environment, process documentation for upgrading the system, etc.

v. Manuals that help users understand the purpose and operation of the system/system component(s) for each business process/major program/functional area.

vi. Acronyms used in user instructions must be identified and must be consistent with windows, screens, reports, and the data element dictionary.

vii. System navigation, online help, and policies and procedures.

viii. Documentation must be available online, regularly updated to reflect system enhancements, and delivered by the vendor to

ensure consistency and effectiveness.

ix. Provide an on-line search capability with context-sensitive help.

x. Provide the ability to produce a printable training manual upon request.

xi. Use version control to retain historical versions of documentation. Revisions must be clearly identified.

xii. User materials and/or documentation must be written and organized so that novice users can learn from reading the documentation how to access the on-line windows/screens, read reports, and perform all other user functions.

xiii. User manuals must contain a table of contents and an index.

xiv. Descriptions of error messages for all fields incurring edits must be presented and the necessary steps to correct such errors must be provided.

xv. Abbreviations must be consistent throughout the documentation.

xvi. Each user manual must contain a section describing all reports generated within the subsystem, which includes the following:

a. A narrative description of each report.

b. The purpose of the report.

c. Definition of all fields in the report, including detailed explanations of calculations used to create all data and explanations of all subtotals and totals.

d. Definitions of all user-defined, report-specific code descriptions and pages of each report.

Instructions for requesting reports or other outputs must be presented with examples of input documents and/or screens.

e. Instructions for making online updates must clearly depict which data and files are being changed.

d. Acceptance from the State on Training Results

Present training results, address any concerns or questions raised by DHHS, to obtain formal approval to proceed with the project's next phase. Once all training concerns are mitigated and resolved and properly documented, DHHS will provide final approval..

***Training prepares each MDR user to perform their role at go-live and gives DHHS the knowledge, resources, and support needed to operate CMdS Rebate successfully.***

DHHS needs a training program that prepares business users, administrators, technical staff, and support personnel to use the CMdS Rebate solution effectively. Each audience interacts with the solution differently, so training must reflect roles and responsibilities, business processes, system access, and ongoing support needs.

Conduent combines role-based instruction, hands-on practice, self-paced learning, online reference materials, and knowledge transfer tailored to each audience. Training begins one to two months before go-live and is scheduled around solution readiness, user availability, and milestones in the Master Project Plan.

The training program also shows users where to find current manuals, procedures, data definitions, online help, and other reference materials after training. Participant feedback and training results identify knowledge gaps and opportunities for additional training.

## Develop a Role-Based Training Plan

The Training Plan defines how Conduent prepares all end users, administrators, technical staff, and support personnel to use, operate, support, and maintain the MDR solution. The plan identifies:

- Training audiences, roles, and responsibilities
- Learning objectives and role-based curricula
- Courses, delivery methods, and instructors
- Training schedules, environments, and equipment needs
- Training materials and knowledge transfer activities
- Participation, evaluation, and readiness measures

Working with DHHS, Conduent documents each audience's system interactions and learning requirements. The plan then aligns those needs with practical exercises, supporting documentation, and evaluation methods.

Role-based learning paths focus each audience on the functions and information needed to perform its work. Business scenarios reflect day-to-day MDR activities such as invoice processing, rebate tracking, dispute resolution, reporting, record management, and administrative support.

The plan also addresses knowledge transfer beyond basic system use. Users learn how to apply CMdS Rebate functionality to their business activities, while operations and technical staff develop the skills needed to administer, troubleshoot, support, and maintain the solution in accordance with service-level requirements.

## Prepare and Deliver Training

Conduent delivers training one to two months before go-live using the approved solution configuration and representative data in a training environment. This timing gives users time to practice complete, role-based workflows, build proficiency, and address questions before production deployment. Training is coordinated with DHHS availability and project milestones, including UAT, operational readiness, and go-live.

The program combines on-site instructor-led sessions, virtual instruction through Microsoft Teams, self-paced learning, and hands-on workshops. Training covers:

- System overview, navigation, and end-to-end role-based workflows
- Reports, report generation, and ad hoc report writing
- System and database administration activities appropriate to each role
- Database tables, fields, valid values, and data-management functions
- Administrative tools, interfaces, and applicable third-party functionality
- Record creation, inquiry, maintenance, correction, and modification
- Processes for contacting Conduent support

Conduent keeps trainers, project staff, and subject matter experts available throughout each training session to explain system functions, answer questions, and provide additional guidance. We provide all training materials to DHHS at least 10 business days before training begins for review and approval. At least 30 calendar days before hands-on training, we identify facility, equipment, connectivity, and training-environment requirements.

Recorded sessions, self-paced courses, job aids, and other reference materials remain available to support onboarding, refresher training, and day-to-day use throughout operations. Conduent also provides training when upgrades or new functionality change how users perform their work.

## Provide Online Help and Training Documentation

DHHS needs training resources that remain useful after instructor-led sessions are complete. Users receive 24x7 access to current training, user, system, and reference documentation throughout the project lifecycle. Conduent maintains these resources under version control, clearly identifies revisions, and updates applicable documentation as the solution, business processes, and supporting procedures change.

Documentation includes:

- Operations and user manuals, including guidance for system administrators
- A data dictionary with database, table, field, format, and valid-value definitions
- Step-by-step procedures, job aids, and training guides
- Report guidance covering purpose, fields, calculations, totals, codes, and request procedures
- Instructions for online updates, error messages, and corrective actions

Documentation is written so novice users can follow it while still providing the detail administrators and experienced users need. Manuals include tables of contents, indexes, acronym definitions, and revision histories and are available in printable formats.

Searchable, context-sensitive online help provides instructions and guidance within applicable system screens. Our learning management tool provides access to training content, self-paced courses, job aids, FAQs, and other learning resources that support onboarding, refresher training, and day-to-day operations.

## Evaluate Training and Obtain DHHS Approval

Conduent tracks participation, course completion, assessment results, and user feedback to determine whether each audience is prepared to perform its responsibilities. Post-training surveys give DHHS staff an opportunity to evaluate the usefulness and effectiveness of each session.

When results identify a knowledge gap or training shortfall, Conduent provides supplemental remote training, updated materials, or focused user support at no additional cost to DHHS. Corrective actions and follow-up results are documented so DHHS can see how concerns were addressed.

At the conclusion of training, Conduent presents a summary of completed activities, participation, assessment results, participant feedback, identified gaps, and corrective actions. We address DHHS questions and concerns and obtain formal approval once training objectives have been met and outstanding concerns have been resolved.

Proposal Section VI.A.2.II.d.6, Training Narrative, describes Conduent’s detailed approach to training planning, curriculum development, delivery, documentation, evaluation, and DHHS acceptance.

## *VI.A.2.I.a.1.h Pre-Implementation [RFP V.D.8]*

**REQUIREMENT: RFP Section V.D.8**

8. Pre-Implementation Perform each of the following tasks as indicated below. Describe its methodology to accomplish all the tasks as stated directly below. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

a. Preparing and providing complete technical and user documentation for the MDR System to DHHS for its review and approval.

b. Preparing and providing an Implementation Plan to DHHS for its review and approval. The Implementation Plan, which is separate from the Project Plan, shall address, among other things, the roll out of the MDR System and a series of tasks and activities that must be accomplished starting 60 days prior to the planned Go-Live date. The Implementation Plan must be completed and submitted for DHHS approval 90 days prior to the Go-Live date.

c. The Implementation Plan must include at minimum the following: i. Description of the release and deployment of a new/updated module agreed upon by all stakeholders.

ii. The Implementation Checklists, along with each Implementation Checkpoint, must be clearly identified and documented in the plan.

iii. Compatibility between all the related assets and service components within each release package is verified.

iv. Via the configuration management process in place, verify that the integrity of release packages and their constituent components are maintained throughout the transition activities.

v. Define how release and deployment packages can be tracked, installed, tested, verified, and/or uninstalled or backed out, if appropriate.

vi. Define how deviations, risks, and issues related to the new or updated module are recorded and how corrective actions are ensured.

vii. Define how the transfer of knowledge will occur to enable end users to optimize their use of the new/updated module to support their business activities.

viii. Define the transfer of skills and knowledge to operations staff to effectively and efficiently deliver, support, and maintain the new/updated module according to the documented Service Level Agreements (SLAs).

d. Perform all tasks listed below:

i. Complete an Implementation Assessment that includes an analysis of DHHS current MDR operations and processes that results in a detailed Pre-Operational Transition Plan for transitioning DHHS current operations and data to the Contractor's MDR solution.

ii. Prepare and provide Implementation Checklists for use at each Implementation Checkpoint to DHHS for its review and approval. The Implementation Checkpoints are 60 days, 45 days, and 30 days prior to the Go-live date.

iii. Prepare and provide a formal "Go\No Go" standards to be applied at the Implementation Checkpoints for State review and approval.

iv. Prepare and provide tests to DHHS for its review and approval to determine whether the Go\No Go standards have been met at each of the intervals set forth therein. Such tests shall include checking the status of the implementation against the applicable meeting with all team members and stakeholders who own any part of the implementation checklist to validate sufficient progress and readiness to move forward.

v. Provide DHHS with assistance as reasonably requested in connection with DHHS's effort to assess implementation readiness at each Implementation checkpoint. The assistance shall include providing DHHS with vendor's assessment applying the Go\No Go standards.

vi. At DHHS's election, remediate any Deficiencies giving rise to a No-Go determination at an Implementation Checkpoint, and test the resolution to DHHS's reasonable satisfaction.

vii. Prepare and provide business continuity and disaster recovery plans to DHHS for its review and approval.

viii. Successfully test the business continuity and disaster recovery plans.

ix. Successfully execute the Infrastructure Plan and successful test the production environment established under such plan.

x. Prepare for DHHS review and approval of a contingency/mitigation plan to provide for a "triage\war room structure" and protocols to be observed if deficiencies are discovered upon Go Live including a DHHS decision to take the MDR System out of production and restore the MDR functionality in the current system (the "Contingency Plan").

xi. Prepare and provide a cut-over plan to DHHS for its review and approval. The cut-over plan shall detail final tasks and steps needed to move the system into production - including plans to check connectivity with all for all interfaces and interface partners to ensure data can be sent and received in production.

xii. Successfully execute the Data Security Plan. Prepare for DHHS review and approval a system and operations security plan and describe how the Vendor will protect DHHS data and how the MDR System meets all Federal and State security regulations.

xiii. Prepare a Go Live contact list.

xiv. Successfully execute the Data/File Conversion and Migration Plan and Data Conversion Test Plan.

xv. Successfully execute the pre-Go Live portions of the Stakeholder Communications Plan.

xvi. Successfully execute the pre-Go Live portions of the Contingency Plan for any preparations needed to be able to immediately move to the plan in the event of a significant implementation failure.

xvii. Provide the third-party auditing vendor such information and other assistance as it may reasonably request with respect to its readiness assessment.

xviii. Before elevation into the production environment, final certification from the Vendor that the MDR System is technically ready for implementation and Go Live.

***Conduent's pre-implementation approach reduces risk, validates operational and technical readiness, and prepares DHHS for a controlled transition to MDR production. Our experience gives Nebraska a dependable partner through go-live and ongoing operations.***

## Pre-Implementation

Conduent's pre-implementation methodology prepares DHHS personnel and stakeholders for a controlled transition to production. It provides the governance, visibility, and readiness evidence needed to support informed deployment decisions. Our approach brings together documentation, implementation planning, checkpoint reviews, operational preparation, configuration control, and security validation. Together, these activities reduce implementation risk and support a stable transition to MDR production operations.

**Prepared for a Successful Day One Go-Live**

- Reduces implementation risk through coordinated planning, governance, and readiness validation
- Prepares DHHS personnel for new processes, system responsibilities, and ongoing operations
- Confirms data, interfaces, security controls, and business processes are ready for production
- Provides the documentation, oversight, and deployment support needed for a controlled Go-Live

### *Technical and User Documentation*

Conduent prepares and delivers complete technical and user documentation for DHHS review and approval before implementation. These materials reflect the configured MDR solution and support system use, operations, training, administration, maintenance, and long-term knowledge transfer. Deliverables include:

- User manuals
- Operations guides
- Role-based procedures
- System documentation
- System design documentation
- Data dictionaries
- Business rules documentation
- Report definitions
- Training materials
- Configuration guidance
- Online help resources

Our proven documentation processes produce materials that are clear, consistent, and easy to follow. These materials provide users with consistent guidance for rebate processing, reporting, system administration, troubleshooting, and support. Documentation supports day-to-day operations, knowledge transfer, staff onboarding, and continued use and support of the solution.

Conduent also updates and maintains documentation as the solution evolves. Current documentation supports staff onboarding, preserves institutional knowledge, enables internal training, and reduces reliance on key personnel or vendor resources. This gives DHHS a durable knowledge base that supports long-term ownership and successful operation of the MDR solution throughout the contract lifecycle.

## *Implementation Plan*

Conduent develops and submits a comprehensive Implementation Plan to DHHS at least 90 days before Go-Live. Separate from the overall Project Plan, the Implementation Plan serves as the operational roadmap for deployment readiness, production transition, and stabilization activities. The plan defines activities beginning 60 days before Go-Live and gives DHHS clear visibility into milestones, dependencies, responsibilities, deployment activities, readiness evidence, and risk mitigation actions.

Our Implementation Plan addresses the specific needs of the MDR solution, including:

- Rebate operations workflows
- Data conversion and migration
- System interfaces
- Reporting
- Customer support
- Operational readiness
- Security validation
- Business continuity
- Disaster recovery
- CMS certification support activities

The plan also addresses required release and deployment activities, implementation checkpoints, compatibility and configuration controls, testing and verification, rollback procedures, knowledge transfer, and operational readiness.

The plan provides a framework that aligns technical, business, user, and operational preparation activities. This helps DHHS evaluate progress through objective evidence, identify open risks or dependencies early, and make informed decisions before production deployment.

## *Implementation Assessment and Pre-Operational Transition Plan*

Conduent performs an Implementation Assessment to evaluate DHHS's current MDR operations and processes. The assessment results in a detailed Pre-Operational Transition Plan for moving current operations and data to CMdS Rebate.

The assessment examines how DHHS currently performs core rebate activities, manages supporting data, and coordinates the processes that must continue through implementation. It identifies current workflows, operational and technical dependencies, data considerations, transition risks, and other factors that could affect readiness or continuity of MDR operations.

Using these findings, Conduent develops the Pre-Operational Transition Plan. The plan identifies the activities, responsibilities, dependencies, sequencing, and readiness milestones needed to move from the current environment to production use of CMdS Rebate. It also identifies actions needed to maintain critical rebate functions while operations and data transition to the new solution.

Together, the assessment and plan give DHHS a clear view of current-state conditions, transition requirements, risks, and outstanding actions. This helps DHHS evaluate whether operational processes, data, personnel, and supporting activities are prepared for go-live.

## *Implementation Checkpoints and Go/No-Go Readiness*

DHHS needs a clear, evidence-based way to evaluate readiness as go-live approaches. Conduent develops Implementation Checklists for formal readiness checkpoints 60, 45, and 30 days before Go-Live. Each checklist identifies required activities, accountable owners, dependencies, supporting evidence, open risks and issues, corrective actions, and approval status. This gives DHHS a clear view of progress and remaining work across all implementation areas.

The checklists address readiness for:

- System configuration and the production environment
- Data conversion and migration
- Interfaces and security controls
- User access and training completion
- Operational procedures and documentation
- Business continuity and disaster recovery
- Production and ongoing support

Supporting evidence may include test results, conversion outcomes, training records, security validations, documentation status, and other readiness assessments.

Conduent also develops formal Go/No-Go standards and supporting readiness tests for DHHS review and approval. At each checkpoint, DHHS, Conduent, and responsible task owners review progress and evidence against the approved criteria. Identified gaps are documented with corrective actions so DHHS can determine whether implementation should proceed or additional work is required before the next checkpoint or production deployment.

## *Compatibility Validation and Configuration Management*

DHHS needs confirmation that all components within each release are compatible and that approved configurations remain intact as they move toward production. Prior to deployment, Conduent performs compatibility validation across MDR solution components, including application functionality, databases, system interfaces, security services, reporting services, infrastructure components, and external partner integrations. These validations confirm that solution components operate together as a cohesive environment supporting rebate processing, dispute management, reporting, customer support, and data exchange activities.

Conduent's formal configuration management process maintains version control, traceability, and integrity for application components, business rules, interfaces, reporting objects, security configurations, database structures, and deployment artifacts. Configuration baselines, release contents, testing outcomes, approvals, and deployment records provide a complete audit trail from development through production.

Before production deployment, Conduent validates that release components have completed required testing, approvals, documentation reviews, and packaging activities. This control reduces the potential for unauthorized changes, configuration conflicts, version issues, integration defects, and operational disruptions that could affect MDR operations, reporting, data exchanges, or system performance.

## *Business Continuity and Disaster Recovery Readiness*

DHHS needs confirmation that critical MDR operations can continue or be restored if a disruption occurs during or after deployment. Conduent prepares Business Continuity and Disaster Recovery Plans for DHHS review and approval. The plans address the people, processes, technology, data, and recovery activities needed to protect essential rebate functions and support an orderly response to an operational or system disruption.

Before Go-Live, Conduent successfully tests both plans to confirm that recovery procedures can be carried out and that critical MDR services can be restored as intended. We document test results, address identified gaps, and provide DHHS with evidence of recovery readiness before the solution moves into production.

## *Production Environment, Contingency, Cutover, and Security Readiness*

Before Go-Live, Conduent executes the Infrastructure Plan and tests the production environment to confirm it can support MDR users, interfaces, data processing, security controls, and ongoing operations. This establishes the technical environment needed for the remaining deployment and cutover activities.

Conduent also prepares a Contingency Plan for DHHS review and approval so the project is ready to respond if deficiencies arise at Go-Live. The plan defines the triage and war-room structure, response protocols, mitigation actions, and decision procedures. It also addresses how MDR functionality would be restored in the current system if DHHS decides to remove CMdS Rebate from production.

With the production environment validated and contingency measures in place, the Cutover Plan identifies the final tasks, sequencing, responsibilities, and validation activities needed to move CMdS Rebate into production. It includes connectivity checks with interfaces and interface partners to confirm that production data can be sent and received.

Security requirements apply throughout these activities. Conduent executes the Data Security Plan and prepares the System and Operations Security Plan for DHHS review and approval. These plans describe how DHHS data is protected and how the MDR solution meets applicable federal and State security requirements.

## *Final Go-Live Preparation*

As Go-Live approaches, Conduent coordinates the final people, data, communications, and contingency activities needed for deployment. We prepare and maintain a Go-Live contact list identifying DHHS, Conduent, interface partners, and other responsible contacts so the team can coordinate cutover activities and respond quickly to issues.

Conduent successfully executes the Data/File Conversion and Migration Plan and Data Conversion Test Plan to confirm that required data is prepared for production use. We also complete the pre-Go-Live activities defined in the Stakeholder Communications Plan so affected parties understand deployment timing, responsibilities, support channels, and upcoming actions.

We also complete the pre-Go-Live portions of the Contingency Plan, including the staffing, communications, escalation, and recovery preparations needed for immediate activation if a significant implementation failure occurs. Together, these activities give DHHS a coordinated view of final readiness and the resources available to support deployment.

### *Independent Readiness Support and Technical Certification*

DHHS may engage an independent third-party auditor to assess implementation readiness. Conduent provides the information and assistance reasonably requested for that review, including relevant project artifacts, testing evidence, operational documentation, readiness results, and access to appropriate project personnel. This support allows DHHS and its auditor to independently evaluate the project's preparation for production.

Before CMdS Rebate is elevated into the production environment, Conduent provides final certification that the solution is technically ready for implementation and Go-Live. This certification gives DHHS Conduent's formal assessment of technical readiness, while DHHS retains authority to decide whether the project proceeds to production.

## *Operational Readiness and Knowledge Transfer*

DHHS needs both end users and operations staff prepared to perform their responsibilities when CMdS Rebate goes live. Conduent uses product documentation, operational procedures, role-based training materials, documentation reviews, shadowing activities, and production support preparation to help DHHS staff build practical familiarity with the solution and supporting processes.

Operations and technical staff receive additional preparation for administering, monitoring, supporting, and maintaining the solution. This includes system and security administration, incident and release management, disaster recovery, reporting, customer support, and performance monitoring in accordance with applicable service-level requirements.

## *Pre-Implementation Tasks and Activities Summary*

Conduent's pre-implementation approach gives DHHS a controlled, transparent, and evidence-based path to production deployment. We prepare technical and user documentation, develop the Implementation Plan, document required plan contents, conduct the Implementation Assessment, develop the Pre-Operational Transition Plan, create implementation checklists, establish Go/No-Go standards, validate compatibility, maintain configuration control, prepare continuity and security plans, support third-party readiness activities, and prepare DHHS personnel for operational support.

Successful MDR implementation requires coordinated preparation across people, processes, technology, security, data, documentation, and operations. By providing objective implementation evidence, structured governance, documented responsibilities, and practical knowledge transfer, Conduent enables informed Go-Live decisions and establishes a strong foundation for stable, compliant, and sustainable MDR operations.

Proposal Section VI.A.2.II.d.7, Pre-Implementation Narrative, describes Conduent's detailed methodology for completing the required pre-implementation activities and obtaining DHHS approval to proceed with Go-Live.

### *VI.A.2.I.a.1.i Implementation [RFP V.D.9]*

**REQUIREMENT: RFP Section V.D.9**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

Detail approach and assurances to items a. through d. of the following as it relates to Implementation:

- Change management.
- Issue management.
- Defect management.
- Process for monitoring initial operation of the implemented system.

a. Perform and Complete all Aspects of the Implementation.

Perform all activities required for successful implementation of the system into production. Upon full operation, after the system implementation, delivery of all functionalities, mitigation/resolution of concerns, DHHS will provide final approval. As such, there shall be a transition to the system being official and formally available in the production environment for all internal and external users.

b. Assist the State with On-Site Implementation Assistance for Go-Live Week (On-Site)

Provide DHHS with on-site implementation assistance for go-live week with hands-on support during the critical period when the system transitions into full operation. Upon mitigation/resolution of all concerns DHHS will provide final approval.

Responsibilities will include the following:

i. Go-live-Week Support – Monitor system performance and promptly identify any technical issues, assisting users with navigating the system and resolve any issues, document feedback and questions for post-launch analysis and improvement, and escalate any major issues to relevant teams.

ii. Ensure all key staff on-site throughout the duration of go-live week session. In the event there are substantial open unresolved issues (i.e., DHHS business operation needs), extension and/or additional on-site assistance to be required at no additional charge to DHHS.

c. Acceptance from the State on Implementation Results.

Present implementation results and address any concerns/questions raised by DHHS, to gain formal approval to proceed with the project's next phase. This includes gathering feedback, demonstrating the achieved benefits, and addressing any remaining concerns. Upon mitigation/resolution of all concerns DHHS will provide final approval.

d. Additional Information

Work performed by DHHS is subject to State and Federal statutes that may not be within the system's capabilities. This may necessitate a change order initiated by DHHS. Vendor must be responsive to making prescribed modifications promptly and in accordance with the change order process to achieve timely compliance and avoid service disruption. Pricing related to change order requests must be referenced in Part III – Optional Services Miscellaneous Support and Enhancements and/or referenced Hourly Rates per title/role on the Cost Sheet.

***Go-Live is where planning becomes performance. Conduent moves CMdS Rebate into full production while protecting Nebraska's rebate operations and keeping users supported throughout the transition.***

DHHS needs an implementation that does more than deploy the technology. It must confirm that critical MDR processes work in production, interfaces and data exchanges operate as expected, users can perform their responsibilities, and authorized internal and external users can access the solution.

Throughout Go-Live and initial operations, Conduent works alongside DHHS to monitor performance, provide hands-on support, and manage changes, issues, and defects through resolution. We also provide clear implementation results and readiness evidence so DHHS can evaluate performance, address remaining concerns, and provide final approval once CMdS Rebate is fully operational.

## Complete the Production Implementation

Conduent performs the activities needed to move CMdS Rebate into production and establish full operation. Following DHHS approval to proceed, we execute the approved cutover and deployment activities, complete final data migration, activate and verify interfaces, confirm security and user access, and validate critical production processes. We also confirm that scheduled jobs, reports, data exchanges, and other functions needed for day-to-day MDR operations are working as expected.

These activities confirm that all required functionality is available, documentation and operational materials have been delivered, and users and support personnel are prepared for production use. Conduent coordinates remaining dependencies and monitors the transition closely to identify concerns early. We address issues that could affect rebate processing, reporting, data exchange, user access, system performance, or other critical MDR activities.

During initial operations, Conduent works with DHHS to verify production results, respond to user questions, and track issues and defects through resolution or DHHS-approved mitigation. This gives DHHS clear evidence that CMdS Rebate is operating effectively and that remaining concerns are understood and being addressed.

Once implementation is complete and DHHS approves the results, CMdS Rebate becomes the official production solution and is made available to authorized internal and external users.

## Provide On-Site Go-Live Support

Conduent provides on-site implementation assistance throughout Go-Live week. All key project, technical, data, interface, testing, and operational personnel remain on-site throughout Go-Live week to support the transition into full operation.

The on-site team:

- Monitors system performance and critical MDR activities
- Helps users navigate the solution and resolve questions
- Identifies, documents, and coordinates resolution of technical and operational issues
- Records user feedback and questions for post-launch review
- Escalates major concerns to the appropriate project and technical resources
- Provides DHHS with updates on system performance, open concerns, and corrective actions

If substantial unresolved issues affect DHHS business operations, Conduent extends or adds on-site assistance at no additional cost to DHHS. Support continues as needed to address those concerns and assist DHHS in evaluating implementation results.

## Monitor Initial Operations and Manage Changes, Issues, and Defects

Initial operations require active monitoring and clear controls, so concerns are identified and addressed before they disrupt MDR activities. Conduent monitors application availability, interfaces, scheduled processing, data exchanges, security, user access, and critical rebate functions to confirm that the production solution is operating as expected.

Throughout implementation and operations, Conduent applies the following controls:

- **Change management.** Proposed changes are evaluated for urgency, business need, implementation impact, and risk. Changes proceed through the approved change-control process and require appropriate DHHS review and approval.
- **Issue management.** Implementation concerns are documented, prioritized, assigned, and tracked through resolution. DHHS receives visibility into business impacts, dependencies, corrective actions, owners, and target dates.
- **Defect management.** Suspected system defects are documented, evaluated, corrected, and retested. Defects remain open until the resolution has been validated and the appropriate closure decision has been made.
- **Initial operations monitoring.** Production performance and MDR processes are reviewed to identify emerging concerns, recurring issues, support needs, and conditions that require escalation or corrective action.

These controls help distinguish system defects from training questions, configuration concerns, process issues, and potential enhancement requests. They also give DHHS a clear view of system stability and progress toward full operation.

## Present Results and Obtain DHHS Approval

Conduent presents implementation results to DHHS and addresses questions, concerns, and feedback raised during production deployment and Go-Live support. The review summarizes completed implementation activities, delivered functionality, production performance, data and interface status, user feedback, and the disposition of identified issues and defects.

When concerns remain, Conduent documents the required corrective or mitigation actions and provides supporting evidence to show those actions are completed. The review also demonstrates how the implemented solution supports Nebraska's MDR business and operational objectives.

After required functionality is fully operational and implementation-related concerns have been resolved or appropriately mitigated, DHHS provides formal approval to complete the Implementation phase and proceed to the next phase of the project.

## Respond to Statutory and Regulatory Changes

Conduent understands that changes to State or federal statutes, regulations, policies, or program requirements may require modifications beyond the system's existing capabilities. When DHHS initiates a change order, Conduent promptly evaluates the prescribed modification and follows the approved change-order process to support timely compliance and limit service disruption.

Applicable pricing is based on the services and rates identified in Part III, Optional Services, Miscellaneous Support and Enhancements, and the applicable hourly rates by title or role in the Cost Sheet.

Proposal Section VI.A.2.II.d.8, Implementation Narrative, describes Conduent's detailed methodology for production deployment, Go-Live support, initial operations monitoring, change and issue control, defect resolution, and DHHS acceptance.

## *VI.A.2.I.a.1.j Post-Implementation [RFP V.D.10]*

**REQUIREMENT: RFP Section V.D.10**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly. Include a detailed approach to each of the following as it relates to Maintenance, Operations and Support. For sections a. through d. DHHS will review and approve, with the designated State stakeholder providing final sign-off. Detail items a. through d. of the following as it relates to Post-Implementation:

- System maintenance.
- The proposed evolution, planned releases, and on-going development philosophy of core products and software tools in your proposed system.
- How system improvements, change requests, and bug fixes are prioritized. Also include details as to how DHHS's projects are prioritized amongst other client requests.
- Response times for all levels of support, escalation process of support, support tracking system, and support severity level determinations;
- What support options are available (e.g., phone, chat, support ticket, etc.)

a. Coordinate and Facilitate a Post-Implementation Review Teleconference Meeting

Meeting should focus on evaluation of project objectives being met, efficiency of project management, documentation of lessons learned and troubleshooting for future guidance. Meeting should be scheduled within two (2) weeks following the acceptance of the Warranty Period.

b. Provide a Plan for Enhancement Requests

For DHHS change requests that are not federally required, and qualify as enhancements rather than defects, provide a plan to address expected timelines, cost estimates and pricing.

c. Provide a Transition Plan from Implementation to Maintenance, Operations and Support

Plan must outline steps and activities for transitioning from system implementation to Maintenance, Operations and Support. Plan must define transition goals, transition activities, identify support resources, assign support responsibilities, and identify support communication channels. Plan must designate an account manager, responsible for business specifications/requirements being fulfilled and serve as point of contact for escalations, questions and support.

d. Final Sign-Off

Once all objectives have been met satisfactorily, prepare final sign-off documents, to include, at a minimum: project summary, list of deliverables, acceptance criteria, statement of satisfaction, and signature fields for stakeholders. Present post-implementation results, address any concerns or questions raised by the State, and gain State's formal approval to proceed with the project's next phase.

Final sign-off documents must be prepared and provided to the State for review. All concerns must be mitigated and resolved and be properly documented by the vendor. Once complete, the designated State of Nebraska stakeholders will provide final sign-off approval of the system.

***Conduent's post-implementation methodology provides DHHS with a stable path from implementation to long-term operations by combining proactive system maintenance, responsive support, disciplined change governance, release management, and continuous improvement of the MDR System.***

Conduent's integrated maintenance, operations, and support approach combines proactive monitoring, incident management, release governance, security oversight, and continuous improvement processes to maintain system stability and support evolving program requirements.

## System Maintenance

Upon transition to Operations and Support, Conduent assumes responsibility for maintaining system stability, security, availability, and performance. Routine maintenance procedures govern monitoring, incident management, security reviews, change control, and continuous improvement activities, ensuring the MDR System operates efficiently throughout the contract lifecycle.

Our operational teams continuously monitor system health, capacity, availability, and performance using automated alerts, dashboards, and reporting tools. The operations team proactively identifies and addresses potential issues before they affect business operations or system users.

**Sustaining Reliable Operations and Continuous Improvement**

- Maintains system stability, security, and performance through proactive maintenance and monitoring
- Provides responsive support with defined service levels, escalation procedures, and multiple support channels
- Uses structured governance to prioritize enhancements, change requests, and defect resolution
- Supports long-term business objectives through planned releases, product evolution, and continuous improvement

Conduent performs scheduled preventive maintenance to preserve system reliability and optimize performance. These activities include configuration reviews, capacity assessments, log analysis, system tuning, security reviews, and vulnerability remediation. We document and evaluate maintenance as part of ongoing operational reviews to identify trends and opportunities for improvement.

### *Monitoring and Performance Management*

Continuous monitoring validates system performance and service availability while measuring transaction processing efficiency, resource utilization, and operational trends. Regular performance metric reviews identify emerging risks and optimization opportunities.

Operational reports provide DHHS with visibility into system health, maintenance activities, service-level performance, incident trends, and operational risks. When performance variances are identified, Conduent investigates root causes and implements corrective actions to maintain service quality and operational effectiveness.

### *Incident and Problem Management*

Conduent utilizes a centralized support management process to log, categorize, prioritize, track, and resolve incidents. Support teams use defined escalation procedures to route issues to the appropriate technical resources based on severity, business impact, and urgency.

For recurring or significant issues, Conduent performs root cause analysis to identify contributing factors and implement corrective actions that reduce repeat occurrences. This disciplined approach improves system reliability while strengthening overall service delivery.

## *Security and Compliance Management*

Security maintenance activities protect system assets and sensitive information through ongoing monitoring, access reviews, vulnerability management, and compliance assessments. Conduent maintains a compliant security posture through routine evaluations of security controls and user permissions against applicable federal and State requirements.

The security team prioritizes identified vulnerabilities according to risk and remediates them using established response procedures. Security monitoring and periodic reviews help maintain a secure operating environment while supporting compliance with evolving regulatory requirements.

## *Backup and Recovery Management*

Conduent maintains comprehensive backup and recovery procedures that support business continuity objectives and protect critical program data. The operations team performs scheduled backups according to approved retention requirements and regularly tests recovery procedures to validate restoration processes and confirm recovery readiness.

Documentation is maintained to reflect current backup processes, recovery procedures, and system configurations, ensuring the Department can rely on tested recovery capabilities throughout system operations.

## *Product Evolution, Planned Releases, and Development Philosophy*

Conduent maintains a roadmap-driven product evolution strategy that supports continuous improvement, planned innovation, and long-term sustainability of the MDR solution. DHHS priorities, regulatory requirements, user feedback, operational experience, emerging technologies, and industry best practices guide product enhancements.

Our development philosophy emphasizes configurable solutions before customization, iterative improvement through controlled release cycles, security-by-design principles, regulatory compliance, and operational stability. This approach enables DHHS to benefit from ongoing innovation while minimizing operational disruption and preserving future upgrade flexibility.

The release team manages planned releases through governance reviews of business value, operational impact, technical dependencies, and regulatory requirements. Releases may include security enhancements, performance improvements, usability enhancements, reporting improvements, technology upgrades, and approved client-requested enhancements.

Before deployment, Conduent validates each release through testing, quality assurance review, approval, and stakeholder communication to confirm compatibility, stability, and production readiness.

## *Prioritization of System Improvements, Change Requests, and Bug Fixes*

Conduent uses a structured governance framework to evaluate, prioritize, and manage post-implementation improvements, change requests, and defect resolution activities. Governance reviews align resources with DHHS priorities while preserving system stability and operational continuity.

Enhancement and change request prioritization considers business value, regulatory requirements, operational impact, user demand, security considerations, technical feasibility, implementation complexity, resource availability, and alignment with DHHS objectives. Release planning includes approved requests based on priority and available capacity.

### *Bug Fix Prioritization*

The support process categorizes defects by severity and business impact to guide timely response and resolution.

**Priority 1 (Critical)** issues include production outages, data integrity concerns, security vulnerabilities, or mission-critical functionality failures with no available workaround.

**Priority 2 (High)** issues significantly affect business operations but have limited workaround options available.

**Priority 3 (Medium)** issues affect non-critical functionality and allow business operations to continue using acceptable workarounds.

**Priority 4 (Low)** issues include cosmetic defects, minor usability concerns, and documentation updates addressed as part of routine maintenance activities.

### *Prioritization of DHHS Requests Among Other Clients*

The portfolio governance process reviews DHHS requests using objective criteria that balance contractual commitments, regulatory obligations, operational priorities, and resource availability.

Priority decisions consider:

- Federal and State compliance requirements
- Contractual commitments and service-level obligations
- Business and program impact
- Operational risk and service continuity
- Cybersecurity considerations
- Technical dependencies
- Resource availability

Critical DHHS initiatives receive elevated priority when compliance, operational continuity, security, or service delivery risks exist. Regular governance reviews and stakeholder communication promote transparency and give DHHS clear visibility into prioritization decisions, project status, and release planning activities.

## *Support Services*

Conduent provides comprehensive support services through a centralized support management framework that combines service desk operations, technical support, incident management, escalation management, reporting, and stakeholder communication. The team uses an integrated tracking system to monitor issue status, ownership, escalation activity, and resolution progress.

### *Support Response Times and Severity Levels*

Support severity is determined using objective criteria that evaluate business impact, operational risk, service availability, user impact, and available workarounds.

**Table VI.A.2.I.a.1.j-1. Support Response Times and Severity Levels**

| Severity | Description | Response Time |
|---|---|---|
| Severity 1 (Critical) | Production outage, security incident, or data integrity issue | Within 1 hour |
| Severity 2 (High) | Significant functionality impairment with limited workaround | Within 4 business hours |
| Severity 3 (Medium) | Moderate operational impact with acceptable workaround | Within 1 business day |
| Severity 4 (Low) | Minor issue, informational request, or enhancement request | Within 2 business days |

The support team reviews and adjusts severity classifications throughout the incident lifecycle as additional information becomes available.

### *Escalation Process*

Conduent's tiered escalation model provides structured routing to the appropriate level of technical support based on issue complexity and business impact.

**Tier 1 Support** provides ticket intake, issue logging, user communication, and initial troubleshooting.

**Tier 2 Support** performs advanced troubleshooting, configuration analysis, application support, and functional problem resolution.

**Tier 3 Support** addresses software defects, architecture concerns, advanced technical issues, and engineering-level investigations.

Management oversight is applied to critical incidents, unresolved problems, and situations that may affect service levels or operational continuity.

### *Support Tracking System*

The team manages support requests in a centralized ticket system that maintains a complete support operations record. The system tracks issue categorization, severity assignments, escalation history, stakeholder communications, service-level performance, root cause analysis, and final resolution details.

The tracking platform provides real-time visibility into support activities while supporting reporting, audit requirements, performance measurement, and continuous service improvement.

### *Support Options Available*

Conduent's multi-channel support model gives users flexible access to assistance through the option best aligned with their needs. Available support options include:

- Online support ticket portal
- Telephone support
- Email support
- Virtual support sessions
- Knowledge base resources
- User documentation
- Self-service support tools
- Scheduled operational review meetings

Regardless of the intake channel used, all requests are documented and tracked through the centralized ticket management system, supporting accountability, visibility, and consistent service delivery.

## Post-Implementation Review Teleconference Meeting

Within two weeks following acceptance of the Warranty Period, Conduent will coordinate and facilitate a Post-Implementation Review Teleconference Meeting with DHHS stakeholders. The review will evaluate achievement of project objectives, system performance, project management effectiveness, operational stability, support performance, user adoption, and stakeholder satisfaction.

Participants will review lessons learned, discuss troubleshooting outcomes, identify opportunities for improvement, and document recommendations that support future operational success. DHHS receives formally documented meeting findings, action items, and future guidance for review.

## Plan for Enhancement Requests

Conduent maintains a structured enhancement management process for DHHS change requests that qualify as enhancements rather than defects. Each request undergoes business, technical, operational, and security review to evaluate alignment with program objectives, user impact, operational benefits, implementation complexity, dependencies, and overall business value.

Enhancement requests receive acknowledgment within one business day, with initial assessments typically completed within five business days. The team generally provides cost estimates, implementation recommendations, and preliminary schedules within ten business days.

The product team adds approved enhancements to the prioritized backlog and schedules them through established release governance processes.

Cost estimates identify scope, assumptions, labor categories, resource requirements, implementation timelines, and projected pricing. DHHS receives cost estimates and schedule projections before enhancement work is approved and scheduled. No enhancement work proceeds without DHHS review and approval.

## Transition Plan from Implementation to Maintenance, Operations, and Support

Conduent develops a formal Transition Plan that governs the transfer of responsibility from implementation teams to ongoing maintenance and support personnel. The plan defines:

- Transition objectives
- Support activities
- Assigned resources
- Communication procedures
- Escalation paths
- Knowledge transfer activities
- Operational handoff requirements
- Performance expectations

Transition activities begin before implementation completion and continue through stabilization, supporting continuity of operations as responsibilities move from implementation to Maintenance, Operations, and Support.

Defined responsibilities govern monitoring, maintenance, incident management, release management, reporting, security oversight, and stakeholder communications.

A designated Account Manager serves as DHHS's primary business contact and escalation point. The Account Manager is responsible for service delivery oversight, requirement fulfillment, stakeholder communication, escalation management, and coordination across Conduent support teams.

## Final Sign-Off

Upon successful completion of implementation objectives and resolution of all identified concerns, Conduent prepares and submits final sign-off documentation for DHHS review and approval.

Final sign-off materials include:

- Project summary
- Deliverable inventory
- Acceptance criteria results
- Statement of satisfaction
- Concern resolution documentation
- Stakeholder signature pages

Conduent presents post-implementation results, addresses stakeholder questions, and documents all concern resolution activities. Following successful review and approval by designated State of Nebraska stakeholders, final sign-off confirms readiness for ongoing maintenance, operations, support, and continuous improvement activities.

## *VI.A.2.I.a.1.k Maintenance, Operations and Support [RFP V.D.11]*

**REQUIREMENT: RFP Section V.D.11**

Following a successful warranty period and sign-off, the project will immediately transition into the Maintenance, Operations, and Support phase.

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

a. Complete system upgrades only after new versions or software updates have been fully tested, found critical error-free, and agreed upon with DHHS.

b. Provide timely system fixes and resolution of issues deemed critical by DHHS.

c. Have a regular maintenance schedule established with DHHS; regular maintenance should only be performed outside normal business hours.

d. Mechanisms for soliciting and incorporating user feedback shall be established to prioritize system enhancements and address user pain points effectively. Continuous improvement initiatives shall be undertaken to enhance user experience and system functionality.

e. Provide proper notification and details regarding when the system is or will be unavailable to users.

f. Provide a process for DHHS to identify and improve the system based on defects, feature enhancements, or needed adjustments.

g. Provide a change control process before any change or amendment may be completed to add or modify a requirement of the awarded contracts. As part of MDR project governance, DHHS and vendor will establish a Change Control Board (CCB) to manage the change control process.

h. Designate an account manager for the life of the contract whose role is to ensure business specifications/requirements are being fulfilled and be an escalation point for questions and support; this individual should be ascertained during the development of the Staffing Plan.

i. Training materials must be readily accessible online, regularly updated to reflect system enhancements, and delivered by the vendor to ensure consistency and effectiveness

j. Conduct an annual independent third-party penetration test of the solution that includes the Open Web

Application Security Project (OWASP) Top 10 and submit the annual results to the designated individual for DHHS

k. Conduct an annual disaster recovery test for the solution and submit the annual results to the designated individual for DHHS.

l. Conduct an annual independent third-party security controls assessment that meets the National Institute for Standards and Technology (NIST) SP 800-53 moderate standard and submit the annual results to the designated individual for DHHS.

m. Monitor and report on the status of all deliverables and applicable performance standards required during the DDI and M&O phases of the contract.

n. Help Desk Support.

i. Provide staffing and operation of a Help Desk during normal business hours.

ii. Provide level 0 (customer self-service), level 1(basic support), level 2 (moderate support) that includes as appropriate, escalation to the State, and level 3 (technical/integration) support related to the functionality of the scope of work. Level 1 help desk shall be the first point of contact and responsible to log the issue and, if possible, assist the user and resolving the issue without the need for escalation.

iii. Provide support for all critical system failures or issues Monday to Friday 7AM to 6PM Central Time during DHHS business days.

iv. Provide help desk training to specified State staff members prior to vendor supplied help desk staffing and operation roll off.

***DHHS requires stable operations, continuous improvement, strong governance, security oversight, and responsive user support. Conduent delivers these outcomes through proven Medicaid expertise and disciplined operational management.***

Following warranty acceptance, DHHS requires a stable operating environment. The environment must support maintenance, software updates, issue resolution, and daily rebate administration activities without disrupting operations. The State expects tested upgrades and patches before deployment. Maintenance activities should occur outside normal business hours. Users should receive timely notification of planned or unplanned service interruptions.

**Proven Operations, Results, and Medicaid Expertise**

- More than 27 years of Medicaid drug rebate administration experience supporting state Medicaid agencies
- Proven support model focused on operational continuity, compliance, and continuous improvement

The State also requires timely resolution of critical issues and dependable access to rebate administration functions, reporting, and program information. These activities help maintain operational continuity and support reliable program performance throughout the contract period.

Please refer to Proposal Section VI.A.2.II.d.10, Maintenance, Operations and Support Narrative, for a comprehensive description of Conduent's Maintenance, Operations, and Support methodology, including our specific processes, controls, and procedures for addressing each requirement identified in RFP Section V.D.11.

## Drive Continuous Improvement

DHHS views M&O as more than system support. The State requires a structured process to collect feedback, evaluate enhancement requests, address defects, and prioritize improvements. These activities strengthen system functionality and user experience.

User feedback, operational observations, and enhancement recommendations drive improvements that align with business needs, regulatory requirements, and program priorities. This approach helps Nebraska balance platform stability with continuous operational improvement.

**Outcome:** DHHS receives a structured process for prioritizing enhancements, addressing user feedback, and improving system functionality over time.

## Maintain Strong Governance and Accountability

DHHS requires governance processes that provide visibility into operational performance, service commitments, support activities, and program outcomes. Effective governance supports transparency, accountability, and informed decision-making throughout the contract lifecycle.

The State requires a designated Account Manager who serves as the primary contact for operational and support matters. Nebraska also requires a Change Control Board (CCB) to evaluate proposed changes based on business value, effort, risk, operational impact, and project priorities.

DHHS further requires monitoring and reporting of contract deliverables, service commitments, and performance standards established during both the DDI and M&O phases.

**Outcome:** DHHS maintains visibility into operational performance, service commitments, support activities, and contract deliverables.

## Maintain Security, Compliance, and Operational Readiness

DHHS requires ongoing compliance with security standards, operational controls, and Medicaid program requirements. Annual independent assessments validate security controls, recovery procedures, and risk management practices.

The State requires annual independent penetration testing that includes assessment of the OWASP Top 10. Nebraska also requires annual disaster recovery testing and annual independent security controls assessments that align with NIST SP 800-53 Moderate requirements. These assessments provide visibility into security and recovery controls and support program integrity and risk management objectives.

These activities support security, compliance, business continuity, and long-term operational readiness.

**Outcome:** DHHS maintains security compliance, validates recovery capabilities, and receives ongoing visibility into security and risk management activities.

## Support Users Through Training and Help Desk Services

DHHS requires a support model that provides the resources and assistance users need to perform daily rebate administration activities. Training materials must remain accessible online and reflect system enhancements, configuration changes, and operational updates.

The State also requires a multi-level Help Desk structure. Support includes self-service resources, routine assistance, advanced functional support, technical support, issue escalation, and support for critical system issues during business hours. Knowledge transfer and Help Desk transition support are also important to prepare State staff for future support responsibilities when needed.

**Outcome:** DHHS users receive timely support, current training resources, and access to the assistance needed to perform daily responsibilities effectively.

## Support Long-Term Program Success

DHHS requires a support model that sustains operational excellence, regulatory compliance, and continuous program improvement. The State expects a support model that combines mature technology, experienced operational resources, strong governance, and disciplined service management practices.

Success extends beyond routine maintenance and technical support. The State’s objective is to maximize rebate recoveries, maintain compliance with CMS requirements, improve operational efficiency, and provide stakeholders with timely access to reliable program information.

Proven technology, experienced rebate professionals, and Medicaid expertise help DHHS sustain a modern and efficient MDR Program. The combination of operational services, governance, user support, security oversight, and continuous improvement positions the State for long-term program success and operational stability.

**Outcome:** DHHS sustains efficient rebate operations, regulatory compliance, and continuous program improvement throughout the contract period.

### *VI.A.2.I.a.1.I Turnover Phase [RFP V.D.12]*

**REQUIREMENT: RFP Section V.D.12**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

Provide DHHS assistance with respect to:

- Assignment of any hosting agreement to DHHS, if applicable.
- Implementation of the MDR solution on DHHS or DHHS designee infrastructure, if applicable.
- Transition of maintenance, operations and support of the MDR solution to DHHS or one or more DHHS designees.
- Transition of any other Services to DHHS or one or more DHHS designees.

Provide a draft plan for transition of the MDR System and providing the required training to DHHS or a third party designee of DHHS to operate the solution if at termination or expiration, DHHS determines not to extend the Term with respect to maintenance, operations and support services (the “Turnover Plan”).

The Turnover Plan shall include a detailed listing of all hardware and software required to operate the MDR solution and require that upon DHHS request, or one hundred and eighty (180) days prior to the end of the Term, the vendor shall provide for DHHS review and approval, a Knowledge Transfer Plan that includes the proposed curriculum, timeline and sample training materials that will be used to support DHHS or a DHHS designee in taking over the system management and operation.

The Turnover Plan and Knowledge Transfer Plan shall provide for a transition and training period of at least twelve (12) months.

As a part of the turnover plan, the vendor must provide:

i. a documented roadmap with time estimates to migrate the system to the state’s infrastructure (or tenant in the case of a cloud implementation).

ii. document how future licensing and support of the product would be accomplished if the DHHS takes over the hosting function.

iii. detail list of all licenses required, and frequency for payment of each license once the DHHS takes over the solution.

***Turnover protects the continuity of Nebraska’s MDR operations by giving DHHS or its designee the information, training, assets, and transition support needed to assume responsibility for the solution.***

Conduent works with DHHS to transition MDR operations and supporting services at the end of the contract without disrupting rebate collections, manufacturer communications, reporting, data exchanges, or other critical program activities. Depending on DHHS’s turnover preferences, Conduent supports applicable transfer of hosting arrangements and the transition of maintenance, operations, support, and other services to DHHS or its designee.

Successful turnover requires more than transferring documents at the end of the contract. DHHS or its designated successor needs a clear understanding of the solution, its operating requirements, applicable licenses, system dependencies, support procedures, and the activities needed to maintain MDR operations. The receiving organization must also have sufficient time to review the information, complete training, observe operational activities, resolve knowledge gaps, and prepare to assume its assigned responsibilities.

Conduent supports this transition through an approved Turnover Plan, a detailed Knowledge Transfer Plan, current technical and operational documentation, infrastructure and licensing information, and direct coordination with DHHS and the designated successor. The Turnover Plan and Knowledge Transfer Plan provide for at least 12 months of transition and training, allowing responsibilities to move in a controlled manner while current operations continue.

## Prepare the Turnover Plan

The Turnover Plan defines how Conduent transitions CMdS Rebate and associated services at contract expiration or termination. It provides an overarching roadmap for transferring applicable hosting arrangements, infrastructure responsibilities, system operations, maintenance, support, and other services to DHHS or a DHHS-designated successor.

The plan identifies the scope of the transition and the responsibilities that must be transferred. It also documents the sequencing, dependencies, timelines, participants, decision points, and readiness evidence needed to coordinate turnover without interrupting MDR operations. Transition planning addresses the whole solution, including the application, data, interfaces, reporting, security, technical support, business operations, documentation, and applicable third-party products or services.

The Turnover Plan includes:

- Roles and responsibilities for Conduent, DHHS, and any designated successor
- Transition activities, milestones, dependencies, and target completion dates
- Hardware, software, infrastructure, interface, security, and operational requirements
- Applicable hosting, maintenance, operations, and support responsibilities
- Documentation, data, repository, and knowledge-transfer requirements
- System access and security transition activities
- Licensing and third-party support considerations
- Risks, issues, mitigation actions, and turnover readiness criteria
- Acceptance activities needed to confirm that assigned responsibilities have been transferred

The plan also identifies any additional tasks needed by DHHS to support the transition. This allows turnover activities to reflect whether DHHS assumes responsibilities directly, assigns them to another contractor, or uses a combination of State and third-party resources.

Throughout turnover, Conduent coordinates with DHHS and the designated successor to clarify responsibilities, identify outstanding needs, and address conditions that could affect the transition. This gives all parties a common understanding of the remaining work and helps protect continuity while services and responsibilities move to the receiving organization.

## Develop the Knowledge Transfer Plan

A successful turnover depends on DHHS or its designee having the knowledge needed to operate, administer, support, and maintain the MDR solution. Upon DHHS request, or no later than 180 days before the end of the contract term, Conduent provides a Knowledge Transfer Plan for DHHS review and approval. The plan identifies the staff who will assume responsibility for the solution and the knowledge each group needs.

The Knowledge Transfer Plan defines the proposed curriculum, audience-specific learning requirements, training schedule, and sample training materials. It also addresses the technical, operational, administrative, and support procedures associated with the responsibilities being transferred. The plan also explains how Conduent and DHHS identify and address any remaining knowledge gaps.

Training covers both CMdS Rebate operations and the activities needed to sustain operations. Business personnel learn how to continue assigned MDR functions such as rebate processing, invoicing, collections, dispute activities, and reporting. Technical and administrative personnel receive training to support user access, configurations, interfaces, monitoring, maintenance, security, and release activities.

Conduent uses instructor-led sessions, demonstrations, documentation reviews, operational walkthroughs, hands-on practice, and direct collaboration with the staff currently performing the work.

Together, the Turnover Plan and Knowledge Transfer Plan provide at least 12 months for transition and training. This gives the successor time to become familiar with the solution, take on responsibilities in a controlled manner, resolve outstanding questions, and confirm that the necessary knowledge and resources are in place before turnover is complete.

## Support Hosting and Infrastructure Transition

The transition begins with a clear understanding of the environment required to operate the solution. Conduent identifies applicable hardware, software, infrastructure services, databases, interfaces, security components, operating environments, network dependencies, administrative access, and third-party products. This information helps DHHS or its designee evaluate the target environment and determine what must be available before the solution can be transitioned.

As part of the Turnover Plan, Conduent provides a documented roadmap for moving CMdS Rebate to State infrastructure or to the State's tenant in a cloud environment, as applicable. The roadmap identifies major activities, dependencies, responsibilities, and estimated timeframes. It also addresses the coordination needed for data, interfaces, security, access, testing, cutover, and operational readiness.

The infrastructure transition must account for more than installation of the application. DHHS needs to understand how the target environment will support:

- Application and database operation
- Inbound and outbound interfaces
- Data storage, backup, and recovery
- Security controls and user access
- Reporting and scheduled processing
- Monitoring and technical support
- Business continuity and disaster recovery
- Applicable third-party products and services

Conduent works with DHHS, its designee, and applicable hosting or technology providers to identify dependencies and clarify the information needed for planning. We also support validation activities associated with the transition, including confirmation that the receiving environment is prepared for the functions and responsibilities it will assume.

Any transfer of hardware, software, hosting arrangements, administrative access, or other assets remains subject to applicable ownership, licensing, contractual, and security requirements. The Turnover Plan identifies these considerations so DHHS can distinguish between assets that transfer, services that must be replaced or reassigned, and products that require new or continued licensing arrangements.

## Transition Maintenance, Operations, Support, and Other Services

Turnover may require transferring maintenance, operations, and support of CMdS Rebate to DHHS or your designees. It may also include other services associated with the solution. DHHS needs a clear view of these responsibilities so the receiving organization can prepare the staffing, procedures, access, tools, and vendor relationships needed to continue operations.

Conduent documents the applicable service responsibilities and coordinates their transition according to the approved Turnover Plan. Depending on the scope selected by DHHS, responsibilities may involve:

- Application and technical support
- System and user administration
- Monitoring and incident response
- Interface and data-exchange support
- Reporting and data-management activities
- Security administration
- Maintenance and release coordination
- Operational procedures and business support
- Documentation and knowledge repositories
- Coordination with applicable vendors and service providers

The turnover process identifies how each responsibility is currently performed, the procedures and information needed to continue it, and the dependencies that could affect the receiving organization. It also identifies applicable service levels, schedules, support contacts, escalation paths, and operational controls associated with the transferred services.

Conduent provides the documentation and knowledge-transfer support needed to explain current operating procedures and help the receiving organization understand its responsibilities. This includes operating guides, technical documentation, system procedures, data and interface information, support processes, reporting instructions, security guidance, maintenance information, and other materials applicable to the final turnover scope.

Nebraska-owned data and information are provided in DHHS-approved formats, consistent with contractual, security, and legal requirements. Applicable project and operational repositories, documentation, training materials, and supporting artifacts are also transferred or made available.

The objective is not simply to hand over a list of services. DHHS needs confirmation that each assigned responsibility has a receiving owner, that required information and access are available, and that outstanding risks or dependencies are understood. This allows maintenance, operations, support, and other services to continue as responsibilities move from Conduent to DHHS or its designee.

## Provide Hardware, Software, and Licensing Information

The Turnover Plan includes a detailed listing of the hardware and software required to operate and support the solution. The inventory identifies applicable solution components and their relationship to the operating environment. Depending on the final configuration, this may include application software, database technologies, operating-system components, reporting tools, integration services, security products, cloud resources, and other third-party products.

For each applicable license, Conduent identifies information needed for future planning, including:

- Product or component name
- Licensing model
- Quantity, capacity, or usage basis, as applicable
- License owner or contracting party
- Payment or renewal frequency
- Support and maintenance requirements
- Applicable transferability or reassignment provisions
- Vendor or support contact information
- Dependencies on other products or services

If DHHS assumes hosting responsibility, Conduent documents how future product licensing and support would be obtained and maintained. This includes applicable renewal processes, support arrangements, maintenance options, product updates, and relationships with third-party vendors.

Providing this information allows DHHS to assess future costs, procurement needs, renewal timelines, support dependencies, and contractual obligations before turnover is complete. It also helps distinguish between products included with the solution, products licensed through Conduent, and products for which DHHS or its designee may need to establish a direct agreement.

The migration roadmap and licensing information work together. The roadmap explains what is required to move the solution, while the inventory identifies the products, licenses, and support arrangements needed to operate it in the receiving environment. Together, they give DHHS a practical basis for infrastructure, procurement, budgeting, and support planning.

## Complete Knowledge Transfer and Turnover Readiness

Before turnover is complete, DHHS needs clear evidence that the required documentation, system information, training, access, and service responsibilities have been transferred. Conduent works with DHHS and any designated successor to review progress, identify remaining gaps, and confirm that turnover activities are moving forward as planned.

The final readiness review confirms that technical and operational documentation has been provided to DHHS and the successor and that hardware, software, licensing, and support information is complete. It also verifies that applicable data, repositories, interfaces, and assets have been addressed; training and knowledge-transfer activities are complete; and maintenance, operations, support, and other service responsibilities are ready for transition. If

hosting or infrastructure responsibilities are part of the transition, the review also confirms that those activities are complete. Any remaining risks, dependencies, or follow-up actions are documented, so DHHS has a clear understanding of what remains and how it will be addressed.

Throughout the turnover period, Conduent remains available to explain documentation, answer questions, address knowledge gaps, and coordinate with DHHS, its designated successor, and applicable third parties. Outstanding actions are tracked through completion, so the receiving organization has the information and resources needed to assume its responsibilities.

The final turnover review gives DHHS a clear record of what has been transferred, which responsibilities have changed, and whether any follow-up work remains. DHHS reviews the Turnover Plan, approves the Knowledge Transfer Plan, and directs the final transition of responsibilities. These activities support an orderly transfer of the MDR solution and its supporting services while protecting the continuity of Nebraska's rebate operations.

Proposal Section VI.A.2.II.d.11, Turnover Phase Narrative, describes Conduent's detailed methodology for turnover planning, hosting and infrastructure transition, service transfer, knowledge transfer, licensing support, and DHHS acceptance.

### VI.A.2.I.a.2 Business Requirements [RFP V.E]

**REQUIREMENT: RFP Section V.E**

The solution must address the requirements specified in Attachment A – MDR Functional Requirements. All individual requirements, bidder instructions and criteria for meeting the full requirement are included in the document.

Bidder must provide inline responses to the requirement to simplify bidder's response and Evaluator's review.

The Omnibus Budget Reconciliation Act (OBRA) of 1990 established the Drug Rebate Program. Congress created the Medicaid drug rebate program to reduce state and federal Medicaid expenditures for prescription drugs. Manufacturers of covered outpatient drugs (i.e., rebate-eligible drugs) are generally required to enter into rebate agreements with the Secretary of Health and Human Services and pay quarterly rebates to States. Most drugs covered under Medicaid are self-administered products (e.g., tablets) dispensed by pharmacies. However, Medicaid administered by medical professionals in physicians' offices, clinics, or inpatient and outpatient hospitals.

Rebates are calculated using two sources of data: (1) pricing data submitted by manufacturers and (2) utilization data (i.e., the total number of rebate-eligible units for each drug) compiled by States. Each quarter, manufacturers send pricing data to the Centers for Medicare & Medicaid Services (CMS), which then calculates an unofficial unit rebate amount (URA). CMS makes a URA for each national drug code (NDC) available to States in the Drug Data Reporting (DDR) system for Medicaid. Each State determines the rebate amount that a manufacturer owes by multiplying the URA for each of the manufacturer's NDCs by the corresponding number of rebate-eligible units. Manufacturers are ultimately responsible for calculating an official URA and paying rebates to States.

Please see Attachment A – MDR Functional Requirements.

***Nebraska's MDR business objectives will be met with Conduent's CMS-certifiable Medicaid Drug Rebate platform that is built by Medicaid experts for Medicaid experts.***

Table VI.A.2.I.a.2-1 lists the Attachment A requirements addressed in Proposal Section Attachment A, MDR Functional Requirements.

**Table VI.A.2.I.a.2-1. Attachment A – Functional Requirements**

| Requirement Type | Requirement Numbers Addressed |
|---|---|
| Invoice Management (IVM) | IVM-01 through IVM-76 |
| Accounting (ACC) | ACC-01 through ACC–15 |
| Customer Support, Documentation, and Training (CDT) | CDT-01 through CDT-30 |
| Staffing and Resource (SAR) | SAR-01 through SAR-03 |
| Turnover and Contract Closeout (TCC) | TCC-01 through TCC-04 |
| Project Management and Implementation (PMI) | PMI-01 through PMI-24 |

## Nebraska's MDR Objectives and Business Requirements

Nebraska's Medicaid Drug Rebate Program is essential to controlling prescription drug costs while ensuring Medicaid members maintain access to medically necessary medications. The Omnibus Budget Reconciliation Act (OBRA) program reduces both State and Federal Medicaid expenditures while strengthening the long-term sustainability of the Medicaid program.



Nebraska requires a rebate administration solution that not only complies with CMS Medicaid Drug Rebate Program (MDRP) requirements. Our solution helps maximize rebate collections, minimize administrative effort, improve transparency, and adapt to evolving Federal regulations.

Conduent's CMS-certifiable CMdS Rebate Administration solution is purpose-built to achieve these objectives. CMdS was developed specifically for Medicaid Drug Rebate administration and supported by more than 27 years of experience. CMdS combines proven technology, configurable workflows, and experienced rebate professionals to maximize collections while simplifying program administration.

## Meeting Nebraska's Business Objectives

Conduent aligns every component of the CMdS Rebate solution with Nebraska's operational and financial goals.

**Table VI.A.2.I.a.2-2. CMdS Rebate Solution Meets DHHS Objectives**

| DHHS Objective | Conduent Solution |
|---|---|
| Maximize rebate collections | Identifies every eligible rebate opportunity, validates rebate calculations, performs automated claim and invoice audits, and minimizes write-offs |
| Reduce administrative burden | Automates calculations, unit conversions, invoice preparation, workflows, and exception processing so staff can focus on oversight rather than transaction processing |
| Reduce manufacturer disputes | Performs multiple automated validation checks before releasing invoices, resulting in higher-quality invoices and faster collections |
| Improve program visibility | Provides role-based dashboards and more than 50 operational and financial reports for real-time visibility into collections, receivables, disputes, payments, and program performance |
| Ensure CMS compliance | Supports current CMS Medicaid Drug Rebate requirements while providing the flexibility to accommodate future regulatory changes |
| Support future growth | Supports Federal, Supplemental, and State-only rebate programs while integrating fee-for-service and managed care claims within a single configurable platform |

Nebraska benefits from objective rebate administration, transparent manufacturer interactions, and recommendations aligned solely with the State's financial and operational objectives. The State directly receives rebate dollars collected, maximizing the financial benefit of the Medicaid Drug Rebate Program.

### *End-to-End Medicaid Drug Rebate Administration*

The CMdS Rebate Administration solution automates and manages the complete rebate lifecycle from rebate-eligible claims through manufacturer payment, reconciliation, reporting, and audit support.

Each calendar quarter, pharmaceutical manufacturers submit pricing information – including Average Manufacturer Price (AMP) and other required pricing data – to CMS. CMS calculates an unofficial Unit Rebate Amount (URA) for each rebate-eligible National Drug Code (NDC) and publishes the data through the Drug Data Reporting (DDR) system.

CMdS combines CMS pricing information with Nebraska's rebate-eligible utilization data from pharmacy and physician-administered drug claims to calculate manufacturer rebate invoices. The system applies the appropriate URA, performs required unit conversions, validates utilization data, executes multiple automated quality assurance audits, and identifies exceptions requiring review before generating invoices.

The solution automatically excludes nonparticipating manufacturers, routes exceptions through configurable workflows, and provides Nebraska staff with complete visibility and approval authority before invoice release.

Following invoice generation, CMdS manages the remainder of the rebate lifecycle, including:

- Manufacturer payment processing
- Accounts receivable management
- Interest calculations
- Dispute management and resolution
- Financial reconciliation
- Comprehensive operational and financial reporting
- Audit support

## Conduent’s Medicaid Drug Rebate Calculation

The Medicaid Drug Rebate Program depends upon the accurate integration of manufacturer pricing information with Nebraska's Medicaid utilization data to determine rebate amounts owed by pharmaceutical manufacturers.

**Rebate Calculation.** Rebates are calculated using two sources of data: (1) pricing data submitted by manufacturers and (2) utilization data, compiled by States. Each quarter, manufacturers send pricing data to the Centers for Medicare & Medicaid Services (CMS), which then calculates an unofficial unit rebate amount (URA). CMS makes a URA for each national drug code (NDC) available to States in the Drug Data Reporting (DDR) system for Medicaid. Each State determines the rebate amount that a manufacturer owes by multiplying the URA for each of the manufacturer’s NDCs by the corresponding number of rebate-eligible units. Manufacturers are ultimately responsible for calculating an official URA and paying rebates to States.

Each calendar quarter, manufacturers submit pricing information – including Average Manufacturer Price (AMP) and other required pricing data – to the Centers for Medicare & Medicaid Services (CMS). CMS calculates an unofficial Unit Rebate Amount (URA) for each rebate-eligible National Drug Code (NDC) and makes the URA available to participating states through the Drug Data Reporting (DDR) system.

Nebraska then combines CMS pricing information with rebate-eligible utilization data from pharmacy and physician-administered drug claims to calculate rebate invoices. For each NDC, the rebate amount is determined by multiplying the applicable URA by the number of eligible units utilized during the reporting quarter. Manufacturers calculate the official rebate obligation, remit payment to the State, and resolve any disputed utilization or pricing with Nebraska.

Conduent automates and validates every phase of this process through its CMdS Rebate Administration solution. The system imports qualified claims, applies CMS pricing data, performs required unit conversions, calculates rebate amounts, and executes multiple automated quality assurance audits before generating invoices. The solution automatically excludes nonparticipating manufacturers, identifies data anomalies requiring review, and provides rebate specialists with workflow tools to resolve exceptions before releasing invoices. Nebraska staff retain complete visibility and approval authority throughout the invoicing process.

Following invoice generation, CMdS supports the complete rebate lifecycle, including manufacturer payments, accounts receivable management, dispute resolution, interest calculations, financial reconciliation, and comprehensive reporting. More than 50 standard reports provide Nebraska with detailed operational and financial information supporting management oversight, audit readiness, and CMS reporting requirements. The result is a streamlined, highly accurate rebate administration process that maximizes collections while reducing administrative effort and improving manufacturer payment timeliness.

### *Nebraska Benefits*

Nebraska will receive an accurate, fully validated rebate process that maximizes collections, reduces manual effort, improves payment timeliness, and minimizes manufacturer disputes. Conduent brings more than technology – we bring Medicaid experts to the project with extensive and deep experience in state Medicaid programs. Every rebate dollar collected is passed directly to the State.

## Modern, Configurable Technology

CMdS was designed specifically for Medicaid Drug Rebate administration and provides a modern, configurable platform that reduces operational complexity while supporting future Medicaid modernization initiatives.

Key capabilities include:

- Federal, Supplemental, and State-only rebate processing
- Fee-for-service and managed care integration
- Automated rebate calculations and unit conversions
- Automated claim and invoice validation
- Role-based security
- Workflow-driven exception management
- Comprehensive audit trails
- Point-and-click graphical user interface
- Secure file exchange
- Configurable business rules
- CMS and NCPDP standards support

Unlike fragmented solutions requiring multiple applications, CMdS manages the complete rebate lifecycle within a single integrated platform.

Nebraska receives a scalable, CMS-aligned rebate solution that reduces administrative burden, improves operational efficiency, and positions the State to adapt to future business and regulatory requirements. Figure VI.A.2.I.a.2-1 represents the CMdS lifecycle management process.

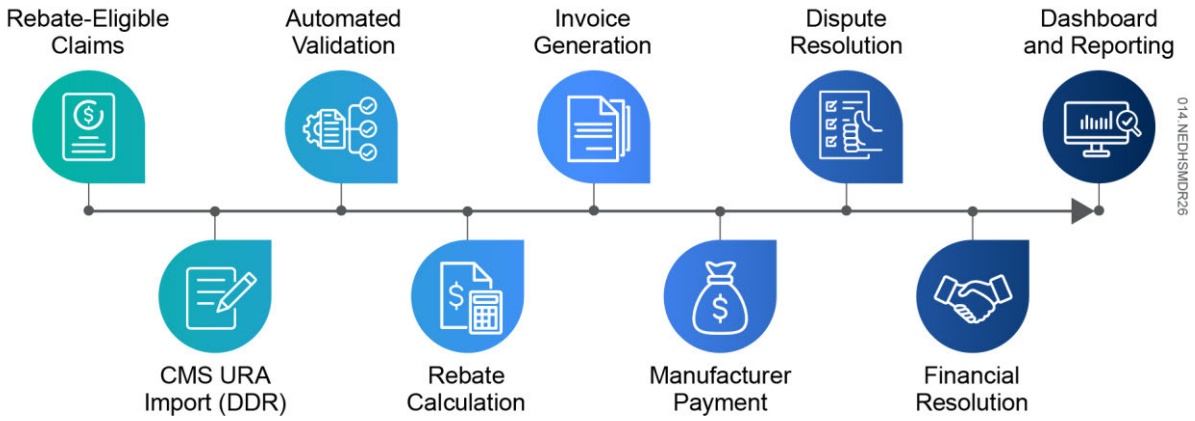



**Figure VI.A.2.I.a.2-1. CMdS Manages the Complete Rebate Lifecycle**

We assign an experienced team of Conduent Medicaid PBM practitioners to assess and implement Conduent Medicaid System (CMdS) Rebate Administration solution aligned with each client's goals and financial objectives. Unlike some vendors, Conduent does not have a learning curve for Medicaid rebate administration requirements.

Your needs are never placed behind the needs of others. We are Independent. We do not own a Specialty Pharmacy or a multi-state pooled PDL supplemental rebate program. This remains one of our strongest advantages as we continue providing personalized services without forcing you into a one-size-fits-all solution. Our experience is well known; however, we are not locked into current policies and procedures that may have been developed for other clients.

### *VI.A.2.I.a.2.a Operations Requirements [RFP V.E.1]*

**REQUIREMENT: RFP Section V.E.1**

The M&O Phase begins immediately after implementation of the MDR solution, when production is underway and all MDR business functions are operational. Vendor will provide technical support and limited operational support relative to dispute management and resolution from Go-Live through completion of the contract, as determined in the final contract.

Operational planning is an essential mechanism for managing the M&O phase of the contracts. The operational planning process needs to be established early in the DDI Phase to guide the right configuration and implementation strategy for the system. Operational planning needs to consider some important considerations such as:

a. Maximizing system availability to meet the operational requirements. This leads to a focus on designing reliability and maintainability of the system and resources in use.

b. Preserving system operating potential through proper planning of system scheduled maintenance. This warrants a reliability-centered maintenance strategy that incorporates preventive maintenance to preempt failures and address security issues, thereby extending the mean time between corrective maintenance, as well as enhancing the availability of the system.

c. Harnessing IT technology for maintenance management. This requires systematic capturing and tracking of operating and maintenance data to facilitate analysis planning and forecasting.

DHHS requires that all agreed maintenance planning artifacts be developed early in the DDI Phase to ensure that the operational needs are clearly understood and are incorporated into the decisions and choices in the final specifications of the MDR solution. Similarly plans such as transition plans need to be documented during the DDI phase to ensure a measurable way to monitor and manage operational readiness.

***Nebraska will benefit from Conduent's CMdS solution that meets Federal certification, performance standards and MITA guidelines to support efficient and accurate operations.***

Conduent begins operational planning during the Design, Development, and Implementation (DDI) phase – not after implementation is complete. We design, configure, test, and deploy the CMdS Rebate Administration solution with long-term operations in mind, ensuring Nebraska transitions smoothly from implementation to production with documented processes, trained staff, established governance, and measurable operational readiness.

Our proven operational model supports Nebraska's four primary objectives:

1. Maximize system availability
2. Minimize operational risk
3. Simplify system maintenance
4. Continuously improve program performance

With more than 27 years of Medicaid Drug Rebate Program experience, Conduent has never missed a CMS-required rebate deadline. Our CMdS Rebate Administration solution combines proven technology with experienced Medicaid rebate professionals. These professionals remain engaged throughout implementation and operations to help Nebraska maintain a stable, compliant, and efficient rebate program.

## DHHS Considerations for Successful MDR Maintenance and Operations

**Conduent maximizes system availability** by designing the CMdS Rebate Administration solution for reliability, scalability, and continuous operations. The cloud-hosted, configurable platform integrates Federal, supplemental, and state rebate administration within a single application, reducing operational complexity and eliminating the need to maintain multiple systems. Automated rebate calculations, invoice generation, claim validation, reporting, and role-based security minimize manual intervention while supporting consistent system performance. Comprehensive operational monitoring and experienced Medicaid rebate

specialists help identify and resolve issues quickly. ensuring Nebraska can maintain uninterrupted access to critical rebate processing and program management functions throughout the contract.

Nebraska will benefit from Conduent's **proactive, reliability-centered maintenance strategy** that preserves system performance while minimizing operational disruption. During the DDI phase, Conduent develops comprehensive maintenance, transition, and operational support plans that establish procedures for scheduled maintenance, configuration management, system updates, and change control. Preventive maintenance activities, routine security updates, and continuous performance monitoring reduce the likelihood of unexpected failures, strengthen system security, and extend the time between corrective maintenance activities. By coordinating planned maintenance with Nebraska DHHS and following disciplined operational procedures, Conduent maintains high system availability while ensuring continued compliance with evolving CMS and security requirements.

**Our solution harnesses the most effective technologies** for integrated reporting, analytics, and operational monitoring capabilities to support data-driven maintenance management and continuous improvement. The solution captures operational and financial data throughout the rebate lifecycle. We provide more than 50 standard reports covering invoice processing, manufacturer payments, disputes, accounts receivable, outstanding balances, and other key performance indicators. Nebraska can use this information to monitor operational trends, identify emerging issues, forecast workload, support maintenance planning, and make informed operational decisions. Conduent supplements these capabilities with ongoing performance analysis and additional reporting as business needs evolve, ensuring the State has timely, actionable information to optimize system performance and program operations.

## DHHS Will Benefit from Conduent's MDR Solution

Early planning allows Nebraska to validate operational readiness before Go-Live while reducing transition risk. Conduent develops all operational planning artifacts during the DDI phase so operational requirements drive implementation decisions rather than becoming post-implementation activities.

Working collaboratively with DHHS, Conduent develops and maintains:

- Operations and Maintenance Plan
- Transition Plan
- Operational Readiness Plan
- Maintenance Schedule
- Support Procedures
- Knowledge Transfer Plan
- Service Management Procedures
- Governance and Escalation Procedures

By establishing these artifacts early, Nebraska enters production with defined processes, trained personnel, and clear operational accountability.

### *Maximize System Availability*

Conduent designs the CMdS Rebate Administration solution to support continuous operations while minimizing manual effort and system interruptions.

The solution improves availability by:

- Operating as a single, integrated rebate administration platform
- Automating rebate calculations, invoice generation, validations, and reporting
- Providing role-based security and controlled user access
- Supporting Federal, supplemental, and state-only rebate programs within one application
- Delivering real-time operational visibility through comprehensive reporting and dashboards

These capabilities reduce manual processing, improve productivity, and allow Nebraska staff to focus on program oversight rather than system administration.

### *Manage Proactively*

Conduent uses a reliability-centered maintenance strategy that emphasizes prevention rather than correction. We coordinate scheduled maintenance with DHHS to minimize operational disruption while maintaining system performance and security.

Our maintenance approach includes:

- Preventive maintenance
- Routine application and security updates
- Continuous system monitoring
- Configuration management
- Controlled change management
- Performance monitoring and trend analysis

This proactive approach reduces downtime, extends system reliability, and supports consistent program operations throughout the contract.

### *Continuously Improve Operations*

Conduent continuously measures operational performance and provides Nebraska with the information needed to manage the Drug Rebate Program effectively.

The CMdS Rebate Administration solution includes more than **50 standard operational and financial reports.** Reports include invoices, payments, disputes, accounts receivable, manufacturer balances, interest calculations, excluded providers, and CMS reference data. Nebraska users can generate reports on demand, monitor operational trends, and identify opportunities to improve performance. Conduent also develops additional reports as business or CMS requirements evolve.

### *Provide Responsive Production Support*

Following Go-Live, Conduent provides ongoing technical support and operational assistance throughout the contract period. Our experienced Medicaid rebate specialists support dispute management, manufacturer communications, reporting, and day-to-day rebate operations while working closely with Nebraska staff to resolve issues quickly and maintain compliance.

Because Conduent supports Medicaid rebate programs every day, we identify issues early, communicate proactively, and resolve problems before they affect operations. Our integrated technology, experienced staff, and disciplined operational processes help Nebraska maximize rebate collections, reduce administrative effort, and sustain a highly available, compliant Medicaid Drug Rebate Program.

### *VI.A.2.I.a.2.a.1 Operations, Maintenance, and Configuration [RFP V.E.1.a]*

**REQUIREMENT: RFP Section V.E.1.a**

Contractors shall provide Technical and Dispute Management and Resolution Operations support, Maintenance, and ongoing Configuration of the MDR solution throughout the life of the contract. This includes providing Operations support as well as providing Maintenance and Enhancements to the solutions provided. Contractors will follow project management, requirements management, and system development processes throughout the life of the contract.

***As one of the few companies focused on solutions and services for the public sector industry, Conduent brings unparalleled experience. We provide a superior understanding of and capability to navigate the challenges associated with government benefits and services delivery. Nebraska will get unmatched Medicaid expertise from Conduent key personnel, critical to accurate and effective Resolution Management Support.***

## Technical and Dispute Management, Operations Support, Maintenance, and CMdS Rebate Administration Configuration

Nebraska DHHS requires ongoing operational support that keeps the CMdS Rebate Administration solution reliable, secure, and responsive. Our solution will help the State resolve manufacturer disputes, maximize rebate collections, and adapt to changing CMS and State requirements. Conduent provides comprehensive technical, operational, maintenance, configuration, and dispute management services throughout the contract. Our solution remains compliant, available, and aligned with Nebraska's evolving business needs. Our experienced Medicaid Drug Rebate specialists combine deep rebate expertise with disciplined operational management to support day-to-day operations and continuous improvement.

### *Technical and Operational Support*

Following Go-Live, Conduent transitions seamlessly into ongoing operations. Experienced technical and operational staff monitor production performance, interfaces, scheduled processing, application availability, data exchanges, and security events. Our team investigates operational issues, coordinates corrective actions, manages production incidents, supports end users, and tracks issues through resolution to minimize disruption to rebate operations.

Routine operational reporting and status reviews provide Nebraska DHHS with visibility into system performance, production processing, outstanding issues, and operational priorities. Preventive maintenance, security updates, routine monitoring, and performance optimization preserve system reliability while maintaining compliance with CMS requirements and industry security standards.

## *Dispute Management and Resolution*

Conduent works with Nebraska DHHS to establish dispute priorities, aging thresholds, escalation procedures, and resolution timelines. These parameters reflect the Department's business objectives and operational goals. Rather than applying a standard methodology, we tailor dispute prioritization to Nebraska's policies and operational needs while focusing resources on the disputes with the greatest financial impact.

The CMdS Rebate Administration solution records each manufacturer dispute and assigns it to an experienced rebate technician responsible for the affected rebate program. Maintaining technician ownership throughout the dispute lifecycle provides continuity, preserves program knowledge, and fosters productive working relationships with manufacturer representatives.

The solution captures manufacturer adjustment and dispute codes exactly as submitted on ROSI and PQAS payment documents. Our solution maintains complete dispute histories, including ownership, status, aging, correspondence, notes, and resolution activity. The solution links disputes directly to claims, invoices, payments, and accounts receivable, providing complete visibility throughout the resolution process.

Conduent works directly with manufacturers to verify invoiced amounts and resolve prior-period adjustments. Our team also provides the claim-level detail needed to validate invoiced units. When CMS Unit Rebate Amounts (URAs) remain unmatched for more than two quarters, Conduent follows established procedures for contacting manufacturers and facilitating timely resolution.

Conduent resolves disputes through established business processes that include:

- Claims payment adjustments that reduce disputed units
- Drug rebate data corrections when erroneous units are identified
- Manufacturer payments that satisfy outstanding disputed balances

The CMdS solution automatically tracks each resolution activity and immediately updates Accounts Receivable, ensuring reports accurately reflect current financial status.

Integrated dispute reports provide multiple views of dispute inventories, enabling Nebraska to prioritize activities based on aging, financial exposure, operational priorities, and Department policy. These reports include Outstanding Balance, Disputed Amounts, Dispute Activity, and Dispute Recapitulation.

## *Maintenance, Enhancements, and Configuration*

Conduent performs ongoing corrective, preventive, adaptive, and enhancement maintenance throughout the contract. These activities keep the CMdS Rebate Administration solution current with CMS guidance, manufacturer requirements, regulatory mandates, and Nebraska business policies.

Our configurable, cloud-hosted solution supports Federal, Supplemental, and State rebate programs. We support these programs within a single application. Authorized staff can update business rules, workflows, correspondence, reports, roles, and operating parameters without disrupting day-to-day operations. When software enhancements or custom development are required, Conduent follows disciplined impact assessment and configuration management practices. We complete testing, documentation, and approval activities before deployment.

## *Governance and Controlled Change*

Conduent applies structured project management, requirements management, and system development practices throughout contract performance, not only during implementation. Proposed operational improvements, regulatory changes, configuration updates, and enhancement requests follow established governance processes. Governance processes include requirements definition, impact analysis, and DHHS review and prioritization. They also include development or configuration, testing, defect resolution, documentation updates, release planning, deployment, and post-implementation verification.

Our approach allows Nebraska DHHS to implement new functionality, respond quickly to regulatory and business changes, and continuously improve the Medicaid Drug Rebate Program. Conduent's solution will support Nebraska DHHS while maintaining system stability, operational continuity, and compliance.

### *VI.A.2.I.a.2.a.2 Maintenance and System Enhancements [RFP V.E.1.b]*

**REQUIREMENT: RFP Section V.E.1.b**

There are two distinct classifications of work that vendor will perform: maintenance and system enhancements.

i. Maintenance

DHHS defines maintenance for each module as follows:

a) Making configuration updates as requested by DHHS. Configuration includes but is not limited to changes to table values, parameters, codes, and business logic, including hardcoded business logic.

b) Correcting deficiencies (defects) found in the solutions based on detailed requirements described in the requirements attachments, Configuration documents and published design specifications.

c) Correcting deficiencies (defects) found in the solutions based on a failure to meet the detailed requirements in completed enhancement, configuration or maintenance requests.

d) Correcting deficiencies (defects) found in the solution by DHHS staff or any other state utilizing the solution.

e) Conducting research requested by DHHS or required to support the Department. For example:

1) System behavior and results

2) New healthcare initiatives

3) Best practices research across states and industry

4) Impacts of new state and federal legislation

5) Auditor requirements and corrective action plan implementation from audit findings

f) Performing regular maintenance as needed by DHHS required to support DHHS Programs. Examples of maintenance include but are not limited to:

1) Performance optimization.

2) Database management.

3) Software, hardware, and tools (e.g., patches, upgrades, and replacement).

4) Interface, report, and correspondence changes.

5) Making corrections or changes to maintain the integrity of the system or the data within it (e.g., backing out changes, correcting duplicate records, cleansing corrupt data, adding security measures, adding redundancy).

g) Using appropriate testing, configuration, and change control procedures and be able to provide necessary related reporting/documentation.

h) Updating system, user, and training documentation and online help to reflect changes that have been made to a solution.

i) Performing the activities above to maintain customizations implemented as part of an approved enhancement.

j) Perform incremental integration services via configuration. Incremental integration services required during the DDI phase should be included in the DDI costs.

k) Solution will incorporate any federal mandated changes to the drug rebate program.

If incremental changes are included in existing requirements, are the result of bugs, operational support, user maintenance, batch cycles, and support of existing code or can be completed with the maintenance resources within the scope and schedule of the maintenance team, the change will fall under the definition of maintenance. If the change requires system development and testing efforts beyond the capacity or skill level of the maintenance team and are not part of the original requirements, the change will fall under the definition of enhancement as mutually agreed upon between the vendor and DHHS.

All maintenance activities will be performed at no additional cost to the state in the Bidder's response. Vendor will be required, at no additional cost, to add resources necessary to complete all activities by the required due date.

ii. System Enhancements DHHS defines systems enhancements as follows:

a) System enhancements exclude any activities defined in "Maintenance" above.

b) New features or functionality that fall outside the scope of all RFP requirements, bidder's RFP response, the contracts, or agreements of any supplemental negotiations.

DHHS must approve both the design and level of effort prior to the start of development or configuration for system enhancements via the change control process. DHHS must approve any changes to the design or level of effort that occur after the original approval. The level of effort billed cannot exceed the level of effort approved by DHHS and must comply with the rates defined in the Cost Sheet.

Vendor must provide an estimate of any impact on annual operations costs, for the enhancement during the M&O phase of the contracts if applicable. Reimbursements for any additional operations costs must be addressed in a contract amendment.

***Conduent's approach addresses the full solution, integrating technology, people, and processes to strengthen rebate program operations. Proposed system enhancements will be presented to DHHS for approval, with a focus on modernization, program improvements, and clear business benefits.***

## Maintenance and System Enhancements

In support of maintenance and enhancements, Conduent will perform two distinct classifications of work, maintenance and system enhancements.

Table VI.A.2.I.a.2-3 represents the classification, and Conduent's contractual commitment

**Table VI.A.2.I.a.2-3. Maintenance and System Enhancements**

| Classification | |
|---|---|
| **i. Maintenance: DHHS defines maintenance for each module as follows:** | |
| Configuration Updates (a) | On request by DHHS |
| Correcting Deficiencies (b-d) | As defined in contract requirements |
| Conducting Research (e 1-5) | On request by DHHS or in support of contract requirements |
| Performing Regular Maintenance (f 1-5) | As needed by DHHS and in support of DHHS Programs |
| Using appropriate testing, configuration, and change control procedures (g) | Providing necessary related reporting/documentation |
| Updating system, user, and training documentation and online help (h) | Supporting changes that have been made to solution |
| Perform activities to maintain customizations (i) | All approved enhancements will be supported |
| Perform incremental integration services via configuration (j) | Incremental integration services during DDI will be included in DDI costs |
| Incorporate federal mandated changes (k) | As defined in contract requirements |

| Classification | |
|---|---|
| **ii. System Enhancements DHHS defines systems enhancements as follows:** | |
| System enhancements exclude any activities defined in "Maintenance" above (a) | Maintenance activities will be performed at no additional cost |
| New features or functionality that fall outside the scope of all RFP requirements, bidder's RFP response, the contracts, or agreements of any supplemental negotiations. (b) | Per RFP requirements, enhancements for new features or functionality outside the scope during the duration of the contract will adhere to the State's change request process.<br>Upon request by the State, Conduent will provide a written scope of work; this includes the technical and/or business requirement changes, the schedule, and the costs associated with the system enhancement, for the state's consideration of approval. Once approved and after the system enhancement has been delivered, Conduent will submit a written request for deliverable acceptance of the system enhancement and obtain state approval prior to billing the system enhancement. |

If incremental changes are included in existing requirements, are the result of bugs, operational support, user maintenance, batch cycles, and support of existing code or can be completed with the maintenance resources. This can be accomplished within the scope and schedule of the maintenance team. The change will fall under the definition of maintenance. If the change requires system development and testing efforts beyond the capacity or skill level of the maintenance team and are not part of the original requirements, the change will fall under the definition of enhancement. This will be mutually agreed upon between Conduent and DHHS.

## i. Maintenance Activities

All maintenance activities will be performed at no additional cost to the state. Conduent, at no additional cost, will add resources necessary to complete all activities by the required due date.

We understand that DHHS must approve the design and level of effort prior to the start of development or configuration for system enhancements via the change control process. Conduent will first request approval of changes to the design or level of effort that occur after the original approval. The level of effort billed cannot exceed the level of effort approved by DHHS and will comply with the rates defined in the Cost Sheet.

Conduent will provide an estimate of any impact on annual operations costs, for the enhancement during the M&O phase of the contracts if applicable. Reimbursements for any additional operations costs must be addressed in a contract amendment.

Conduent fully supports Nebraska DHHS's definition of maintenance and will perform all maintenance activities required under the contract at no additional cost to the State. Our maintenance approach combines a configurable, cloud-hosted CMdS Rebate Administration solution with disciplined operational processes and experienced Medicaid rebate professionals to keep Nebraska's Medicaid Drug Rebate Program reliable, secure, compliant, and operating at peak performance throughout the contract.

Unlike solutions that rely heavily on custom programming, the CMdS Rebate Administration solution uses configurable business rules, automated workflows, integrated validation, and centralized administration to simplify ongoing maintenance while reducing operational risk. Supported by more than 27 years of Medicaid Drug Rebate Program experience, our Rebate

solution empowers us to collect 99% of all rebates invoiced. As an industry leader, our rebate team's operational expertise maximizes rebates by talking to clients daily and providing the right information to the right person at the right time. We never keep any of the money we collect. We turn over 100% to you. Conduent has never missed a CMS-required rebate deadline. Nebraska benefits from this proven operational experience, mature maintenance processes, and continuous product improvements developed across multiple Medicaid programs.

### *a) Making Configuration Updates as Requested by DHHS*

We implement approved configuration changes through established configuration management and change control procedures. The CMdS Rebate Administration solution supports configurable business rules, table values, security roles, workflow parameters, rebate program settings, and operational controls, enabling Nebraska to respond quickly to changing business and regulatory requirements without unnecessary software customization. Every requested change includes impact analysis, configuration, testing, documentation, and controlled deployment to maintain production stability while minimizing implementation time and operational disruption.

### *b) Correcting Deficiencies Identified Against Solution Requirements*

Conduent investigates, prioritizes, corrects, tests, documents, and deploys defect corrections using disciplined software development lifecycle, quality assurance, and release management processes. The CMdS Rebate Administration solution performs automated claim validations, invoice audits, unit conversions, and business rule verification that identify many issues before they affect production, improving system quality while reducing operational risk and manufacturer disputes.

### *c) Correcting Deficiencies Resulting from Enhancements, Configuration Changes, or Maintenance*

We manage all maintenance-related defects through a structured issue management process that includes root cause analysis, impact assessment, testing, documentation, and controlled implementation. Each correction follows established project management, requirements management, quality assurance, and change control procedures to ensure production stability while preserving system integrity and regulatory compliance.

### *d) Correcting Deficiencies Identified by DHHS or Other States*

Nebraska benefits from Conduent's experience supporting Medicaid pharmacy and drug rebate programs across multiple states. When Nebraska or another client identifies an operational improvement or software correction, Conduent evaluates the enhancement for broader applicability. The enhancement incorporates approved improvements into the core solution through controlled maintenance releases. This continuous improvement model allows Nebraska to benefit from proven best practices and operational lessons learned across multiple Medicaid programs while maintaining a stable, fully tested production environment.

### *e) Conducting Research Requested by DHHS*

Conduent's Medicaid rebate specialists continuously monitor CMS guidance, manufacturer activity, rebate policy changes, market trends, new drug introductions, patent expirations, clinical studies, and legislative developments affecting Medicaid pharmacy programs. We provide Nebraska with timely research and operational guidance supporting system behavior, regulatory compliance, audit responses, financial analysis, program enhancements, and emerging healthcare initiatives. Because Conduent supports multiple Medicaid agencies, Nebraska benefits from current industry knowledge, practical implementation experience, and proven best practices rather than theoretical recommendations.

### *f) Performing Routine Maintenance*

We perform routine maintenance necessary to preserve system performance, security, availability, and data integrity throughout the contract. Routine activities include application updates, security enhancements, database support, interface maintenance, report updates, performance optimization, operational monitoring, and data integrity activities. Our preventive maintenance strategy minimizes unexpected outages, extends system reliability, and maintains uninterrupted rebate operations while reducing long-term maintenance costs.

### *g) Testing, Configuration, and Change Control*

Every maintenance activity follows documented project management, requirements management, testing, quality assurance, configuration management, and change control processes. Configuration changes undergo comprehensive validation before deployment and include complete documentation, traceability, and approval records. This disciplined governance minimizes implementation risk while protecting Nebraska's production environment and maintaining regulatory compliance.

### *h) Updating Documentation*

Conduent updates system documentation, operational procedures, user guides, training materials, and online help whenever approved maintenance activities affect system functionality or business processes. Maintaining current documentation supports effective knowledge transfer, operational continuity, user adoption, and long-term system support.

### *i) Maintaining Approved Customizations*

We maintain all approved Nebraska-specific configurations and customizations using the same disciplined maintenance, testing, documentation, and release management processes applied to the core CMdS Rebate Administration solution. This approach protects Nebraska's investment while ensuring compatibility with future regulatory updates and product enhancements.

### *j) Incremental Integration Services*

During implementation and throughout ongoing operations, Conduent supports incremental integration services through configurable interfaces and standardized integration processes.

The CMdS Rebate Administration solution's single-platform architecture simplifies interface management, reduces maintenance complexity, and improves long-term operational reliability compared with environments requiring multiple disconnected applications.

### *k) Incorporating Federal Drug Rebate Program Changes*

Conduent continuously monitors CMS guidance and federal Medicaid Drug Rebate Program requirements to ensure Nebraska remains compliant with changing regulations. Required federal changes are incorporated through disciplined configuration management, comprehensive testing, and controlled deployment processes that minimize operational disruption while maintaining uninterrupted rebate operations. Conduent's 27 years of Medicaid rebate experience and record of never missing a CMS-required rebate deadline provide Nebraska with confidence that regulatory changes will be implemented accurately and on time.

## ii. System Enhancements

Conduent fully supports Nebraska's definition of system enhancements and clearly distinguishes enhancements from routine maintenance activities. Enhancements introduce new capabilities beyond the contracted scope and are managed through a structured governance process that provides Nebraska with complete visibility into business objectives, solution design, implementation approach, schedule, level of effort, operational impacts, and ongoing maintenance costs before development begins.

### *a) System Enhancements*

We manage all enhancement requests through disciplined project management, business analysis, requirements management, solution architecture, system development, testing, quality assurance, and change control processes. Working collaboratively with Nebraska DHHS, Conduent validates business requirements, develops detailed solution designs, estimates level of effort, evaluates operational and financial impacts, and obtains State approval before beginning development. Throughout implementation, Nebraska receives regular project status updates, complete documentation, testing results, and implementation planning that support informed decision-making and successful deployment.

### *b) New Features*

Our configurable CMdS Rebate Administration solution reduces the number of enhancements requiring custom software development because many business changes can be implemented through configuration rather than programming. When development is required, Conduent follows proven governance processes that protect production stability while delivering high-quality enhancements that integrate seamlessly with the existing solution. Nebraska benefits from lower implementation risk, greater cost predictability, faster delivery, and a solution that continues to evolve with changing business priorities, CMS requirements, and industry best practices.

# VI.A.2.I.b CMS Certification Requirements [RFP V.G.1]

**REQUIREMENT: RFP Section V.G.1**

CMS Certification Requirements

The vendor shall perform each of the following tasks as indicated in a. through e. below. **In its RFP's response, the Bidder shall describe in detail, how it will meet each requirement listed under each category (a. to e.) in this section, to meet the CMS certification requirements and achieve the CMS certification for the system. Response for each requirement shall include clear descriptions.**

***With Conduent, you have a long-term, low-risk, high-reward partner. For more than five decades, we have directly supported state Medicaid and Government Health programs.***

Nebraska DHHS needs certification activities integrated into every stage of the MDR implementation so requirements, evidence, testing, readiness, and metrics remain aligned through certification and ongoing operations.

Conduent brings extensive Medicaid certification experience and applies that experience to Nebraska's required Streamlined Modular Certification process. Our team has also supported earlier CMS certification models, including Outcomes-Based Certification and the Medicaid Enterprise Certification Toolkit, giving us perspective on how CMS expectations have evolved and how to carry forward proven practices in traceability, evidence development, readiness, and review preparation.

**Conduent: Experienced and Reliable CMS Certification Partner**

- 100% success rate of working in partnership with CMS and our clients to achieve CMS certification for Conduent solutions
- [redacted]
- Experienced achieving all CMS certification using multiple methodologies:
  - Streamlined Modular Certifications (SMC)
  - Outcomes Based Certification (OBC) guidelines
  - Medicaid Enterprise Certification Toolkit (MECT)

Our Certification Manager coordinates with DHHS, CMS, project teams, and participating vendors to keep certification activities aligned with the implementation schedule, current CMS guidance, and Nebraska's governance processes. Working with DHHS, we also define State-specific outcomes and measurable results that reflect Nebraska's rebate priorities, such as efficient invoice processing, timely dispute resolution, accurate collections and reconciliation, reduced manual effort, improved labeler access, and reliable reporting.

At a high level, our certification support includes:

- Establishing and maintaining the certification plan, schedule, roles, and governance
- Mapping CMS-required and Nebraska-specific outcomes and metrics to MDR requirements and business processes
- Managing traceability across requirements, configuration, testing, outcomes, metrics, and certification evidence
- Coordinating required artifacts, documentation, crosswalks, and presentation materials
- Identifying and resolving certification gaps, findings, and remediation items

- Preparing for and supporting Pre-Operational Readiness Review, Operational Readiness Review, and Certification Review activities
- Supporting disaster recovery, security, testing, and other evidence needed for certification
- Producing and maintaining required operational metrics and reporting after go-live

This lifecycle approach helps Nebraska demonstrate compliance with applicable Conditions for Enhanced Funding while showing measurable improvements in Medicaid drug rebate administration. Detailed descriptions of how Conduent satisfies requirements a. through e. are provided in the following sections.

### VI.A.2.I.b.1 General [RFP V.G.1.a]

**REQUIREMENT: RFP Section V.G.1.a**

a. General – Vendor shall complete all requirements listed herein:

i. Update system, user, and training documentation as necessary to support the certification process and to reflect changes that have been made to the solution resulting from the certification process following the approved change control process.

ii. Provide appropriate staff resources to support current CMS Certification, ORR (Operational Readiness Review), CR (Certification Review) and certification activities including participating in planning activities, meetings and other activities as required by the State and CMS.

iii. Participate and support in CMS certifications of other DHHS modules if needed. Such participation shall be limited to modules that interact with the vendors solution.

iv. Manage final approved evidence and artifacts, and populate the designated certification document repository as instructed by DHHS.

v. Assist DHHS in the preparation of certification artifacts, evidence and presentation materials as directed and in coordination with such other organizations as directed by DHHS, e.g., requirements/user stories and/or use cases for functional and non-functional requirements, data, business, capacity/performance, security/privacy/HIPAA compliance, usability, maintainability, interface, 508 compliance, disaster recovery, TMSIS, traceability to test plans or test cases.

vi. Correct all required remediation activities related to certification findings on a schedule to be approved by CMS and DHHS.

vii. Present at milestone reviews and other certification meetings as directed by DHHS.

viii. Ensure that any required certification artifacts or evidence maintained by Vendor's subcontractors or vendors is made available timely as requested by DHHS and CMS.

ix. Ensure CMS system certification through correct design, implementation, documentation and adherence to all CMS certification guidelines.

x. Comply with all requirements in the most current CMS certification guidelines as interpreted by DHHS.

xi. Provide all required artifacts and comply with all requirements as defined in the most current CMS Streamlined Modular Certification guidelines.

***From planning to certification, Conduent provides the leadership, tools, and expertise needed to deliver a compliant, operationally ready MDR solution. Based on decades of experience, we provide a superior understanding of and capability to navigate the challenges associated with certification.***

## a. General

Federal certification is essential to MDR success. It confirms compliance with CMS requirements and supports the State's ability to secure and maintain enhanced federal funding. Our approach integrates certification activities throughout the solution lifecycle through coordinated governance, controlled documentation, operational readiness, testing traceability, and compliance oversight. This keeps certification requirements connected to project execution and supports both initial CMS certification and continued compliance with applicable federal requirements.

We partner closely with DHHS, CMS, and other modular vendors. Together, we align certification activities and support certification readiness. We confirm that all required evidence, artifacts, and supporting documentation are complete, accurate, and available in accordance with CMS and State requirements. Our team is experienced supporting CMS certification efforts, Operational Readiness Reviews (ORRs), Certification Reviews (CRs), and other Streamlined Modular Certification (SMC) activities. We provide the skilled resources, processes, and tools necessary to support all phases of certification.

Our team maintains certification repositories and manages certification artifacts and evidence. We support presentation development and milestone reviews, coordinate subcontractor deliverables, and assist with remediation activities resulting from certification findings. Through disciplined change management and comprehensive documentation updates, we validate the solution remains certification-ready and compliant. We also maintain alignment with current CMS certification guidelines, DHHS direction, and State certification objectives.

### *i. System, User, and Training Documentation Updates*

i. Update system, user, and training documentation as necessary to support the certification process and to reflect changes that have been made to the solution resulting from the certification process following the approved change control process.

Conduent maintains system, user, and training documentation through established change management, configuration management, and certification support processes. Throughout the certification lifecycle, documentation is reviewed and updated to incorporate certification findings, corrective actions, approved enhancements, and other resulting changes, ensuring alignment with the current solution state.

When certification activities result in approved changes to system functionality, business processes, interfaces, security controls, operational procedures, or user workflows, Conduent updates the appropriate system documentation. This may include architecture and design documents, configuration records, interface documentation, operational procedures, security documentation, and other technical artifacts. Updates are coordinated with relevant technical and business stakeholders to ensure accuracy and completeness.

User-facing documentation is also reviewed and revised when certification-related changes affect system use. User guides, standard operating procedures, job aids, online help, and related reference materials are updated to reflect revised functionality, processes, or business rules, providing users with current guidance.

Training materials are reviewed and updated as necessary to address certification-related changes. Training guides, presentations, demonstrations, and other learning resources are revised to reflect new functionality, updated workflows, operational changes, and modified procedures. When required, Conduent supports training for impacted users, administrators, and operational staff.

All documentation updates resulting from certification activities are managed through the approved change control process. Changes are linked to approved change requests and follow established review, approval, version control, and release procedures. This ensures traceability between certification requirements, approved solution changes, and documentation updates

while maintaining records of revisions and approvals. Through these practices, Conduent keeps system, user, and training documentation current and aligned with the certified solution configuration.

### *ii. Staff Resources to Support CMS Certification and ORR Efforts*

ii. Provide appropriate staff resources to support current CMS Certification, ORR (Operational Readiness Review), CR (Certification Review) and certification activities including participating in planning activities, meetings and other activities as required by the State and CMS.

Conduent provides qualified staff resources to support all phases of CMS certification activities, including planning, readiness assessments, artifact development, testing, ORRs, CRs, and issue resolution. Resources are aligned to the functional, technical, operational, and programmatic needs of each certification effort, ensuring certification activities are effectively supported while maintaining ongoing operational responsibilities.

Throughout the certification lifecycle, Conduent assigns experienced subject matter experts, project managers, architects, testers, operations staff, and security professionals who possess knowledge of the solution, business processes, system operations, certification requirements, and applicable federal and state standards.

Conduent actively participates in certification planning activities with the State and CMS, including schedule development, readiness reviews, resource planning, risk identification, review coordination, and action item management. Conduent collaborates with State representatives and stakeholders to prepare certification strategies, supporting documentation, and evidence required for certification reviews.

For ORRs and CRs, Conduent provides knowledgeable personnel to support walkthroughs, demonstrations, interviews, document reviews, and validation activities. Staff present system capabilities, operational processes, technical architecture, testing results, security controls, and other information requested by reviewers, while responding to questions and supporting readiness assessments.

Conduent also supports the preparation, review, and maintenance of certification artifacts and evidence submitted to the State and CMS. When findings or remediation activities are identified, appropriate resources are assigned to analyze issues, implement corrective actions, perform testing, and document results.

Throughout the certification process, Conduent participates in meetings, workshops, status reviews, planning sessions, and other activities required by the State and CMS. Resource assignments are monitored and adjusted as needed to support evolving certification schedules, review requirements, and project priorities, ensuring consistent support through planning, review, remediation, and final certification approval.

## *iii. Participation and Support in Certification of other DHHS Modules, as Needed*

iii. Participate and support in CMS certifications of other DHHS modules if needed. Such participation shall be limited to modules that interact with the vendors solution.

Conduent supports CMS certification activities for other DHHS modules when those modules interface with or depend on the Conduent solution. As requested by DHHS, Conduent provides subject matter expertise, interface documentation, testing support, certification evidence, and technical assistance related to integrated functions and data exchanges.

Conduent participates in planning activities, certification reviews, readiness assessments, demonstrations, and issue resolution efforts as needed to support certification requirements affecting interconnected solutions. Participation is limited to modules that interact with the Conduent solution and focuses on ensuring accurate representation of interfaces, dependencies, and operational readiness.

## *iv. Final Approved Evidence/Artifacts and Document Repository Management*

iv. Manage final approved evidence and artifacts, and populate the designated certification document repository as instructed by DHHS.

Conduent uses established document management, configuration management, and quality review processes to manage certification evidence and artifacts throughout the certification lifecycle. Certification deliverables are developed, reviewed, and maintained in a controlled environment where documents are subject to version control, change tracking, and formal approval procedures. As certification artifacts are created, Conduent coordinates with stakeholders to validate their accuracy. We verify alignment with system functionality, operational processes, testing results, security controls, and certification requirements. Each artifact undergoes appropriate reviews to verify completeness, accuracy, consistency, and alignment with applicable State and CMS certification standards before it is designated as a final deliverable.

Once artifacts have completed the required review and approval process, Conduent maintains them as controlled documents within its document management framework. Version histories, approval records, and supporting traceability information are retained to provide a clear audit trail linking certification requirements, approved system changes, and associated evidence. This approach supports transparency throughout the certification process and facilitates efficient retrieval of documentation when requested by DHHS, CMS, or other authorized stakeholders.

In accordance with DHHS guidance and established certification procedures, Conduent populates the designated certification document repository with final approved evidence and artifacts. Repository submissions are performed using the prescribed document structures, naming conventions, metadata requirements, and organizational standards provided by DHHS. Prior to submission, Conduent validates that artifacts represent the approved versions of record and that all required supporting documentation has been included.

Following repository population, Conduent verifies document placement, accessibility, and completeness within the designated repository to support certification reviews and stakeholder access. Repository contents are monitored throughout the certification effort, and updated

artifacts are submitted when approved changes, corrective actions, or additional certification requirements necessitate revisions. Conduent also maintains communication with DHHS certification stakeholders to address requests for clarification, supplemental evidence, or document updates and to keep repository contents aligned with current certification activities.

Through this disciplined approach, Conduent maintains accurate, traceable, and controlled certification documentation while providing DHHS reviewers and stakeholders with timely access to final approved evidence and artifacts required to support certification planning, review, validation, and approval activities.

### *v. Certification Artifacts, Evidence and Presentation Materials Preparation*

v. Assist DHHS in the preparation of certification artifacts, evidence and presentation materials as directed and in coordination with such other organizations as directed by DHHS, e.g., requirements/user stories and/or use cases for functional and non-functional requirements, data, business, capacity/performance, security/privacy/HIPAA compliance, usability, maintainability, interface, 508 compliance, disaster recovery, TMSIS, traceability to test plans or test cases.

Conduent works closely with DHHS and designated stakeholders to develop, organize, and maintain the documentation, supporting materials, and demonstrations needed for certification activities. The team translates program, operational, and technical objectives into clear documentation that reflects system capabilities, business processes, data flows, integration points, and operational readiness.

Our team prepares and maintains certification artifacts that describe application functionality, usability, maintainability, business workflows, data management processes, performance characteristics, interoperability, accessibility features, operational support processes, and disaster recovery capabilities. This includes developing and maintaining functional and non-functional requirements, user stories, use cases, process models, and architectural diagrams. We also prepare interface control documents (ICDs), data documentation, and security and privacy artifacts. The team develops Section 508 accessibility documentation, disaster recovery materials, and operational procedures that align with certification expectations.

We maintain end-to-end traceability across requirements, design, testing, and supporting evidence. This allows reviewers to connect documented capabilities with validation results. In preparation for certification reviews, our team develops presentation materials, demonstration scripts, briefing decks, and supporting exhibits, and coordinates contributions from participating organizations to present a comprehensive and accurate representation of system readiness and compliance.

To support review activities, we collect, validate, and organize evidence from project teams, vendors, and business partners. The team analyzes documentation and system outputs, identifies gaps, coordinates updates, and assembles supporting materials that demonstrate compliance with applicable program, technical, and regulatory standards, including privacy, HIPAA, accessibility, and reporting requirements (e.g., TMSIS).

## *vi. Correction of Certification Remediation Activities*

vi. Correct all required remediation activities related to certification findings on a schedule to be approved by CMS and DHHS.

Conduent works with DHHS to analyze review findings, develop corrective action plans, and implement updates that address certification findings across business, technical, operational, security, accessibility, and reporting areas. The team coordinates remediation activities with project stakeholders, tracks progress against approved milestones and provides regular status updates and supporting documentation.

Conduent validates completed actions through testing, documentation reviews, and evidence collection. We update supporting artifacts to reflect implemented changes. The team also prepares materials for follow-up reviews and demonstrates how corrective actions resolved identified issues, supporting DHHS throughout the resolution and approval process.

## *vii. Presentations at Milestone Reviews and other Certification Meetings*

vii. Present at milestone reviews and other certification meetings as directed by DHHS.

At the direction of DHHS, Conduent actively participates in milestone reviews, certification workgroup sessions, planning meetings, readiness assessments, and other project governance activities associated with certification. We provide subject matter experts, project leadership, and technical staff as needed to support discussions, answer questions, present project status, review documentation and evidence, and address certification-related topics.

Our team collaborates with DHHS, CMS, vendors, and other stakeholders to review progress, discuss risks and issues, evaluate readiness for upcoming activities, and support decision-making throughout the certification lifecycle. We also prepare meeting materials, presentation content, status updates, and follow-up documentation to facilitate productive discussions and support successful review outcomes.

## *viii. Availability of Subcontractor Certification Artifacts or Evidence*

viii. Ensure that any required certification artifacts or evidence maintained by Vendor's subcontractors or vendors is made available timely as requested by DHHS and CMS.

Conduent coordinates with subcontractors, vendors, and other partner organizations to collect, maintain, and provide supporting documentation and evidence needed for certification activities. Our team establishes clear expectations for artifact management, monitors submission schedules, and works directly with responsible parties to obtain requested materials and address documentation gaps. We review and organize received artifacts, validate completeness, and deliver information to DHHS and CMS, upon request, in accordance with established review timelines. Our team also tracks evidence requests, facilitates communication among stakeholders, and supports follow-up inquiries to provide reviewers with access to accurate and current certification materials.

## *ix. Correct Design, Implementation, Documentation Promote CMS Certification*

ix. Ensure CMS system certification through correct design, implementation, documentation and adherence to all CMS certification guidelines.

We will collaborate with the State throughout the planning phase to confirm the Medicaid Drug Rebate (MDR) Solution architecture and associated documentation adequately reflect adherence to CMS Conditions and Standards (C&S). Conduent will support you achieve CMS certification by aligning our MDR Solution design, configuration processes, and documentation to RFP and SMC requirements. We trace and resolve RFP and SMC criteria identified as gaps throughout design and testing to help facilitate enhanced federal funding.

Conduent incorporates certification governance activities throughout the project lifecycle, including certification planning, readiness assessments, status reviews, and artifact management. We conduct validation activities to confirm system functionality, business processes, documentation, and testing results align with CMS certification requirements and outcomes. Our team supports certification reviews by maintaining traceability between requirements, design, testing, and evidence artifacts, while proactively addressing identified gaps and remediation activities. This structured approach supports certification readiness and demonstrates compliance with applicable CMS certification guidelines.

## *x. Compliance with the Most Current CMS Certification Guidelines*

x. Comply with all requirements in the most current CMS certification guidelines as interpreted by DHHS.

Conduent aligns its certification activities with applicable CMS certification standards and guidance and DHHS requirements. We incorporate certification requirements into project planning, system design, development, testing, documentation, and operational processes, and maintain artifacts that demonstrate compliance with program, technical, security, accessibility, and reporting expectations. Conduent works closely with your team to interpret and apply CMS certification criteria, monitor changes to certification guidance, assess impacts to project deliverables, and update processes and documentation as needed. The team also supports reviews, audits, and validation activities by providing traceable evidence, responding to inquiries, and addressing any identified gaps to maintain alignment with your certification expectations.

## *xi. Provide requisite artifacts and comply with most current CMS SMC Certification requirements*

xi. Provide all required artifacts and comply with all requirements as defined in the most current CMS Streamlined Modular Certification guidelines.

Conduent provides the artifacts and evidence applicable to Nebraska’s MDR module under the most current CMS Streamlined Modular Certification guidance and DHHS direction. Our Certification Manager works with you to confirm the required artifact inventory, submission schedule, repository structure, review process, and approval responsibilities early in the project.

Required materials are developed and maintained as part of the project rather than recreated at the end of implementation. They may include certification planning and governance materials, requirements and outcomes traceability, testing and security evidence, operational readiness documentation, data conversion results, MDR-specific demonstrations, metrics, and remediation records. Each artifact is reviewed for accuracy, completeness, consistency, and alignment with the deployed solution before submission.

We maintain traceability from CMS-required and Nebraska-specific outcomes to the supporting requirements, configuration, test results, operational evidence, and metrics. For this MDR implementation, evidence will demonstrate capabilities such as timely and accurate rebate processing, manufacturer invoicing, rebate tracking and reporting, dispute resolution, labeler self-service, and invoice quality controls.

As CMS guidance or DHHS interpretation changes, our team assesses the impact, updates affected artifacts and processes through approved change control, and addresses identified gaps. Final approved materials are submitted to the designated certification repository in accordance with your naming, versioning, metadata, and schedule requirements.

### VI.A.2.I.b.2 Pre-Operational Readiness Review [RFP V.G.1.b]

**REQUIREMENT: RFP Section V.G.1.b**

b. Pre-Operational Readiness Review

i. The Vendor shall develop, maintain and submit a Requirements Traceability Matrix (RTM) to show bi directional traceability with applicable business requirements and their realization throughout all project phases (e.g., requirements, design, testing and certification). This should include how the requirement is realized (e.g., configuration, custom development, base functionality). All revisions must be reviewed and approved by DHHS.

ii. The Vendor shall use State approved testing, configuration and change control procedures for all changes made to the solution resulting from the certification process.

iii. The Vendor's requirements management tool shall have the ability to manage requirements traceability by module(s), MITA business area, MITA business process and all applicable Certification Outcomes.

iv. The Vendor shall document any gaps between the initially configured solution and the business requirements in the requirements management tool. Gaps must show bi-directional traceability with applicable business requirement(s), design, test cases, test results, CMS Required Outcomes, State Specific Outcomes and Reporting Metrics.

v. The Vendor shall validate the functions of the system against the CMS Required Outcomes, State Specific Outcomes and Reporting Metrics.

vi. The Vendor shall provide a detailed Implementation Plan as defined by CMS SMC Required Artifacts.

vii. The Vendor shall develop a crosswalk for all requirements of the SMC Testing Guidance Framework, or most current CMS testing guidance, to demonstrate where each requirement is addressed.

viii. The Vendor shall develop a Certification Crosswalk that describes how the Vendor's deliverables and other documentation align with the Conditions for Enhanced Funding, CMS Required and State Specific Outcomes for the system/module.

ix. The Vendor shall develop CMS certification evidence and artifacts for each CMS and State Specific Outcome and Condition for Enhance Funding as required by CMS and DHHS and in accordance with DHHS schedule.

x. The Vendor shall include detailed certification tasks, milestones and deliverables in the project workplan as directed by DHHS.

xi. Data Management, Conversion and Migration Plan in line with CMS SMC certification requirements have been Developed, submitted, and maintained.

xii. The Vendor shall develop, submit and maintain a System Test Plan in line with CMS SMC certification requirements. The System Test plan must be informed by the CMS SMC Testing Guidance Framework or most current CMS testing guidance.

xiii. The Vendor shall develop, execute, maintain and deliver for DHHS's approval, a System Security Plan (SSP) that will document the current level of security controls within the module scope of work that protects the confidentiality, integrity and availability (CIA) of the solution and its information. This is a living document and will be updated no less than annually and when new vulnerabilities are identified and mitigated and when additional functionality and/or components are implemented. The System Security Plan must be approved before any State data is transferred or entered into the solution. DHHS must approve all revisions of the System Security Plan. If the Vendor's solution is hosted by DHHS, DHHS will provide supporting information to the Vendor to complete the SSP.

xiv. The SSP must address the following topics:

1) Adherence to DHHS's requirements outlined in the "Security and Privacy Controls Requirements" document, included in the Procurement Library;

2) Compliance with the Centers for Medicare and Medicaid Services (CMS) Acceptable Risk Safeguards (ARS) to assess CIA and NIST SP 800-53 Rev 4 at a "moderate" control level.

3) Data center physical security.

4) Network segmentation, access controls, and forensics.

5) Perimeter security.

6) Application security and data sensitivity classification, including Protected Health Information (PHI) and Personally Identifiable Information (PII).

7) End-point protections such as multiple redundant firewalls and host-based intrusion detection systems.

8) Identification and prevention of the use of prohibited functions, ports, protocols, and services.

9) Network, firewall, server and other security-related configurations and changes.

10) Intrusion detection and prevention.

11) Network scanning tools.

12) Host hardening.

13) Internet filtering.

14) Remote access.

15) Encryption of data at rest and in transit.

16) User authentication and directory services.

17) Interfaces and exchange of data with external entities.

18) System penetration testing.

19) Management of operating system and security patches.

20) Anti-Virus and malware detection and email gateways.

21) Assessment and testing of system and code modifications; and

22) Allowable internal and external communication protocols.

23) Compliance with the Federal Risk and Authorization Management Program (FedRAMP) Certification, FedRAMP Risk Assessment that indicates compliance or documented NIST 800-53 rev 4 at a “moderate” system risk assessment designation for Vendor hosted solutions.

24) Compliance with Statement on Standards for Attestation Engagements (SSAE-16) SOC 1 Type 2.

25) Compliance with Statement on Standards for Attestation Engagements (SSAE-16) SOC 2 Type 2.

c. Operational Readiness Review (ORR)

i. The Vendor shall develop Operational Readiness Review Checklists (ORR) that will examine the actual solution characteristics and the procedures of the product's operation to ensure that all hardware, software, resources, procedures, and user documentation accurately reflect the deployed state of the system.

ii. The Vendor's solution must comply with all vendor-applicable requirements outlined in CMS Conditions for Enhanced Funding 42 C.F.R. §433.112. The Vendor must conduct all activities and provide the necessary documentation and artifacts to evidence compliance with these conditions.

iii. The Vendor shall ensure that all system testing, specifically user acceptance testing, is completed in advance of Operational Readiness Review (ORR), allowing for timely collection and submission of comprehensive evidence and test reports to CMS.

d. Certification Review

i. The Vendor shall develop and submit all evidence, artifacts, and documents deemed necessary for certification by DHHS and CMS in accordance with DHHS’s schedule.

ii. The Vendor must create and execute a full disaster recovery test and submit the results of that test to DHHS in line with CMS certification timeline requirements.

e. Operations Metrics

i. The Vendor shall develop, produce, update and support initial and ongoing metrics reporting as defined by DHHS for submission to CMS on a schedule defined by DHHS. The Vendor shall provide continuous updates to certification reporting as required by CMS and DHHS.

***In alignment with our state partners, Conduent’s mission is to serve as a true steward of the public trust. Through documentation and accurate reporting, we consistently meet your goals.***

While system innovations and flexibility are a key part of our success, Conduent’s core strengths include preparation and collaboration. Our direct experience with Medicaid agencies across the U.S. enables us to anticipate and plan for contingencies to always fulfill our responsibilities to you.

Operational readiness and certification preparation is embedded throughout our implementation approach. We align project activities with CMS requirements from inception. We maintain traceability across requirements, design, testing, and certification activities while supporting DHHS through planning, validation, documentation, and review efforts.

Our team supports CMS certification by developing and maintaining the artifacts, evidence, crosswalks, and reporting deliverables required throughout the certification lifecycle. We validate solution functionality against required outcomes and performance metrics while applying approved change control, testing, and quality assurance processes to support compliance and readiness. Our team supports Operational Readiness Reviews (ORRs), Certification Reviews (CRs), and related certification activities, providing the documentation and evidence necessary to demonstrate system capabilities and compliance. We maintain security, testing, migration, implementation, and operational documentation and support ongoing certification reporting and performance metric activities to help sustain certification objectives and operational readiness. We have reviewed Attachment E and have aligned our solution and supporting documentation to satisfy these requirements.

## b. Pre-Operational Readiness Review

i. The Vendor shall develop, maintain and submit a Requirements Traceability Matrix (RTM) to show bidirectional traceability with applicable business requirements and their realization throughout all project phases (e.g., requirements, design, testing and certification). This should include how the requirement is realized (e.g., configuration, custom development, base functionality). All revisions must be reviewed and approved by DHHS.

Conduent develops and maintains a comprehensive Requirements Traceability Matrix (RTM) that provides end-to-end and bi-directional traceability of each requirement from initial definition through implementation, validation, and certification activities. The RTM serves as the central repository for tracking the lifecycle of business, functional, technical, interface, security, accessibility, and reporting requirements across all phases of the project.

To show fulfillment of CMS certification checklist items and outcomes, we use Microsoft [redacted] allows our team to create linkages between CMS metrics and outcomes, requirements documents, design documents, system configurations, and test cases/results. [redacted] also links to our [redacted] document repository for easy access to certification deliverables. We provide DHHS and appropriate stakeholders with access to these tools to demonstrate compliance with CMS requirements. The RTM is maintained in Microsoft [redacted] and exported into Excel on a weekly basis. Figure VI.A.2.I.a.2-2 illustrates how we load and trace RFP requirements in [redacted]



**Figure VI.A.2.I.a.2-2. [redacted] Shows Certification Requirement Traceability**
**[redacted]**

For each requirement, Conduent documents its source, associated design components, implementation approach, test scenarios, test results, certification artifacts, and related supporting evidence. The RTM identifies how each requirement is fulfilled, including whether the capability is delivered through base product functionality, system configuration, custom development, integration components, or a combination of approaches. This level of detail provides you with clear visibility into how project objectives are translated into operational system capabilities.

Conduent updates the RTM throughout the project lifecycle to reflect approved changes, design decisions, testing outcomes, and certification activities. The team conducts regular reviews to verify the accuracy and completeness of traceability relationships and to confirm alignment among requirements, solution design, development activities, testing, and certification documentation. All updates and revisions are submitted to you for review and approval. Our team incorporates your feedback, maintains version control and change history, and provides current RTM deliverables to support project oversight, readiness assessments, audits, and certification reviews.

### *ii. State-Approved Testing, Configuration Management, and Change Control Procedures*

ii. The Vendor shall use State approved testing, configuration and change control procedures for all changes made to the solution resulting from the certification process.

Conduent follows DHHS-approved testing, configuration management, and change control processes for all modifications implemented as a result of certification-related activities. We work collaboratively with your PMO during project planning to confirm we align with and document State processes.

### *Testing*

Conduent uses State-approved testing procedures for all changes. Our team develops and executes test plans, test cases, and validation activities to verify that approved changes function as intended, meet certification requirements, and do not adversely affect existing solution capabilities. Testing results are documented and reviewed as part of the certification and release processes.

### *Configuration*

Conduent maintains configuration control over application components, interfaces, documentation, and supporting artifacts. We record approved configurations in the project's change management repository. We apply State-approved configuration management procedures to control and track changes. Configuration items and associated documentation and software components are updated, versioned, and maintained in accordance with established configuration management practices, providing traceability between approved changes and the implemented solution.

### *Change Control*

Conduent manages all changes through the State-approved change control process. Our team evaluates proposed changes and prepares change request packages documenting change details and impacts. We obtain required approvals and manages each change through the established governance framework. Our team maintains records of approvals supported by testing outcomes, implementation activities, and associated documentation updates to support certification requirements and provide full traceability of changes made to the solution.

Throughout the change lifecycle, Conduent documents requirements, design updates, testing results, approvals, and implementation activities to provide a complete audit trail. We coordinate with you and other stakeholders to review proposed changes and communicate outcomes. After approval is obtained, we update project and certification documentation to reflect the approved modifications. This disciplined approach promotes consistency, traceability, and compliance across certification-related updates.

## ***Requirements Traceability Management and Certification Outcome Alignment***

iii. The Vendor's requirements management tool shall have the ability to manage requirements traceability by module(s), MITA business area, MITA business process and all applicable Certification Outcomes.

Conduent's requirements management tool, Microsoft [redacted], provides comprehensive traceability capabilities that link requirements throughout the solution lifecycle and support certification reporting and compliance activities. The requirements management tool supports traceability and reporting by module, MITA business area, MITA business process, CMS Required Outcome, State-Specific Outcome, Reporting Metric, and applicable Certification Outcomes, fully satisfying DHHS traceability management requirements.

The tool organizes requirements by system module, enabling project teams and your stakeholders to track the status and implementation of capabilities across the solution. It also maps requirements to applicable MITA business areas and MITA business processes, providing clear visibility into how solution functionality supports Medicaid business operations and program objectives.

In addition, the tool links requirements to applicable certification outcomes and supporting evidence, allowing stakeholders to trace each outcome to its corresponding requirements, design elements, implementation approach, testing activities, and validation results. These relationships support both forward and backward traceability, enabling users to identify the source of a requirement as well as all associated downstream artifacts. Conduent maintains these traceability relationships throughout requirements definition, design, configuration, development, testing, implementation, and certification activities. The tool's reporting capabilities provide you with visibility into requirement status, coverage, gaps, changes, and compliance alignment, supporting project oversight, audits, readiness reviews, and certification assessments.

## *Gap Analysis Documentation and Bi-Directional Traceability Management*

iv. The Vendor shall document any gaps between the initially configured solution and the business requirements in the requirements management tool. Gaps must show bi-directional traceability with applicable business requirement(s), design, test cases, test results, CMS Required Outcomes, State Specific Outcomes and Reporting Metrics.

Conduent documents variances identified between the configured solution and approved business requirements within the requirements management tool and manages them through a structured requirements and change management process. Each documented gap includes the detailed description, business impact, proposed resolution approach, status, ownership, and disposition to provide full visibility throughout analysis, design, implementation, testing, and certification activities.

The requirements management tool maintains bidirectional traceability between each identified gap and its related business requirements, solution design artifacts, configuration or development activities, test cases, test results, CMS Required Outcomes, State-Specific Outcomes, and applicable reporting metrics. This traceability enables stakeholders to track how a gap affects downstream project artifacts and to verify that corresponding updates are reflected across all related components. As gaps are analyzed and addressed, Conduent updates traceability relationships to reflect approved design decisions, implementation activities, validation results, and supporting certification evidence. The solution enables DHHS to monitor gaps, assess impacts, track resolutions, and maintain traceability among requirements, functionality, testing results, certification outcomes, and reporting metrics throughout the project lifecycle.

## *v. Validation of CMS Outcomes, State Outcomes, and Reporting Metrics*

v. The Vendor shall validate the functions of the system against the CMS Required Outcomes, State Specific Outcomes and Reporting Metrics.

We have reviewed Attachment E and have aligned our solution, testing, and supporting documentation to satisfy these requirements.

Conduent validates system functionality through a comprehensive verification and testing framework that aligns solution capabilities with CMS Required Outcomes, State-Specific Outcomes, and associated reporting metrics. Our team validates solution functionality against CMS Required Outcomes, State-Specific Outcomes, and all DHHS-defined Reporting Metrics through documented testing, outcome validation activities, reporting verification procedures, and certification reviews. Test cases and test results are included in the evidence packets that go to CMS.

Our team establishes traceability between requirements, design components, configuration and development activities, test scenarios, test cases, and outcome measures, providing a clear line of sight from business objectives to implemented functionality.

Conduent develops and executes functional, integration, system, user acceptance, accessibility, performance, security, and reporting tests that evaluate whether the solution supports the expected business processes and operational results. Test scenarios and validation activities measure the system's ability to meet outcome objectives and produce accurate, complete, and timely reporting data. We review test results, analyze defects and variances, and document corrective actions when needed. Conduent also validates reporting outputs and supporting data to confirm that required metrics accurately reflect system activity and business performance.

Throughout the validation process, the team maintains supporting evidence and traceability artifacts that demonstrate the relationship between implemented functionality, testing results, reporting measures, and applicable certification outcomes. This approach provides you with objective evidence that system capabilities align with program goals, certification expectations, and reporting requirements.

### *vi. CMS SMC-Compliant Implementation Planning and Delivery Framework*

vi. The Vendor shall provide a detailed Implementation Plan as defined by CMS SMC Required Artifacts.

Conduent develops and maintains a detailed Implementation Plan that aligns project activities, milestones, deliverables, and readiness objectives with CMS SMC requisite artifacts and your requirements. The plan defines the scope of implementation activities, project governance structure, resource assignments, dependencies, deployment approach, risk management activities, and key decision points needed to support successful system implementation and certification. It also documents the activities required for configuration, development, integration, data conversion, testing, training, operational readiness, deployment, and post-implementation support. The plan additionally includes schedules, milestones, acceptance criteria, and status tracking mechanisms that provide you with visibility into project progress and implementation readiness.

The team updates the Implementation Plan throughout the project lifecycle to reflect approved changes, emerging risks, completed activities, and revised timelines. We coordinate reviews with DHHS and project stakeholders, incorporates feedback, and maintains supporting documentation that demonstrates alignment between implementation activities, project objectives, and CMS certification expectations. Using this approach, Conduent provides a comprehensive roadmap for implementation activities and supporting artifacts, enabling DHHS to monitor progress, evaluate readiness, and track completion of key project and certification milestones.

## *vii. SMC Testing Guidance Framework Requirements Crosswalk*

vii. The Vendor shall develop a crosswalk for all requirements of the SMC Testing Guidance Framework, or most current CMS testing guidance, to demonstrate where each requirement is addressed.

Conduent develops and maintains a comprehensive crosswalk that maps each applicable requirement from the CMS SMC Testing Guidance Framework, and any other CMS-approved testing guidance, to the corresponding project artifacts, requirements, design documentation, test assets, and certification evidence. It serves as a centralized reference that demonstrates how each testing criterion is addressed within the solution and testing lifecycle. Conduent uses this mapping to identify coverage, validate alignment with testing expectations, and highlight any areas requiring additional documentation, testing, or remediation.

Conduent updates the crosswalk throughout design, testing, and certification activities to reflect approved changes, completed validation efforts, and newly developed evidence. The crosswalk supports reviews, audits, and certification assessments by providing DHHS and CMS with a clear view of where each testing requirement is addressed and the associated artifacts that demonstrate compliance and successful validation.

## *viii. Certification Crosswalk for Enhanced Funding and Outcome Alignment*

viii. The Vendor shall develop a Certification Crosswalk that describes how the Vendor's deliverables and other documentation align with the Conditions for Enhanced Funding, CMS Required and State Specific Outcomes for the system/module.

Conduent develops, maintains, and submits a Certification Crosswalk to DHHS that maps project deliverables, system documentation, testing artifacts, and supporting evidence to the applicable Conditions for Enhanced Funding, CMS Required Outcomes, and State-Specific Outcomes for the MDR solution. The crosswalk provides a clear, organized view of how project activities and deliverables support certification objectives and compliance requirements.

Conduent links each outcome and funding condition to the corresponding requirements, design documents, configuration or development components, test cases, test results, operational procedures, reporting artifacts, and other supporting documentation. This mapping allows you and CMS reviewers to readily identify the evidence that demonstrates compliance with each certification criterion.

The team updates the Crosswalk throughout the project lifecycle to reflect approved changes, completed deliverables, testing progress, and newly developed certification evidence. Conduent uses the crosswalk to identify coverage gaps, support readiness assessments, track certification progress, and provide a consolidated reference for audits and certification reviews. This approach gives you a transparent and traceable view of the relationship between project deliverables and applicable certification requirements.

## *ix. CMS Certification Evidence and Artifact Development*

ix. The Vendor shall develop CMS certification evidence and artifacts for each CMS and State Specific Outcome and Condition for Enhance Funding as required by CMS and DHHS and in accordance with DHHS schedule.

Conduent develops, maintains, submits, and updates certification artifacts and supporting evidence that demonstrate alignment with CMS Required Outcomes, State-Specific Outcomes, and Conditions for Enhanced Funding in accordance with CMS requirements, DHHS direction,

and approved project schedules. The team maps certification criteria to requirements, solution components, test results, operational procedures, reports, and other project deliverables to provide clear traceability between collected evidence, certification objectives and implemented capabilities.

Conduent collects, validates, and organizes documentation from project teams and stakeholders, and prepares certification packages, crosswalks, presentations, and supporting materials for your review. The team updates artifacts throughout the project lifecycle to reflect approved changes, completed testing activities, and operational readiness reviews. In accordance with DHHS-established timelines and CMS certification expectations, we submit required materials, e.g., operational metrics to show how our solution fulfills required outcomes. These metrics are discussed in further detail below under e. Operational Metrics.

## *x. Certification Tasks, Milestones, and Deliverables Planning*

x. The Vendor shall include detailed certification tasks, milestones and deliverables in the project work plan as directed by DHHS.

Conduent incorporates detailed certification activities, milestones, deliverables, dependencies, and review checkpoints into the Project Work Plan (PWP) in accordance with DHHS direction and CMS certification requirements. Certification activities include development of certification artifacts, requirements traceability validation, outcome validation, security reviews, Operational Readiness Review preparation, disaster recovery testing, certification evidence collection, DHHS review cycles, certification readiness assessments, and CMS submission support. The Project Work Plan identifies responsible resources, planned completion dates, predecessor and successor activities, project dependencies, milestone acceptance criteria, and certification deliverables. Conduent updates certification activities throughout the project lifecycle to reflect approved changes, project progress, and DHHS direction, providing DHHS with clear visibility into certification readiness and supporting proactive management of certification objectives.

## *xi. Data Management, Conversion, and Migration Planning for CMS Certification Compliance*

xi. Data Management, Conversion and Migration Plan in line with CMS SMC certification requirements have been Developed, submitted, and maintained.

Conduent develops and maintains a comprehensive Data Management, Conversion, and Migration Plan that aligns with CMS SMC certification requirements and supports your project objectives. The plan documents the approach for data assessment, data governance, source-to-target mapping, data cleansing, data conversion, migration activities, validation procedures, reconciliation processes, and post-conversion support.

Conduent works with you to identify data sources, define conversion requirements, establish data quality standards, and document business rules governing data transformation and migration activities. We develop detailed mapping specifications that describe how legacy data is transformed and loaded into the target solution, including any required data standardization, cleansing, or enrichment activities. We also prepare reports, dashboards, and supporting materials that demonstrate migration readiness. We conduct conversion testing, reconciliation activities, and data validation reviews to confirm that migrated data is complete, accurate, and

supports business operations and reporting requirements. We document the successful execution of data management and conversion activities for certification and implementation reviews.

Throughout the project lifecycle, Conduent updates the plan to reflect approved changes, conversion findings, testing results, and implementation decisions. Conduent submits the plan and related updates to DHHS for review and approval, maintains supporting documentation and evidence, and provides traceability between conversion activities, testing results, and certification artifacts.

## *xii. System Test Planning and CMS SMC Testing Guidance Compliance*

xii. The Vendor shall develop, submit and maintain a System Test Plan in line with CMS SMC certification requirements. The System Test plan must be informed by the CMS SMC Testing Guidance Framework or most current CMS testing guidance.

Conduent provides a System Test Plan that aligns with CMS SMC certification requirements and reflects the CMS SMC Testing Guidance Framework, or the most current CMS testing guidance. The plan establishes the testing methodology, scope, objectives, schedule, environments, resource assignments, entry and exit criteria, defect management processes, and reporting procedures used to evaluate system readiness.

The plan defines the approach for functional, integration, system, regression, performance, security, accessibility, data conversion, and end-to-end testing. Conduent additionally documents test data requirements, testing tools, environment configurations, risk-based testing considerations, and procedures for tracking, resolving, and retesting identified issues.

Conduent submits the System Test Plan and all subsequent revisions to DHHS for review and approval, incorporates approved changes, and maintains the System Test Plan as a living document throughout implementation, testing, and certification activities. The team updates the plan to reflect evolving requirements, testing results, project decisions, and certification activities, providing you with a current view of testing progress, solution quality, and readiness for implementation and certification review.

## *xiii. System Security Plan Development, Maintenance, and Approval*

xiii. The Vendor shall develop, execute, maintain and deliver for DHHS's approval, a System Security Plan (SSP) that will document the current level of security controls within the module scope of work that protects the confidentiality, integrity and availability (CIA) of the solution and its information. This is a living document and will be updated no less than annually and when new vulnerabilities are identified and mitigated and when additional functionality and/or components are implemented. The System Security Plan must be approved before any State data is transferred or entered into the solution. DHHS must approve all revisions of the System Security Plan. If the Vendor's solution is hosted by DHHS, DHHS will provide supporting information to the Vendor to complete the SSP.

Conduent develops, maintains, and delivers a System Security Plan (SSP) that documents the security controls, processes, and technical safeguards used to protect the confidentiality, integrity, and availability of the MDR solution and its information assets. The SSP details the system environment, security architecture, control implementation status, roles and responsibilities, risk management practices, and compliance with applicable federal and Nevada security requirements.

We prepare the SSP by identifying system components, data flows, interfaces, hosting environments, and operational procedures within the module scope. The team documents administrative, technical, and physical controls, including access management, authentication,

encryption, audit logging, vulnerability management, incident response, contingency planning, disaster recovery, and privacy protections. The SSP also describes how security controls are implemented, monitored, and maintained throughout the project lifecycle.

We review and update the SSP on an ongoing basis to reflect changes in the system environment, newly identified vulnerabilities, implemented mitigations, revised security requirements, and the deployment of new functionality or infrastructure components. At a minimum, the team performs an annual review and incorporates updates resulting from risk assessments, security testing, audits, control reviews, and remediation activities.

Conduent will not transfer, process, migrate, load, or otherwise introduce State data into the solution environment until DHHS has reviewed and formally approved the SSP and all associated security documentation required under the contract.

The team submits the SSP and all subsequent revisions to you for review and approval, maintains version control and change history, and incorporates your feedback into updated releases. Conduent also supports SSP reviews by providing supporting documentation, security evidence, risk assessments, and control validation results. Prior to loading, transferring, or processing State data within the solution, Conduent obtains approval of the SSP and any related security documentation required by DHHS. This disciplined approach provides you with a current and accurate view of the solution's security posture throughout implementation and operations.

### *xiv. Security System Security Plan*

xiv. The SSP must address the following topics:

Conduent's System Security Plan (SSP) documents the security, privacy, operational, and compliance controls supporting the solution and its certification readiness. The SSP addresses DHHS security requirements, CMS ARS and NIST 800-53 moderate controls, infrastructure and application security, data protection, access management, monitoring, testing, and vulnerability management practices. It also describes the controls governing system configuration, communications, interfaces, and ongoing security operations, while documenting compliance with applicable federal and industry standards, including FedRAMP Moderate, SOC 1 Type 2, and SOC 2 Type 2 requirements for vendor-hosted environments.

- **Security and Privacy Controls Requirements.** Incorporates DHHS security and privacy requirements, mapping applicable controls, standards, and compliance obligations from the Security and Privacy Controls Requirements document to the solution's security architecture, operational procedures, and governance processes. The plan documents how required safeguards are implemented across the system environment and identifies the policies, procedures, technical controls, and operational practices that support compliance.
- **Acceptable Risk Safeguards (ARS) Compliance.** Discusses how Conduent aligns its security framework with CMS Acceptable Risk Safeguards (ARS) to assess CIA and NIST SP 800-53 Rev 4 protections for confidentiality, integrity, and availability of system information and services at a "moderate" control level. Details safeguards for access control, authentication, encryption, audit logging, configuration management, incident response, continuous monitoring, contingency planning, and disaster recovery.

- **Data Center Physical Security.** Describes how Conduent provides data center physical security through layered safeguards designed to protect facilities, infrastructure, and information assets from unauthorized access, damage, theft, and environmental threats. Physical security measures include controlled facility access, badge-based entry systems, visitor management procedures, security personnel, video surveillance, and continuous monitoring of critical areas.
- **Network Segmentation, Access Controls, and Forensics.** Defines how Conduent protects the MDR solution through a network security architecture that separates environments, applications, databases, and supporting services based on business and security requirements. The plan documents the use of network segmentation technologies, firewalls, secure routing, and traffic filtering controls to limit communications between network zones and reduce exposure to unauthorized access or lateral movement.
- **Perimeter Security.** Includes how Conduent protects the MDR solution through multiple layers of perimeter security, e.g., firewalls, intrusion detection and prevention capabilities, secure gateways, traffic filtering, and network monitoring tools, to monitor, control, and restrict inbound and outbound network traffic. The plan includes how our team reviews security events, analyzes potential threats, applies security updates, and responds to identified risks to maintain a strong security posture.
- **Application Security and Data Sensitivity Classification.** Details how Conduent classifies data according to its sensitivity and regulatory requirements and applies appropriate safeguards based on the type of information being processed, stored, or transmitted. Security controls such as encryption, role-based access controls, audit logging, data handling procedures, and secure transmission protocols protect sensitive information from unauthorized access, disclosure, alteration, or loss.
- **End-point Protections.** Guides how Conduent protects servers, workstations, and other endpoint devices through a multi-pronged security approach that combines preventive, detective, and responsive controls. It explains how our team deploys host-based intrusion detection and prevention capabilities, endpoint protection platforms, anti-malware tools, configuration management controls, and security monitoring solutions to identify and respond to potential threats.
- **Prohibited Functions, Ports, Protocols, and Services.** Describes how our team reviews system components against approved security baselines, regulatory requirements, and organizational security standards to identify unnecessary or unauthorized services and communications paths. It describes the restriction or disablement of non-essential ports, protocols, functions, and services within servers, applications, databases, network devices, and endpoint systems.
- **Security-Related Configurations and Changes.** Provides direction regarding how Conduent performs network, firewall, server, and security-related configuration changes through established change management and security governance processes. The plan includes how we evaluate proposed changes for operational, security, and compliance impacts, document the modifications, obtain required approvals, and implement changes in accordance with other approved procedures.

- **Intrusion Detection and Prevention.** Describes a layered security monitoring and threat protection strategy to identify, analyze, and block unauthorized or suspicious activity across the solution environment. It includes how our team deploys intrusion detection and prevention technologies that monitor network traffic, system events, and endpoint activity for indicators of compromise, malicious behavior, policy violations, and other security threats.
- **Network Scanning Tools.** Explains how Conduent uses network scanning tools to identify, assess, and monitor vulnerabilities, configuration issues, and security risks across network devices, servers, databases, applications, and other infrastructure components. It details how we review and prioritize scan results, track findings through established remediation processes, and validate corrective actions through follow-up assessments.
- **Host Hardening.** Documents how Conduent performs host hardening by applying secure configuration standards to servers, operating systems, virtual machines, and other computing platforms. It addresses how our team removes or disables unnecessary services, applications, accounts, ports, and protocols; applies security patches and updates; configures security settings in accordance with approved baselines; and restricts administrative access based on business and operational needs.
- **Internet Filtering.** Describes the internet filtering controls Conduent uses to monitor and manage web-based traffic and restrict access to unauthorized, malicious, or high-risk websites and online services. It includes how we apply security policies that limit access based on business need and blocks categories of sites that could introduce security threats, malware, phishing attacks, or other risks to the environment.
- **Remote Access.** Guides how Conduent provides and monitors remote access through secure, controlled mechanisms that support authorized user connectivity while protecting system resources and sensitive information. We use encrypted communication channels, multifactor authentication, role-based access controls, and approved remote access technologies to restrict access. It describes how we monitor remote access activity through logging, auditing, and security monitoring tools that detect activity and investigate potential security events.
- **Encryption Of Data at Rest and in Transit.** Details how Conduent protects sensitive information through encryption technologies that safeguard data both when stored and when transmitted between systems, applications, users, and external partners. It details how we apply industry-standard encryption methods to databases, file systems, backups, storage platforms, and other repositories containing confidential or regulated information, including PHI and PII.
- **User Authentication and Directory Services.** Explains how Conduent manages user authentication and directory services through centralized identity and access management processes that control access to systems, applications, and data resources. It describes the use of approved credentials and multifactor authentication methods and role-based security principles to restrict access.

- **External Interfaces and Data Exchange.** Describes Conduent's interfaces with external entities through secure, standards-based integration methods that support data exchange with State systems, federal partners, MCOs/MAOs, service providers, vendors, and other authorized stakeholders. It describes how we design and maintain integrations using approved interface specifications, data exchange standards, APIs, web services, secure file transfers, and other authorized communication methods.
- **System Penetration Testing.** Details how Conduent conducts penetration testing to evaluate the security of applications, infrastructure, interfaces, and supporting environments by simulating real-world attack scenarios and identifying potential vulnerabilities before they can be exploited. It captures how we perform testing on networks, servers, databases, web applications, APIs, and other system components within the approved scope.
- **Management of Operating System and Security Patches.** Provides guidance regarding how Conduent manages operating system and security patches through a structured patch management process that identifies, evaluates, tests, deploys, and tracks updates across the MDR solution environment. The plan describes how Conduent monitors vendor releases, security advisories, and vulnerability notifications to identify patches relevant to supported infrastructure, operating systems, databases, applications, and security tools.
- **Anti-Virus and Malware Detection and Email Gateways.** Guides how Conduent protects the MDR solution environment through a combination of anti-virus, anti-malware, and email security technologies designed to detect, block, and respond to malicious activity. It guides the deployment of endpoint protection tools across servers, workstations, and other supported devices to identify viruses, ransomware, spyware, malicious code, and other emerging threats.
- **Assessment and Testing of System and Code Modifications.** Documents the processes, controls, and governance activities we use to evaluate and validate system and code changes throughout the solution lifecycle. The plan describes how modifications are reviewed for security, operational, and compliance impacts and managed through established change control procedures before deployment.
- **Allowable internal and external communication protocols.** Details approved methods and controls governing communications within the solution and between the solution and external entities. The SSP identifies authorized internal and external communication protocols, interface connections, network pathways, and data exchange mechanisms used to support business and operational functions. The plan describes security requirements for transmitting data across networks.
- **FedRAMP and NIST Moderate Security Compliance.** Describes the assessments, controls, and compliance activities that support alignment with FedRAMP requirements or the NIST SP 800-53 Rev. 4 Moderate control baseline for Conduent-hosted solutions. The SSP identifies applicable security requirements, describes how controls are implemented, and maps security safeguards to regulatory and contractual obligations.

24) Compliance with Statement on Standards for Attestation Engagements (SSAE-16) SOC 1 Type 2.

- **SSAE 16 SOC 1 Type 2 Compliance and Attestation.** Documents the controls, processes, and independent assurance activities that support compliance with SSAE 16 SOC 1 Type 2 requirements for applicable hosted environments and service operations. It also documents processes for access management, change control, system monitoring, incident management, backup and recovery, configuration management, and other operational practices included within the scope of the attestation.
- **SSAE 16 SOC 2 Type 2 Compliance and Attestation.** Describes the controls, governance processes, and independent assessment activities that support compliance with SSAE 16 SOC 2 Type 2 requirements for applicable hosted environments and operational services. It describes the security, availability, processing integrity, confidentiality, and privacy controls implemented across the solution and identifies the policies, procedures, and technologies used to protect systems and data.

## c. Operational Readiness Review (ORR)

i. The Vendor shall develop Operational Readiness Review Checklists (ORR) that will examine the actual solution characteristics and the procedures of the product's operation to ensure that all hardware, software, resources, procedures, and user documentation accurately reflect the deployed state of the system.

Conduent develops Operational Readiness Review (ORR) Checklists to evaluate the readiness of the solution for deployment, operations, and ongoing support. The checklists are based on approved project requirements, system configurations, operational procedures, technical documentation, and DHHS readiness criteria, providing a structured method for assessing whether the solution is prepared for production use.

The ORR Checklists are used to verify that operational teams are fully prepared to assume responsibility for supporting and maintaining the solution in production. The review focuses on operational readiness by confirming that staff have the knowledge, training, procedures, and supporting documentation needed to perform their responsibilities effectively. Through the ORR process, Conduent validates that operational processes are established, staff are prepared to execute routine and exception-based activities, and the resources necessary to support ongoing operations are in place. This ensures the organization can confidently manage, maintain, and support the solution in accordance with documented procedures and business requirements.

Conduent updates the checklists throughout implementation and readiness activities to reflect approved changes, completed testing, and operational decisions. Conduent documents review results, tracks deficiencies through established issue management processes, and validates corrective actions before readiness reviews. The completed ORR Checklists provide you with a comprehensive assessment of solution readiness and a documented comparison between the deployed environment and supporting operational, technical, and user documentation, supporting Operational Readiness Reviews, certification activities, and production deployment decisions.

## *CMS Conditions for Enhanced Funding Compliance and Certification Support*

ii. The Vendor's solution must comply with all vendor-applicable requirements outlined in CMS Conditions for Enhanced Funding 42 C.F.R. §433.112. The Vendor must conduct all activities and provide the necessary documentation and artifacts to evidence compliance with these conditions.

Conduent's MDR solution complies with all vendor-applicable requirements of the CMS Conditions for Enhanced Funding, 42 C.F.R. § 433.112. Our team conducts requisite activities and develops, maintains, and submits all documentation, evidence, and artifacts necessary to demonstrate compliance with applicable CMS and DHHS requirements throughout the project lifecycle.

The MDR solution supports modularity, interoperability, standards-based integration, data sharing, security, privacy, accessibility, program integrity, and MITA-aligned business processes consistent with CMS certification and enhanced funding expectations. We incorporate federal and State requirements into solution design, implementation, testing, operations, and certification activities to support ongoing compliance and certification readiness.

Conduent develops, maintains, and delivers required compliance and certification artifacts, including requirements traceability matrices (RTMs), certification crosswalks, implementation plans, design documentation, test plans and test results, security and privacy documentation, operational procedures, and certification evidence. These artifacts provide traceability among regulatory requirements, business objectives, implemented functionality, testing activities, CMS Required Outcomes, State-Specific Outcomes, and Conditions for Enhanced Funding.

Throughout the project lifecycle, Conduent conducts reviews, assessments, validation activities, and quality management processes to verify compliance with applicable federal and State requirements. Conduent will support DHHS and CMS certification, audit, and oversight activities by providing requested documentation, demonstrations, reports, and supporting evidence.

Conduent will maintain end-to-end traceability between Conditions for Enhanced Funding, CMS Required Outcomes, State-Specific Outcomes, project deliverables, certification evidence, testing results, and operational documentation to support CMS certification reviews and federal funding approval activities.

## *System Testing, User Acceptance Testing, and Operational Readiness Support*

iii. The Vendor shall ensure that all system testing, specifically user acceptance testing, is completed in advance of Operational Readiness Review (ORR), allowing for timely collection and submission of comprehensive evidence and test reports to CMS.

Conduent follows a testing and readiness approach that schedules system testing activities, including User Acceptance Testing (UAT), before ORR activities begin. Test plans, schedules, entry and exit criteria, and milestone reviews are developed early in the project lifecycle to align testing completion with implementation and certification timelines.

We execute functional, integration, system, and UAT, tracks defects through resolution, performs retesting, and documents test outcomes prior to readiness assessments. Test results, defect logs, traceability documentation, approvals, and supporting evidence are collected and organized throughout the testing process, providing a complete record of validation activities.

Following completion of testing, we compile test reports, evidence packages, and supporting artifacts that demonstrate system performance, business process validation, and compliance with certification objectives. These materials support ORR activities and provide you with the documentation needed for certification reviews and CMS submissions in accordance with approved project schedules. By completing all system testing, including UAT, before ORR activities begin, Conduent enables the timely collection, validation, and submission of comprehensive testing evidence and certification artifacts required by DHHS and CMS.

## d. Certification Review

i. The Vendor shall develop and submit all evidence, artifacts, and documents deemed necessary for certification by DHHS and CMS in accordance with DHHS's schedule.

Conduent develops, maintains, and submits certification evidence, supporting artifacts, and project documentation that meet DHHS and CMS certification requirements. Working closely with you, project stakeholders, and participating organizations, we identify required deliverables, map certification criteria to project artifacts, and maintain traceability among requirements, solution components, testing activities, operational processes, and certification outcomes.

Our team collects, validates, organizes, and maintains certification documentation, including RTMs, certification crosswalks, design documents, test plans, test results, security and privacy artifacts, operational readiness materials, reports, presentations, and supporting evidence. These artifacts establish traceability between certification requirements, implemented solution capabilities, testing results, operational readiness activities, CMS Required Outcomes, State-Specific Outcomes, and certification outcomes. Conduent performs quality reviews to identify gaps, verify completeness, and confirm consistency across all certification submissions.

Throughout the project lifecycle, our team updates certification artifacts to reflect approved changes, completed testing activities, operational readiness milestones, and certification review feedback. We maintain a centralized repository of certification evidence, including traceability artifacts, certification crosswalks, test results, review records, approvals, and supporting documentation, and provides you access to these materials throughout certification activities.

All required documentation, evidence packages, and supporting artifacts are submitted in accordance with DHHS-established schedules and milestones, supporting certification reviews, audits, demonstrations, CMS approval activities, and federal funding reviews. This approach provides your team with timely access to complete, accurate, and traceable certification documentation throughout the certification process.

### *Disaster Recovery Testing and Results Reporting*

ii. The Vendor must create and execute a full disaster recovery test and submit the results of that test to DHHS in line with CMS certification timeline requirements.

We develop and execute comprehensive disaster recovery testing to validate the MDR solution's ability to restore critical business functions, applications, infrastructure, interfaces, and data following a disruption. Disaster recovery test scenarios are based on documented recovery procedures, recovery time objectives, recovery point objectives, system dependencies, and operational requirements.

Our team plans and conducts recovery exercises that simulate potential outages and disaster conditions. Through these exercises, we validate failover and recovery processes, measure recovery performance, and document test results, observations, issues, and corrective actions. We track identified gaps and improvement opportunities during remediation. We update recovery procedures to reflect lessons learned.

Following completion of the exercise, our team prepares a disaster recovery test report that summarizes test objectives, scope, activities performed, results, findings, recovery metrics, and remediation status. Supporting evidence, logs, and validation documentation are maintained as part of the certification record. We submit the test results and related artifacts to DHHS in accordance with project milestones and CMS certification timelines, supporting readiness assessments and certification review activities.

## e. Operations Metrics

i. The Vendor shall develop, produce, update and support initial and ongoing metrics reporting as defined by DHHS for submission to CMS on a schedule defined by DHHS. The Vendor shall provide continuous updates to certification reporting as required by CMS and DHHS.

Conduent delivers and supports metrics reporting aligned with DHHS-defined performance measures, certification objectives, and CMS reporting requirements. Reporting requirements are incorporated into solution design, data management, testing, and operational processes to support accurate, consistent measurement of system performance, business outcomes, and program operations. Conduent collaborates with you to define reporting specifications, data sources, calculation methodologies, validation procedures, and submission schedules.

We develop reports, dashboards, supporting documentation, and certification-related metrics that provide visibility into operational performance, system utilization, program effectiveness, and compliance objectives. Reporting data is validated through testing, reconciliation, and quality review activities. We update reporting artifacts as business requirements, system functionality, certification criteria, and reporting expectations evolve.

Our team maintains supporting documentation, traceability artifacts, and certification evidence that demonstrate the relationship between reported metrics, business requirements, certification outcomes, and underlying system capabilities. Documentation and reporting artifacts provide transparency into metric calculations, data sources, validation activities, and reporting processes.

### VI.A.2.I.b.3 CMS Certification Support [RFP V.G.2]

**REQUIREMENT: RFP Section V.G.2**

DHHS intends to request enhanced Federal Financial Participation (FFP) of expenditures for the implementation, maintenance, and operations of the procured system. Accordingly, Nebraska Medicaid will require the vendor to ensure that the proposed solution meets all requirements for a successful Certification and support the request to the Centers for Medicare & Medicaid Services (CMS) following adherence to the Streamlined Modular Certification (SMC) process, as introduced in the State Medicaid Director Letter (SMDL) #22-001 and detailed in the Streamlined Modular Certification for Medicaid Enterprise Systems Certification Guidance, as directed by DHHS.

Vendor must provide support throughout the project to ensure that all requirements meet DHHS and CMS deliverables and artifacts, and traceability activities are completed in a quality manner and meet project schedule dates.

Bidder shall read Attachment E – MDR CMS Certification Outcomes and Metrics to ensure their understanding of the outcomes and metrics required for the CMS certification of the MDR system.

Vendor will ensure that CMS Certification is achieved retroactive to the first day of Operations and continued throughout the Operations Phase. The Vendor is responsible for meeting the Federal standards, conditions and business requirements necessary to ensure initial and continued federal Certification for the operation of the Module and Department to receive full Federal Financial Participation (FFP) and the Federal Medical Assistance Percentage (FMAP) funding. In addition, the Vendor is responsible for meeting any new or modified Federal standards necessary to ensure initial and continued federal Certification, provided that to the

extent those standards or requirements are not outside the scope of the RFP and do not result in a material cost impact on Vendor, otherwise the Vendor shall only be required to meet them if and to the extent the parties agree to do so through the Change Order process.
To ensure achieving the CMS Certification, the vendor shall perform each of the following tasks as indicated in a. through d. below. Additionally, the Vendor must actively support certification activities coordinated by DHHS to support CMS SMC and such support must be available to State from contract award until CMS certification is granted for the MDR system.
a. CMS Certification Plan
i. The Vendor shall develop and maintain a Certification Plan that defines the Vendor's approach to CMS certification. It must describe the processes and procedures that will be used to manage certification requirements. The Certification Plan must comply with the most current CMS certification process to ensure the system will meet all certification requirements.
ii. The vendor must submit a Certification Plan no later than 90 calendar days after the Kick-off.
b. Assist DHHS with Advanced Planning Document (APD) Supporting Materials
i. Develop any materials required by DHHS to support the submission of an APD to CMS related to this project.
ii. Assist DHHS in developing metrics, and mapping them to the required outcomes to be included in any needed APDs. Please refer to “Attachment E – CMS Certification Outcomes and Metrics” for the MDR system. The CMS Certification Outcomes and Metrics must be maintained throughout the project life cycle until Certification is achieved.
c. Assist DHHS with Operational Readiness Review (ORR)
i. Develop any documentation needed for the ORR with CMS.
ii. Produce evidence that the system meets the Conditions of Enhanced Funding (CEF).
iii. Prepare for and participate in the Operational Readiness Review presentation.
d. Assist DHHS with Certification Review (CR)
i. Must remedy all system or operational issues identified by CMS prior to the certification review.
ii. Develop and update artifacts of the system meeting all required conditions of enhanced funding.
iii. Develop and update artifacts for CMS and State specific outcomes and metrics.
iv. Maintain the metrics required for the certification review.
v. Provide support to DHHS and participate in the certification review event.
vi. The vendor shall remedy any issues identified by CMS in the certification review.
Important information
CMS Certification Failure
In accordance with 42 CFR § 433.112 the State of Nebraska is seeking CMS certification. It will be considered a CMS certification failure when the State is not granted CMS Certification and, therefore
1. CMS does not fully compensate the Department at the maximum allowable Federal Financial Participation (FFP) rate and the Federal Medical Assistance Percentage (FMAP) for the system as delivered by the Vendor;
2. There are no actionable remediations offered by CMS to achieve certification; and
3. Such failure is due to the Actions of the Vendor (the failed functionalities of the system and/or a lack of sufficient documentation agreed upon with the State).
In the event of such certification failure, the Vendor will be responsible for the State’s actual damages. The actual damages are determined by using the following calculation:
The difference between the total of the sums of monies actually received from CMS by DHHS and the total of the sums of monies that could have been received by the DHHS at maximum allowable FFP and FMAP rate for the system as delivered by the Vendor, if certification was approved by CMS for the system.
These actual, consequential damages may be withheld by DHHS from sums otherwise payable to the Vendor.

***Conduent delivers the experience and strategic foresight DHHS needs to achieve timely Streamlined Modular Certification (SMC). Our approach embeds certification into every phase of delivery, ensuring alignment with CMS expectations and securing maximum federal funding. With Conduent, you have a long-term, low-risk, and high-reward partner.***

The Medicaid and Government Health sector is currently experiencing unprecedented consolidation. Several of our vendor competitors are in the midst of takeover acquisitions diverting their attention internally instead of on the state customers they serve. Many mergers have gone wrong in the past and adversely impacted their customers. In stark contrast, Conduent and our operations are 100% focused on our Medicaid and state customers and the members they serve.

**Conduent’s Support Facilitates Our Clients’ Certification Success**

- Leadership – Designated certification lead to work with DHHS
- Collaborative interactions with CMS and our clients to achieve 100% Certification Success Rate
- Tailored certification support to meet the needs of the Department
- Expertise in the CMS SMC process

We bring a 100% success rate in assisting our state clients achieve and maintain certification for the maximum allowable enhanced federal financial participation (FFP).

CMS certification is a critical component of MDR implementation. Our team aligns the proposed solution and project delivery approach with the CMS SMC framework and DHHS-directed certification requirements throughout all project phases. We incorporate applicable CMS Required Outcomes, State-Specific Outcomes, Conditions for Enhanced Funding, and certification criteria into project governance, requirements management, system design, testing, documentation, and readiness activities.

We conduct validation activities throughout the project lifecycle, including functional, integration, system, user acceptance, security, accessibility, performance, and operational readiness testing. Results are documented and linked to applicable certification outcomes, providing objective evidence of system capabilities and compliance with certification requirements.

Documentation is maintained in a DHHS-designated certification document repository. Conduent uses established document management, configuration management, and quality review processes to manage certification evidence and artifacts throughout the certification lifecycle. Certification deliverables are developed, reviewed, and maintained in a controlled environment where documents are subject to version control, change tracking, and formal approval procedures. As certification deliverables/artifacts are created, Conduent coordinates with project stakeholders to validate that the content accurately reflects implemented solution functionality, operational processes, testing results, security controls, and other certification requirements. Reviews for each deliverable/artifact also verify content quality, e.g., completeness, accuracy, consistency, and alignment with applicable State and CMS requirements and certification standards before it is designated as a final deliverable. Deliverables, artifacts, and traceability activities are tracked to confirm adherence to project schedule dates.

Once artifacts have completed the required review and approval process, Conduent maintains them as controlled documents within its document management framework. Version histories, approval records, and supporting traceability information are retained to provide a clear audit trail linking certification requirements, approved system changes, and associated evidence. This approach supports transparency throughout the certification process and facilitates efficient retrieval of solution-aligned documentation when requested by DHHS, CMS, or other authorized stakeholders.

## CMS Certification Supports

DHHS intends to request enhanced Federal Financial Participation (FFP) of expenditures for the implementation, maintenance, and operations of the procured system. Accordingly, Nebraska Medicaid will require the vendor to ensure that the proposed solution meets all requirements for a successful Certification and support the request to the Centers for Medicare & Medicaid Services (CMS) following adherence to the Streamlined Modular Certification (SMC) process, as introduced in the State Medicaid Director Letter (SMDL) #22-001 and detailed in the Streamlined Modular Certification for Medicaid Enterprise Systems Certification Guidance, as directed by DHHS.

Vendor must provide support throughout the project to ensure that all requirements meet DHHS and CMS deliverables and artifacts, and traceability activities are completed in a quality manner and meet project schedule dates.

Our approach to provide CMS Certification Support integrates planning, traceability, validation, and documentation activities. We support DHHS until CMS certification is achieved. We do this by developing and maintaining required certification plans and artifacts. We also support APD, ORR, and Certification Review activities. We maintain certification outcomes, metrics, and supporting evidence. We address certification findings through timely remediation activities. We adapt certification activities as federal requirements evolve.

**Bringing CMS Certification Innovations to Support DHHS**

Conduent has been at the forefront of certification innovation since 2012. Our team has celebrated many achievements in CMS certification, including:

- First MMIS vendor to have a system certified based on MECT protocols (DC 2012)
- First vendor to achieve CMS certification of a Medicaid Pharmacy POS module based on Federal checklists for modularity standards (Montana 2017)
- Never failed to receive federal certification, retroactive to the requested date, for any of our implementations
- Document repository folder structure and certification requirements evidence packets were named by CMS as “best practice”

Conduent begins certification planning at project kickoff, working with DHHS to define a clear roadmap that ties CMS conditions, required artifacts, and State-specific outcomes directly into the project plan. By embedding certification milestones within the Software Development Life Cycle (SDLC), we align compliance with system development activities so readiness is built in – not bolted on. As implementation moves forward, we work side by side with DHHS on the certification tasks that build toward federal approval.

### *Supporting the SMC Process*

Our certification timeline starts at the beginning of the project. As your partner, we collectively review, validate, and document all CMS conditions for enhanced funding criteria and required outcomes. This information is captured in Microsoft [redacted] to support traceability throughout the system development lifecycle. Our certification lead and project SMEs then work with your team to gather and review evidence, including security/privacy information and required artifacts, and prepare presentations to demonstrate system functionality.

Figure VI.A.2.I.a.2-3 shows an overview of the CMS certification timeline.

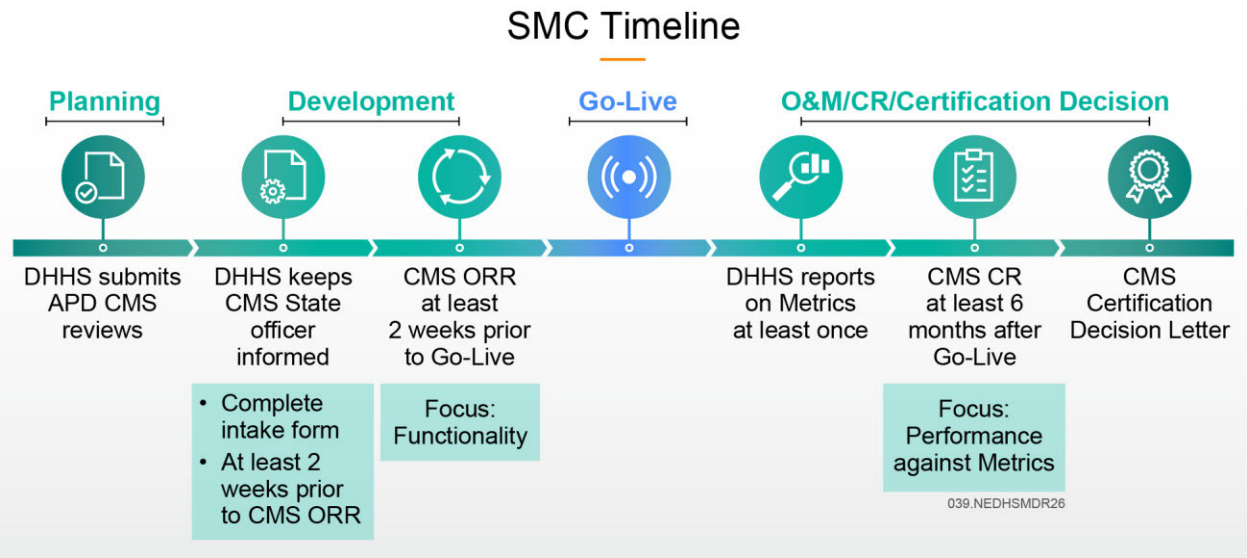



**Figure VI.A.2.I.a.2-3. Streamlined Modular Certification Timeline**

**Pre-Certification Preparation.** Prior to the CMS ORR, Conduent conducts a comprehensive pre-certification process. This includes metrics analysis and validation to ensure that all key performance indicators (KPIs), benchmarks, and compliance reports are accurate and complete. Security and compliance are also prioritized, with all necessary documentation, risk assessments, and attestations compiled for CMS certification reviews.

**CMS ORR.** Conduent prepares for the CMS ORR by compiling all required certification documentation, test results, and compliance evidence into evidence packets. These packets demonstrate how the solution meets the business functions and technical requirements as outlined in the CMS Certification Intake Form.

To provide a successful ORR, our certification lead and project SMEs collaborate with the Nebraska's certification team to conduct review sessions, validating artifacts and securing formal approvals. We also partner with your stakeholders to refine and finalize ORR presentations, ensuring that system demonstrations effectively highlight the solution's compliance with CMS Conditions and Standards.

To maximize readiness, we facilitate walkthroughs, dry runs, and a final dress rehearsal held two to three weeks before the CMS ORR. These sessions simulate the CMS review process, identify potential gaps, and verify that all materials and demonstrations are well prepared. We also provide a dedicated team of technical and business experts to support DHHS, assisting with presentations, demonstrations, and clarifications of business and technical workflows.

Throughout the ORR process, we manage action items and follow-up support, assisting DHHS in researching, documenting, and responding to CMS inquiries. Our review cycles, expert-led demonstrations, and rigorous evidence-validation process fully prepare DHHS for CMS ORR, facilitating a successful review outcome and smooth transition to the next certification phase.

### *Certification Lead*

Our certification activities are led by our certification lead, who has direct success obtaining and maintaining CMS certification for this product offering and supporting clients through the certification lifecycle. In each of these engagements, she served as the primary spokesperson for the state, overseeing all documentation, timelines, schedules, and stakeholder coordination from initiation through final approval. Her role includes facilitating meetings and maintaining direct communication with CMS and CMS partners so that all requirements are met without gaps.

For Nebraska MDR, the certification lead will coordinate all certification tasks, monitoring performance, gathering evidence, and confirming that every enhancement, including added data sources in later phases, maintains compliance with CMS certification criteria. The certification lead will remain engaged throughout the project, participating in development discussions, identifying risks early, and verifying that certification requirements are considered in every phase. This continuous oversight ensures no surprises late in the process and keeps DHHS on track for timely, audit-ready certification.

## CMS Certification Outcomes and Metrics

Bidder shall read Attachment E – MDR CMS Certification Outcomes and Metrics to ensure their understanding of the outcomes and metrics required for the CMS certification of the MDR system.

We have reviewed the *RFP Attachment E – MDR CMS Certification Outcomes and Metrics* and confirm that we understand the outcomes and metrics required for the CMS certification of the MDR system. Our solution is positioned to deliver these outcomes. Upon contract award, we will work with DHHS to review these outcomes and metrics, and fine tune as applicable. Throughout the project lifecycle, we work collaboratively with you to define, update, and verify that project artifacts effectively document how each outcome is satisfied.

## Supporting DHHS to Receive Full FFP and FMAP Funding

Vendor will ensure that CMS Certification is achieved retroactive to the first day of Operations and continued throughout the Operations Phase. The Vendor is responsible for meeting the Federal standards, conditions and business requirements necessary to ensure initial and continued federal Certification for the operation of the Module and Department to receive full Federal Financial Participation (FFP) and the Federal Medical Assistance Percentage (FMAP) funding. In addition, the Vendor is responsible for meeting any new or modified Federal standards necessary to ensure initial and continued federal Certification, provided that to the extent those standards or requirements are not outside the scope of the RFP and do not result in a material cost impact on Vendor, otherwise the Vendor shall only be required to meet them if and to the extent the parties agree to do so through the Change Order process.

**Achieving CMS Certification Retroactive to Day One of Operations.** We assist you to attain CMS certification retroactive to the first day of operations through a structured implementation approach that aligns system functionality, business processes, operational readiness, and documentation with all CMS certification requirements prior to go-live. Our certification lead monitors certification activities, track milestones, conduct readiness assessments, and rapidly address any identified gaps to support timely certification approval. Throughout the Operations Phase, Conduent maintains certification status through timely federal reporting demonstrating compliance with requirements and required outcomes. Regular reviews of CMS requirements, performance metrics, and corrective action plans enable Conduent to sustain compliance and adapt efficiently to evolving CMS directives and program requirements.

**Meeting Federal Standards, Conditions, and Business Requirements to Support Ongoing CMS Certification.** Our team supports initial and ongoing federal certification by implementing and operating the MDR module in accordance with all applicable CMS conditions and standards (C&S), State business requirements, other applicable federal regulations. During implementation, Conduent aligns system functionality, security controls, business processes, interfaces, testing activities, and project documentation with CMS certification criteria and federal guidance. Comprehensive quality assurance reviews, readiness assessments, and traceability of requirements to deliverables and artifacts provide evidence that the MDR module meets certification expectations and supports eligibility for full Federal Financial Participation (FFP) and applicable Federal Medical Assistance Percentage (FMAP) funding. Regular audits, security assessments, data quality reviews, and compliance validations confirm that the MDR solution continues to satisfy federal standards and program requirements.

**Conduent Demonstrates Proven and Relevant SMC Experience and Expertise**

We recently completed certification of our Maryland PBM project in 2024 using the new SMC guidelines. The certification process was completed with no major issues, and **the team was commended by CMS for our thorough evidence packets and attention to detail.** We apply lessons learned and best practices from these projects to help DHHS achieve your certification goals.

Conduent tracks evolving CMS guidance and other federal standards and regulations, updating processes, system functionality, and associated documentation, as needed, to meet new/updated in-scope requirements and support ongoing CMS certification. Out-of-scope changes will be processed per DHHS direction via the Contract Change Order process. This proactive governance approach enables DHHS to preserve federal certification and maximize continued access to available FFP and FMAP funding throughout the life of the contract.

## CMS Certification Tasks

To ensure achieving the CMS Certification, the vendor shall perform each of the following tasks as indicated in a. through d. below. Additionally, the Vendor must actively support certification activities coordinated by DHHS to support CMS SMC and such support must be available to State from contract award until CMS certification is granted for the MDR system.

We support all certification activities coordinated by DHHS to obtain CMS SMC for the MDR solution, from contract award through final certification approval. Conduent assigns experienced certification, project management, technical, and business subject matter experts (SMEs) to collaborate with your team in planning, preparing, and executing certification-related activities. At a high level, certification support includes:

- Developing and maintaining certification work products
- Mapping system capabilities to CMS SMC criteria
- Preparing certification documentation, traceability matrices, and operational evidence
- Participating in readiness assessments
- Providing timely responses to CMS and DHHS requests for information

We also assist with certification reviews, demonstrations, presentations, site visits, artifact collection, gap analyses, and corrective action planning to address any identified findings. Throughout the certification process, Conduent tracks certification requirements, monitors progress against milestones, maintains the certification documentation repository, and coordinates closely with you, CMS, and other stakeholders to facilitate efficient review and approval activities. This collaborative approach provides the State with continuous certification support from contract award until CMS grants certification for the MDR solution.
Table VI.A.2.I.a.2-4 summarizes the support activities we perform to assist you with guiding, documenting, and validating Nebraska's certification progress.

**Table VI.A.2.I.a.2-4. Certification Support Activities**

| Activity | Description |
|---|---|
| Certification Plan | We develop a comprehensive Certification Plan that guides DHHS from project initiation through successful certification. The plan includes our approach and outlines timelines, stakeholder roles, artifact development, and review milestones for DHHS review and approval. |
| Certification Meetings | We host and lead meetings with DHHS, CMS, and key stakeholders. These begin with project kickoff and continue through pre-certification reviews, Operational Readiness Review (ORR), and Certification Review (CR), providing coordinated progress. |
| Outcomes and Metrics Development | Our certification lead and SMEs work with DHHS to define CMS and DHHS-specific metrics, identify required certification outcomes and performance benchmarks, provide evidence sources to demonstrate compliance, and meet all reporting requirements. |
| Test Plan Aligned to CMS Testing Framework | We develop a CMS-compliant test plan to validate functionality, enable early issue detection and mitigation, and confirm traceability to CMS Conditions and Standards. |
| Certification Evidence Packets | We work with DHHS to create Evidence packets that include test scenarios and validation artifacts linked to specific CMS certification outcomes, UAT screen captures for compliance verification, and compliance reports. These packets demonstrate alignment with CMS standards and provide evidence to prepare DHHS for the CMS ORR and CR. |
| Certification Evidence Approval & Repository Management | We collaborate with DHHS in finalizing certification evidence and store approved artifacts in a centralized repository [redacted]. This repository serves as the single source of truth for storing and tracking all certification evidence, compliance artifacts, and reporting documentation, giving CMS, DHHS, and auditors access to required materials throughout the review process. |
| Certification Intake Form Approval & Submission | We work with DHHS to prepare the CMS SMC Intake Form outlining funding conditions, outcomes, and metrics. Once DHHS approves the form, we submit it along with the associated evidence packets and supporting documentation to CMS in preparation for formal certification. |

## *a. CMS Certification Plan*

a. CMS Certification Plan

i. The Vendor shall develop and maintain a Certification Plan that defines the Vendor's approach to CMS certification. It must describe the processes and procedures that will be used to manage certification requirements. The Certification Plan must comply with the most current CMS certification process to ensure the system will meet all certification requirements.

ii. The vendor must submit a Certification Plan no later than 90 calendar days after the Kick-off.

**a.i. Develop and Maintain the Certification Plan (CP).** The CP is developed in collaboration with DHHS to define the approach for achieving CMS certification and align with program goals. It outlines the tools, methodology, and activities required to achieve and maintain certification throughout the project. The plan contains a clear breakdown of tasks across each lifecycle project phase. The CP also establishes DHHS and Conduent roles and responsibilities and measures to track progress and validate the accuracy of data used in CMS submissions. Conduent's certification lead coordinates these activities, providing oversight, reporting, and communication. The Certification Plan includes:

- **Certification Approach.** A detailed description of how the certification process will be conducted, including the milestones, responsibilities, and timelines.
- **Processes and Procedures.** Documentation of the steps and methodologies used to address CMS requirements, including evidence preparation, certification phase deliverables, and alignment with CMS outcomes.
- **Certification Evidence Preparation.** A plan for creating evidence packets that include artifacts such as test scenarios, results, screen captures, and operational documentation. The plan also details Conduent's responsibility for capturing and supplying all required data, supporting documents, and information to meet CMS evaluation criteria, benchmarks, metrics, approved Key Performance Indicators (KPIs), and any additional requests from CMS.
- **Roles and Responsibilities.** Identification of the project team members responsible for certification activities, including the certification lead and key stakeholders.
- **Training and Readiness Activities.** Details on training DHHS staff and stakeholders to support certification activities, including artifact development, evidence submission, and preparation for CMS Operational Readiness and Certification Reviews.

**a.ii. Certification Plan Submission.** Conduent submits the Certification Plan to DHHS for review and approval no later than 90 calendar days after the Kick-off.

## *b. Assisting with Advanced Planning Document Supporting Materials*

b. Assist DHHS with Advanced Planning Document (APD) Supporting Materials

i. Develop any materials required by DHHS to support the submission of an APD to CMS related to this project.

ii. Assist DHHS in developing metrics, and mapping them to the required outcomes to be included in any needed APDs. Please refer to "Attachment E – CMS Certification Outcomes and Metrics" for the MDR system. The CMS Certification Outcomes and Metrics must be maintained throughout the project life cycle until Certification is achieved.

**b.i. APD Documentation Development and Enhancements/Changes Over Time.** Conduent partners with DHHS to develop and maintain all documentation, analyses, and supporting materials required for CMS review and approval of Advanced Planning Documents (APDs)

associated with the MDR project. This includes preparing project narratives, certification support materials, implementation approach descriptions, project schedules, budget-related information, risk and mitigation summaries, and other CMS-required artifacts necessary to support APD submissions and updates throughout the project lifecycle. We will continue to contribute to the APD even after go live.

**b.ii. Metrics Development.** In addition, Conduent assists DHHS in defining, documenting, and maintaining the metrics required for certification, mapping them to requisite outcomes included in any needed APDs. Using the outcomes identified in Attachment E, Conduent works collaboratively with DHHS to develop measurable performance metrics and establish traceability between system functionality, business processes, testing activities, and the required CMS and State-specific outcomes. Conduent maintains the CMS Certification Outcomes and Metrics repository, mapping supporting evidence, and reporting throughout the project lifecycle, confirming continued alignment with CMS certification requirements and readiness activities until CMS Certification is successfully achieved.

## *c. Assisting with Operational Readiness Review*

c. Assist DHHS with Operational Readiness Review (ORR)
i. Develop any documentation needed for the ORR with CMS.
ii. Produce evidence that the system meets the Conditions of Enhanced Funding (CEF).
iii. Prepare for and participate in the Operational Readiness Review presentation.

**c.i. CMS ORR Documentation Development.** Conduent supports DHHS's Operational Readiness Review (ORR) by developing and maintaining the evidence packets, artifacts, analyses, and supporting materials needed to demonstrate operational readiness and compliance with CMS requirements. Conduent collaborates with DHHS stakeholders to prepare required documentation, validate its completeness and accuracy, and align submissions with applicable CMS guidance and certification objectives.

**c.ii. Meeting Conditions for Enhanced Funding (CEF).** To demonstrate CEF fulfillment, Conduent compiles and presents objective evidence from system design, testing, operations, security, program integrity, and performance activities. Our team maintains bidirectional traceability among requirements, solution components, testing artifacts, certification outcomes, and supporting evidence to demonstrate how system capabilities satisfy certification objectives. We develop and maintain certification crosswalks, requirements traceability matrices, and deliverable/artifacts, e.g., test plans, test results, operational readiness artifacts, security documentation, and other supporting materials required for certification review.

**c.iii. ORR Presentation Preparation and Participation.** We work collaboratively with DHHS in planning and executing ORR activities by developing presentation materials, coordinating rehearsals, preparing subject matter experts, and participating in review sessions. We recommend ORR dry runs with the State two weeks prior to the official ORR to practice evidence presentations, simulated CMS Q&A sessions, and support other ORR preparation tasks.

During the ORR, Conduent prepares for and performs a key supporting role to DHHS in the ORR presentation. As directed by DHHS, we assemble the presentation’s technical and operational information, assist DHHS with responding to reviewer questions, provide requested evidence, and support follow-up activities to facilitate a successful review and certification outcome.

## *d. Assisting with Certification Review(s)*

d. Assist DHHS with Certification Review (CR)
i. Must remedy all system or operational issues identified by CMS prior to the certification review.
ii. Develop and update artifacts of the system meeting all required conditions of enhanced funding.
iii. Develop and update artifacts for CMS and State specific outcomes and metrics.
iv. Maintain the metrics required for the certification review.
v. Provide support to DHHS and participate in the certification review event.
vi. The vendor shall remedy any issues identified by CMS in the certification review.

Six months after system go-live, Conduent prepares for the CMS CR by gathering and validating production evidence to demonstrate compliance. We store all required artifacts in the certification document repository, providing easy access for CMS auditors and DHHS stakeholders. This production evidence includes representative data samples, compliance reports, operational metrics, and system-generated reports, all of which are used to validate that the system is performing as expected and achieving DHHS' defined business outcomes.

To meet CMS certification benchmarks, we collaborate with DHHS to calculate, review, and submit operational metrics, including at least one-quarter's worth of data collected within three months of go-live. This allows CMS to assess the system's real-world performance and compliance with federal funding requirements. Conduent also assists in populating the CMS Operational Report Workbook and other required certification documents, providing accuracy and alignment with federal expectations.

To demonstrate functional equivalence, Conduent provides a comprehensive set of certification artifacts, including test scenarios, security documentation, compliance tracking reports, and validation evidence. Our certification lead and SMEs work closely with DHHS to maintain, update, and submit these materials.

As with ORR, Conduent conducts a structured pre-certification review process, which includes walkthroughs, dry runs, and final dress rehearsals to validate all certification artifacts, refine system demonstrations, and resolve any compliance issues. During the CMS CR, our certification lead oversees system demonstrations, addresses CMS inquiries, and submits required documentation.

**Ongoing Certification Support.** Following go-live, we continue to monitor performance, gather additional production evidence, and support DHHS in meeting all CMS certification criteria. We produce monthly and quarterly reports, including metric calculations and updates to the CMS Operational Report Workbook, to maintain certification tracking.

Using [redacted] dashboards, we provide DHHS with visibility into certification progress, including status, benchmarks, and artifact tracking. During both the CMS ORR and CR phases, we provide hands-on support and verify that all CMS inquiries are addressed so that DHHS achieves full CMS certification approval on schedule.

As the MDR solution expands in Phase 2 and Phase 3, with new data sources and modules integrated, we work with DHHS to ensure that each addition is incorporated into the certification evidence framework. This includes identifying how new data supports previously defined outcomes metrics, updating reports and dashboards to reflect the broader data set, and capturing evidence that demonstrates continued compliance with CMS conditions and standards.

As solutions are developed, Conduent assists end users in identifying reports and dashboards that demonstrate the required business outcomes during ORR and CR. This involves:

- **Identifying Key Reports and Dashboards.** Helping end users pinpoint the specific reports and dashboards that will showcase the solution's effectiveness and compliance during reviews.
- **Providing Support Documentation.** Offering necessary documentation, including testing documentation and data, to support the certification process.
- **Creating Queries and Extracts.** Assisting in the creation of queries and data extracts that support ongoing operational metrics in a format that is consumable for CMS.

### *Certification Review Requirements Responses*

**d.i. Resolution of Pre-Review Findings.** Before the Certification Review, Conduent works with DHHS to identify, prioritize, and correct system, technical, and operational deficiencies identified through CMS feedback, readiness assessments, testing activities, audits, or internal reviews. Conduent implements corrective actions, validates results, and documents the resolution of each item to demonstrate readiness for certification activities.

**d.ii. Documentation Supporting Enhanced Funding Requirements.** Conduent develops, maintains, and updates certification artifacts that demonstrate alignment with federal enhanced funding criteria. These materials include requirements traceability, system and operational documentation, testing results, governance records, and other evidence that supports compliance with applicable CMS certification requirements.

**d.iii. Documentation for CMS and State Outcomes and Measures.** Conduent prepares and refreshes artifacts that demonstrate achievement of CMS-defined outcomes and DHHS program requirements. Our team maps system capabilities, business processes, and operational performance to the applicable outcomes and produces supporting evidence that demonstrates measurable program value.

**d.iv. Management of Required Performance Measures.** Conduent collects, validates, monitors, and reports the performance data required for the certification review. We maintain accurate and current metrics, perform trend analysis, and retain supporting documentation that substantiates reported results and operational performance.

**d.v. Participation in Certification Review Activities.** Conduent provides hands-on support throughout the Certification Review by assisting with planning, presentation development, artifact preparation, demonstration scripts, and reviewer responses. Conduent subject matter experts participate in review sessions, present system and operational capabilities as needed, provide answers to reviewer questions, and provide additional information requested by DHHS or CMS.

**d.vi. Resolution of Post-Review Findings.** Following the certification review, Conduent evaluates CMS observations and recommendations, develops corrective action plans, implements required changes, updates supporting documentation, and validates completed remediation activities. We work closely with DHHS to track each finding through closure and provide evidence supporting resolution.

### *In the Event of Certification Failure*

In the event of such certification failure, the Vendor will be responsible for the State's actual damages. The actual damages are determined by using the following calculation: The difference between the total of the sums of monies actually received from CMS by DHHS and the total of the sums of monies that could have been received by the DHHS at maximum allowable FFP and FMAP rate for the system as delivered by the Vendor, if certification was approved by CMS for the system. These actual, consequential damages may be withheld by DHHS from sums otherwise payable to the Vendor.

Conduent is committed to supporting DHHS in achieving and maintaining CMS certification for the MDR solution. As part of our proposed team, Conduent has included a dedicated, experienced CMS certification lead who has direct success obtaining and maintaining CMS certification for this product offering and supporting clients through the certification lifecycle. This resource works directly with our project manager on certification related matters. The project manager will maintain her role as primary point of contact with DHHS and CMS stakeholders to guide certification activities, monitor compliance with certification requirements, identify and address potential risks early, and lead the development and execution of any corrective action or remediation activities necessary to support timely certification outcomes.

Conduent will provide the documentation, analysis, subject matter expertise, and operational support required throughout the certification process and will collaborate with DHHS to address any certification-related findings or recommendations. If a certification outcome results in a reduction of federal funding available to DHHS, the State may determine its actual damages in accordance with the methodology set forth in the Contract, based on the difference between the federal funding actually received and the funding that would have been available had the delivered MDR solution achieved certification at the maximum allowable FFP and FMAP rates. Subject to the terms and conditions of the Contract, DHHS may recover such damages, including through offsets against amounts otherwise payable to Conduent.

## VI.A.2.I.c Project Work Plan and Management [RFP V.H]

**REQUIREMENT: RFP Section V.H – pg. 64**

The vendor shall designate a dedicated project team, including project managers, business analysts, sponsors, and key stakeholders, who will collaborate with the State throughout the project lifecycle. IMPORTANT NOTE: When designating the project team, the Vendor must select and resource subject matter experts proficient in the Drug Rebate domain.

***Conduent's multidisciplinary project team remains actively engaged throughout the entire Medicaid Drug Rebate (MDR) System lifecycle. The team supports all phases of the effort, from project initiation and requirements validation through implementation, CMS certification, Go-Live, and ongoing operational support.***

### Dedicated Project Team and Drug Rebate Subject Matter Experts

Conduent has the Medicaid Rebate Expertise Nebraska can count on. We have the Medicaid rebate expertise and experience to run Nebraska's MDR services program smoothly and efficiently. **We provide a superior understanding of and capability to navigate the challenges associated with government benefits and services delivery.** Our team structure brings together experienced project leadership, Medicaid technology specialists, and seasoned Drug Rebate Subject Matter Experts (SMEs). We also have experienced business analysts. data conversion experts, testing professionals, and training resources. These SMEs possess extensive experience administering and supporting Medicaid Drug Rebate Programs (MDRP), providing deep program knowledge throughout the implementation.

**Conduent has Processed Pharmacy Claims through MMIS since 1982**

Conduent offers complete independence from:

- Drug manufacturers
- Wholesalers
- Specialty Pharmacies
- Other parties that may seek to influence prescribing and utilization patterns

Unlike vendors that rely on general healthcare resources, Conduent staffs this project with professionals who specialize in Medicaid pharmacy and drug rebate operations. Our rebate administration team has supported state Medicaid drug rebate programs for more than 27 years. We currently manage billions of dollars in federal and supplemental rebate activities annually. **Conduent became the first contractor to process Medicaid pharmacy claims at the Point of Sale in 1992.** Our team understands the operational, financial, technical, and regulatory complexities of rebate invoicing, collections, dispute resolution, and payment allocation. This experience also supports reporting, manufacturer communications, and CMS compliance activities.

While the PBM industry is consolidating with vendor takeover acquisitions, Conduent and our PBM solution operations are **100% focused on our Medicaid customers and the members they serve.** Conduent is the low-risk, transparent choice and DHHS can be confident in our abilities to serve the families of Nebraska. We have the resources necessary to perform a seamless implementation and provide quality service throughout the contract term.

## *Dedicated Project Governance Structure*

Table VI.A.2.I.a.2-5 details our team's key personnel titles and corresponding responsibilities. Conduent uses the following key personnel titles and stakeholder groups to support Nebraska DHHS.

**Table VI.A.2.I.a.2-5. Key Personnel Titles and Responsibilities**

| Title | Responsibilities |
|---|---|
| Executive Sponsor | • Provides executive oversight and strategic direction<br>• Removes organizational barriers<br>• Monitors contract performance and project outcomes<br>• Participates in executive steering committee meetings |
| Project Director | • Provides overall project leadership<br>• Oversees project governance and delivery performance<br>• Coordinates executive communications<br>• Escalates and resolves critical issues |
| Project Manager | • Serves as the primary point of contact for DHHS<br>• Manages scope, schedule, budget, and resources<br>• Coordinates all project activities and deliverables<br>• Maintains the Integrated Master Schedule<br>• Tracks risks, issues, and dependencies |

| Title | Responsibilities |
|---|---|
| Business Analysis Lead | • Facilitates requirements gathering and validation<br>• Conducts business process assessments<br>• Maintains requirements traceability<br>• Supports design reviews and user acceptance activities |
| Drug Rebate Program SME Lead | • Provides Medicaid Drug Rebate Program expertise<br>• Advises on federal and state rebate requirements<br>• Supports business-process design and optimization<br>• Guides rebate operations, invoicing, collections, disputes, and reporting activities<br>• Assists with CMS certification activities |
| Technical Architect | • Designs the overall solution architecture<br>• Oversees integrations, security, and infrastructure requirements<br>• Supports technical decision-making and system scalability |
| Data Conversion Lead | • Manages historical data migration activities<br>• Oversees data mapping, cleansing, validation, and reconciliation<br>• Supports conversion testing and production migration |
| Testing and Quality Assurance Lead | • Oversees testing strategy and execution<br>• Manages defect tracking and remediation<br>• Coordinates User Acceptance Testing (UAT)<br>• Supports operational readiness validation |
| Training and Organizational Change Lead | • Develops training materials and knowledge-transfer plans<br>• Conducts user and administrator training<br>• Supports stakeholder readiness and adoption |
| CMS Certification Lead | • Manages certification planning and artifact development<br>• Coordinates requirements traceability activities<br>• Supports CMS reviews and certification readiness efforts |
| Operations and Support Lead | • Coordinates transition to operations<br>• Supports Go-Live and stabilization activities<br>• Manages knowledge transfer and post-implementation support |

## *Drug Rebate Subject Matter Expertise*

Conduent recognizes that Medicaid Drug Rebate expertise is fundamental to project success. As one of the few companies focused on solutions and services for the public sector industry, Conduent brings unparalleled experience. **We provide a superior understanding of and capability to navigate the challenges associated with government benefits and services delivery. Conduent offers complete independence from drug manufacturers, wholesalers, specialty pharmacies, and other parties that may seek to influence prescribing and utilization patterns.** As a publicly traded company with no ties to MCOs or pharmacies, we offer true transparency and accountability. Our pharmacy and clinical services organization is a leading full-service, independent vendor of government healthcare PBM services.

Our Drug Rebate SMEs have direct experience supporting Medicaid rebate programs, rebate accounting, manufacturer invoicing, dispute resolution, ROSI and PQAS processing, CMS reporting, and unit conversions. They also support 340B exclusion management, rebate collections, and financial reconciliation activities. We understand the business rules and operational nuances that drive successful rebate administration. We have helped states consistently achieve high rebate recovery rates and maintain compliance with evolving federal requirements.

Our rebate experts also bring hands-on experience with:

- Federal Medicaid Drug Rebate Program requirements
- CMS rebate guidance and reporting
- Labeler and manufacturer management
- Rebate invoicing and collections
- Accounts receivable management
- Drug utilization review and auditing
- Dispute resolution and resolution tracking
- Managed care rebate processing
- Supplemental rebate administration
- CMS certification support
- Historical data conversion and reconciliation

Because these professionals work daily within Medicaid drug rebate operations, they provide practical recommendations that improve efficiency, reduce implementation risk, and strengthen operational outcomes.

## *Collaborative Partnership with DHHS*

Conduent views project success as a partnership with DHHS. Our dedicated team will work side-by-side with State leadership, business users, pharmacy staff, finance personnel, and technical teams throughout the project. Through recurring status meetings, requirements workshops, design reviews, testing sessions, readiness assessments, and executive governance activities, we maintain continuous collaboration, transparency, and accountability.

By combining experienced project leadership with specialized Medicaid Drug Rebate professionals, Conduent provides Nebraska DHHS with a highly qualified team. Our team understands both the technology and business operations of the Medicaid Drug Rebate Program. This dedicated staffing model reduces project risk, accelerates decision-making, strengthens CMS certification readiness, and supports the successful delivery of a modern, fully operational Medicaid Drug Rebate System.

## *Stakeholder Collaboration*

Conduent promotes stakeholder collaboration through a structured governance model, continuous communication, and active engagement throughout every phase of the Medicaid Drug Rebate (MDR) System project. We recognize that successful modernization depends on close coordination among DHHS business leaders, pharmacy program staff, finance teams, technical personnel, executive sponsors, manufacturers, and CMS stakeholders. Accordingly, we embed collaboration into our project delivery methodology from project initiation through post-implementation support.

## *Establishing Strong Project Governance*

Conduent creates a multi-tiered governance structure that provides clear accountability, transparent decision-making, and timely issue resolution. This structure includes:

- Executive Steering Committee meetings
- Project Management Team meetings
- Functional workgroup sessions
- Technical architecture reviews
- Risk and issue review meetings
- CMS certification workgroups
- Operational readiness reviews

These forums provide stakeholders with regular opportunities to review progress, address concerns, evaluate risks, and make informed project decisions.

## *Facilitating Collaborative Requirements Development*

Our business analysts and Drug Rebate SMEs conduct interactive workshops and discovery sessions with DHHS stakeholders. These sessions collaboratively validate requirements, review business processes, identify improvement opportunities, and confirm that system functionality aligns with program objectives. Rather than presenting a preconfigured solution, we work collaboratively with stakeholders to refine workflows, reporting needs, security requirements, and operational processes.

To maintain transparency, we document decisions, track requirements through a Requirements Traceability Matrix (RTM), and provide stakeholders with visibility into requirement status and progression. Stakeholders can monitor how requirements move through design, configuration, testing, implementation, and certification.

## *Maintaining Continuous Communication*

Conduent uses a comprehensive Communication Management Plan that defines communication channels, reporting cadence, stakeholder responsibilities, and escalation procedures. Figure VI.A.2.I.a.2-4 describes how we continuously update our communications.




**Figure VI.A.2.I.a.2-4. Maintaining Continuous Communication**
*Our continuous communication allows for strong collaboration that leads to successful outcomes.*

Our communication approach keeps stakeholders informed, engaged, and aligned throughout the project lifecycle. We drive transparency and accountability through weekly project status meetings, monthly executive briefings, and written status reports that highlight progress, priorities, and key decisions. Risk and issue logs, action-item tracking, and milestone reviews enable proactive management and timely resolution of challenges. Configuration and design demonstrations provide opportunities to validate solutions and gather stakeholder feedback, while readiness assessments confirm organizational, operational, and technical preparedness for successful implementation and transition.

## *Encouraging Active Participation During Testing and Readiness Activities*

Conduent engages DHHS stakeholders throughout testing and operational readiness activities. State staff participate in:

- Test planning reviews
- User Acceptance Testing (UAT)
- Data conversion validation
- Go/No-Go readiness reviews
- Operational readiness assessments
- Training and knowledge-transfer sessions

This collaborative approach gives stakeholders confidence in the solution, validates business requirements early, and identifies potential issues before production deployment.

### *Supporting CMS Certification Collaboration*

Because CMS certification is a critical project objective, Conduent works closely with DHHS throughout certification planning, artifact development, requirements traceability, testing, and certification readiness activities. Our certification specialists collaborate directly with State stakeholders to develop evidence, review certification deliverables, and prepare for CMS reviews and demonstrations. This integrated approach strengthens certification readiness and reduces project risk.

### *Promoting Long-Term Partnership*

Conduent views stakeholder collaboration as an ongoing partnership rather than a project activity. Our Medicaid Drug Rebate experts, project leaders, and operational teams remain accessible and engaged throughout implementation and operations. We foster trust through transparency, responsiveness, and shared accountability, creating an environment where stakeholders actively contribute to project success and continuous program improvement.

As a result, DHHS gains a collaborative delivery model that accelerates decision-making, improves solution quality, strengthens stakeholder buy-in, and supports CMS certification activities. This approach drives the successful implementation of a modern Medicaid Drug Rebate System while building organizational alignment and confidence throughout the project lifecycle.

## VI.A.2.I.c.1 Work Plan [RFP V.H.1]

**REQUIREMENT: RFP Section V.H.1 pg. 64**

The vendor shall designate a dedicated project team, including project managers, business analysts, sponsors, and key stakeholders, who will collaborate with the State throughout the project lifecycle. IMPORTANT NOTE: When designating the project team, the Vendor must select and resource subject matter experts proficient in the Drug Rebate domain.

1. Work Plan (RFP, pg. 65)

Provide a general work plan for approaching the project requirements outlined herein Section (V) and provide assurances in your ability to meet all requirements as outlined and avert delays.

a. The Vendor shall include detailed certification tasks, milestones and deliverables in the project workplan as directed by the State.

***Conduent executes a fully integrated, mature CMS-certifiable DHHS Medicaid Drug Rebate (MDR) System using a proven, disciplined work plan.***

## General Work Plan and CMS Certification Approach

Conduent executes the MDR System using an established and disciplined implementation methodology that combines modern system delivery practices, comprehensive project governance, and deep Medicaid Drug Rebate Program (MDRP) expertise. Our approach aligns with the requirements defined in Section V of the RFP and leverages more than 25 years of Medicaid drug rebate administration experience, successful Medicaid system implementations, and CMS certification achievements across multiple states.

We understand that DHHS seeks more than a technology replacement. Nebraska requires a fully integrated, CMS-certifiable MDR solution that modernizes rebate operations, supports federal and state compliance requirements, improves manufacturer engagement, enhances financial accountability, and provides a sustainable platform for future program growth. Our CMdS Rebate Administration solution implementation strategy addresses each of these objectives through a structured, milestone-driven work plan that embeds certification readiness, quality assurance, risk management, and stakeholder engagement throughout the project lifecycle.

**Unmatched Commitment to Success**

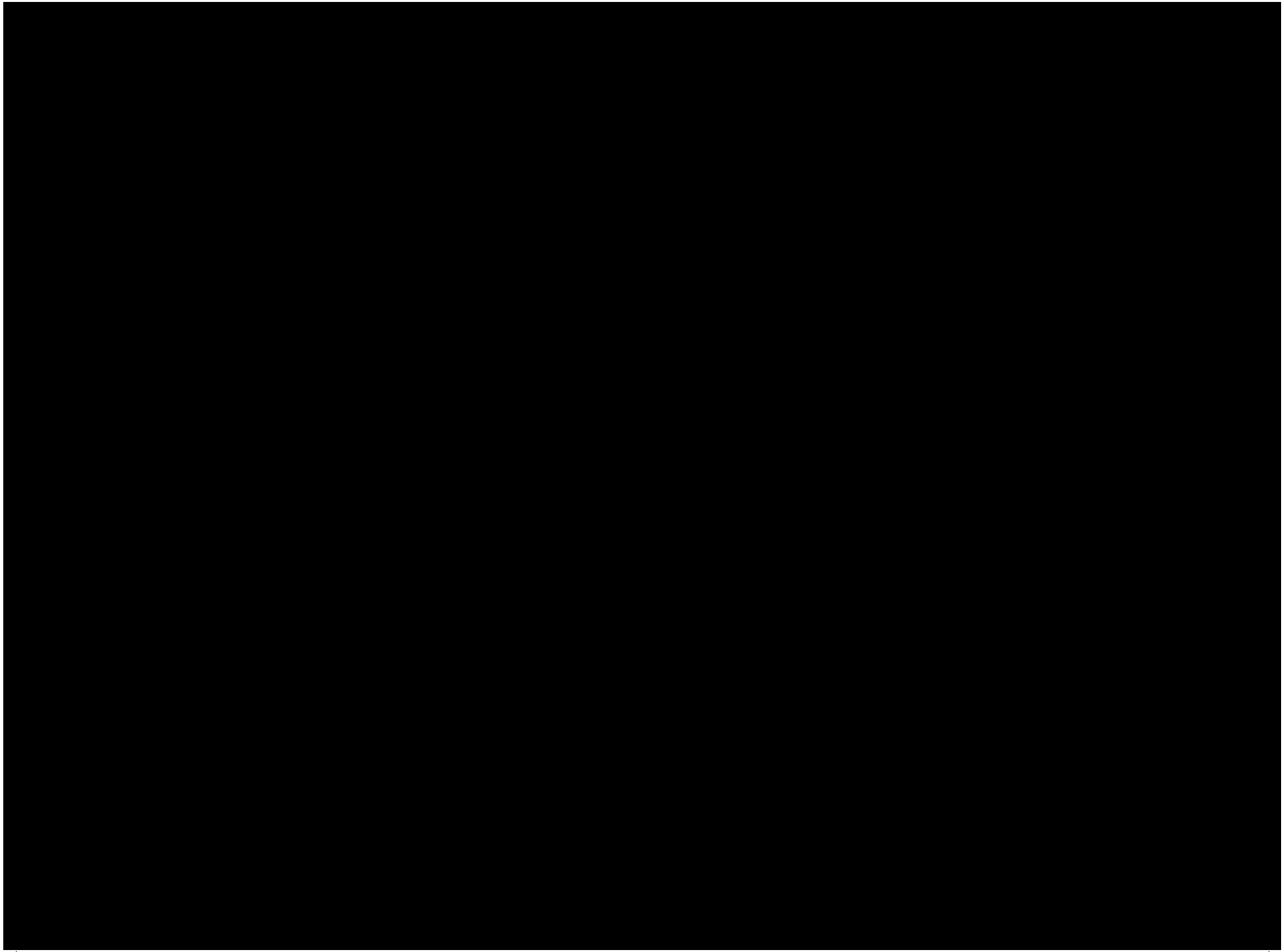
Conduent has a unique combination of Medicaid rebate expertise, proven implementation methodologies, and certified technology capabilities.

We currently:

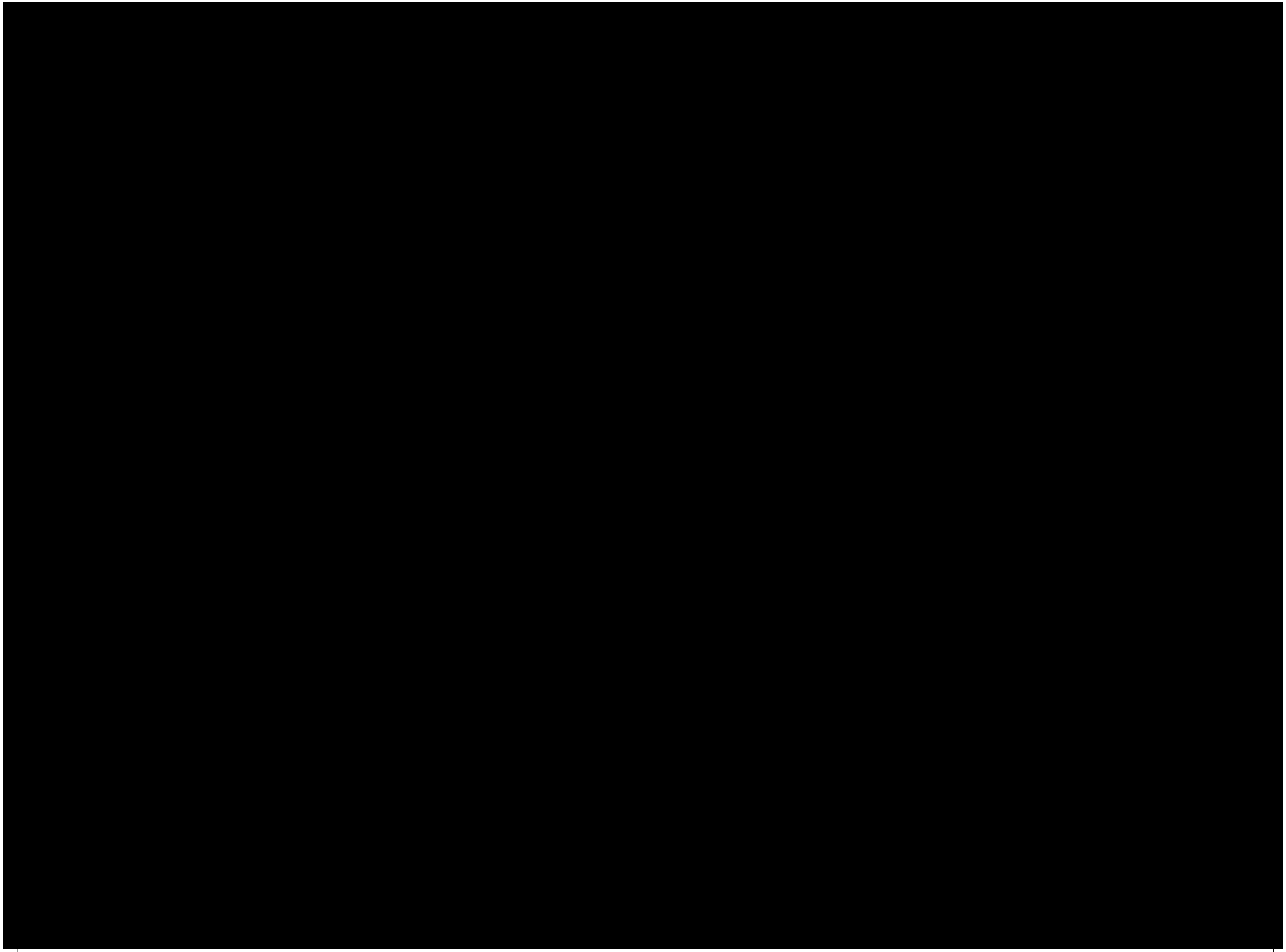
- Collect approximately $5 billion annually in federal and supplemental rebates
- Support multiple Medicaid agencies nationwide
- Have never missed a CMS-required rebate administration deadline

Our Work Plan is detailed below, which includes certification tasks, milestones and deliverables in the project workplan as interpreted.

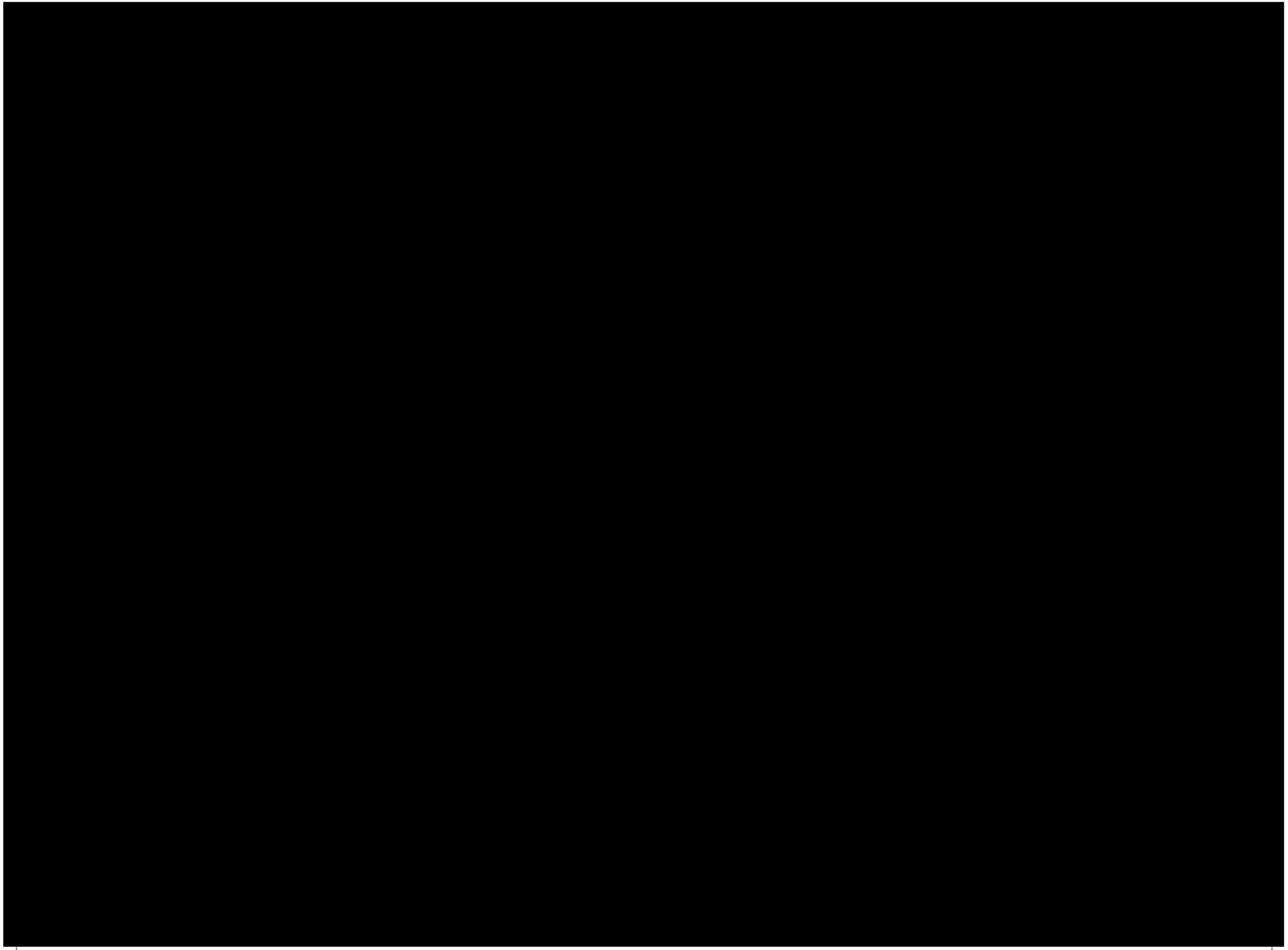
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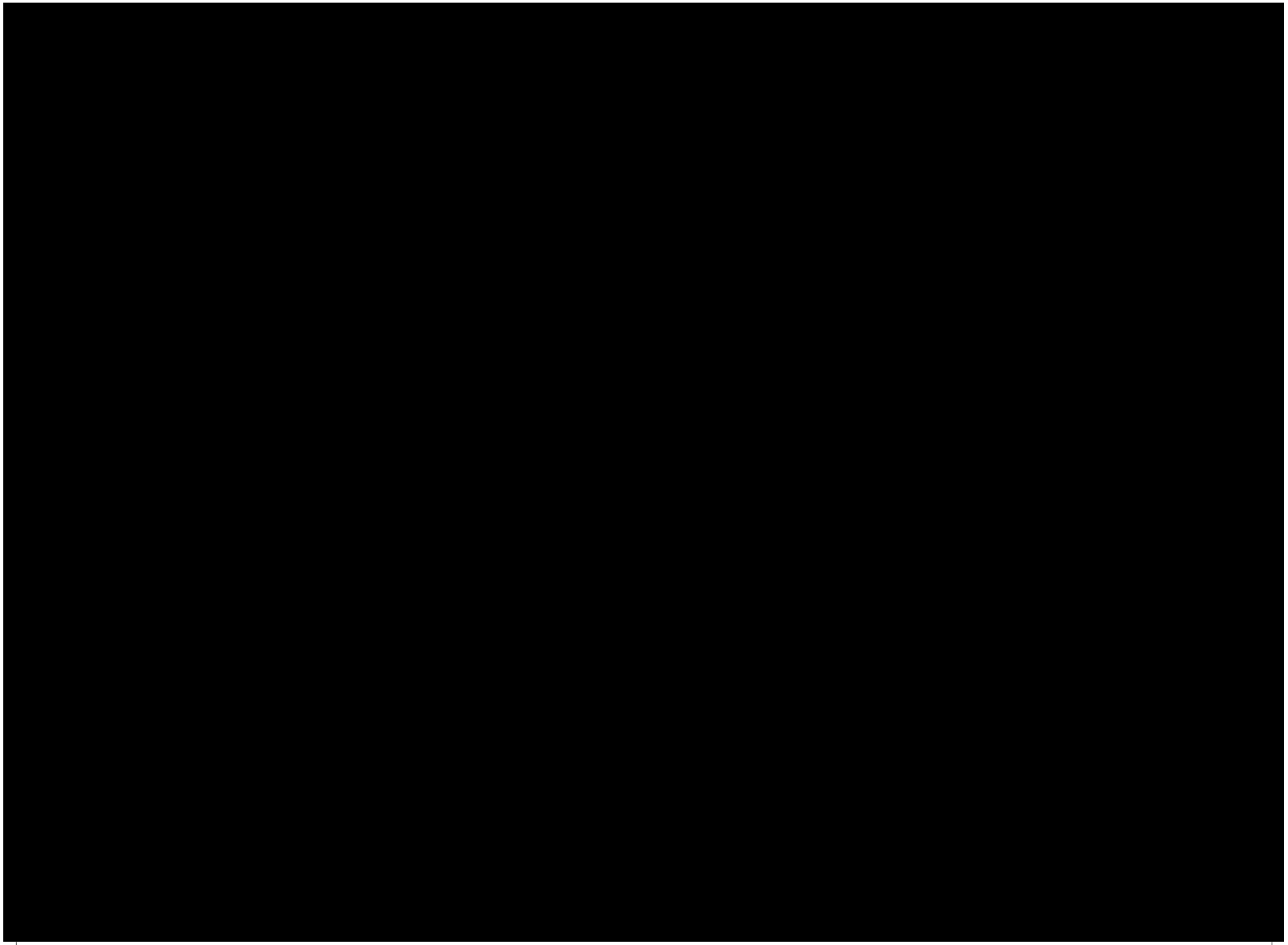


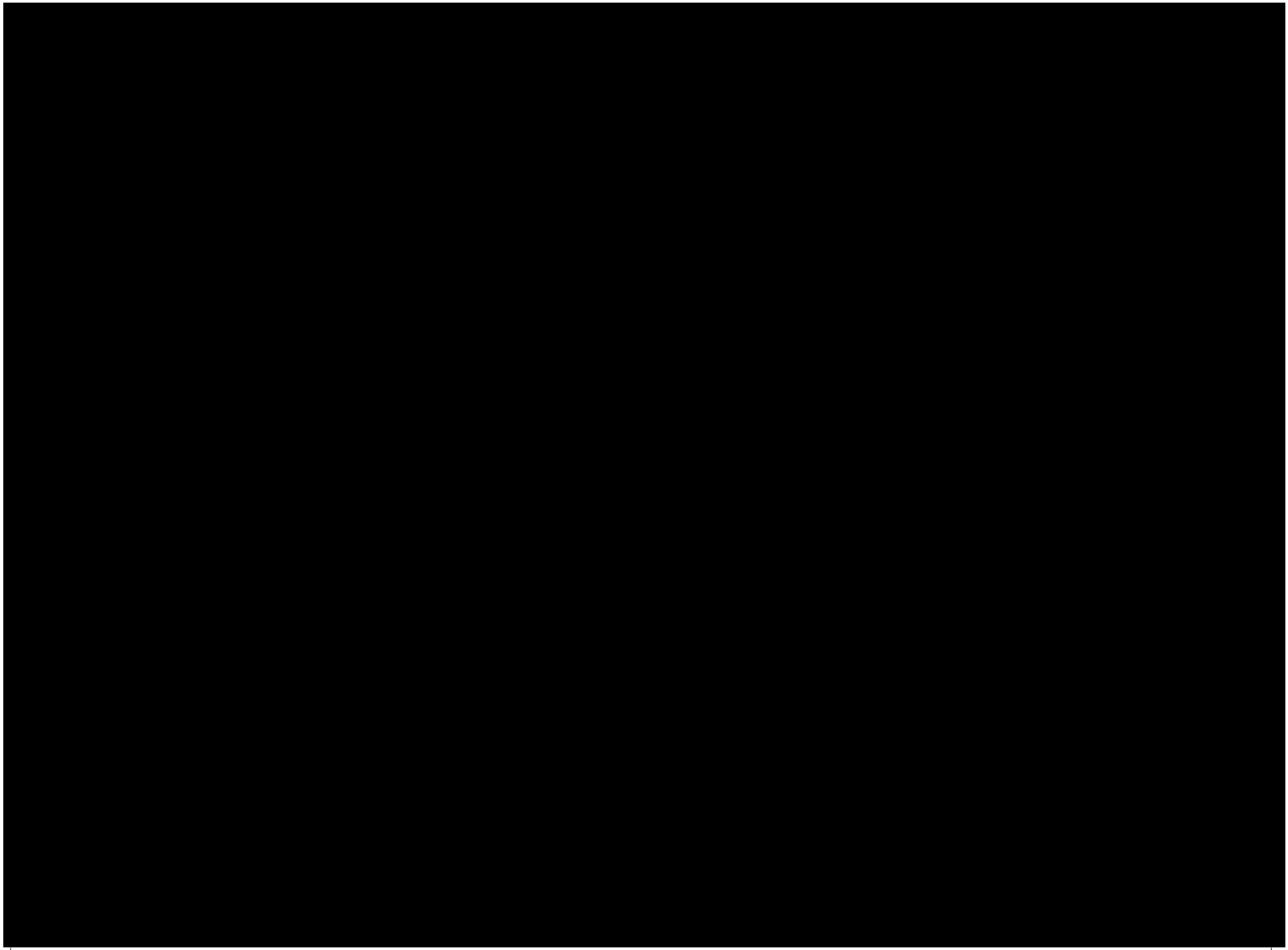
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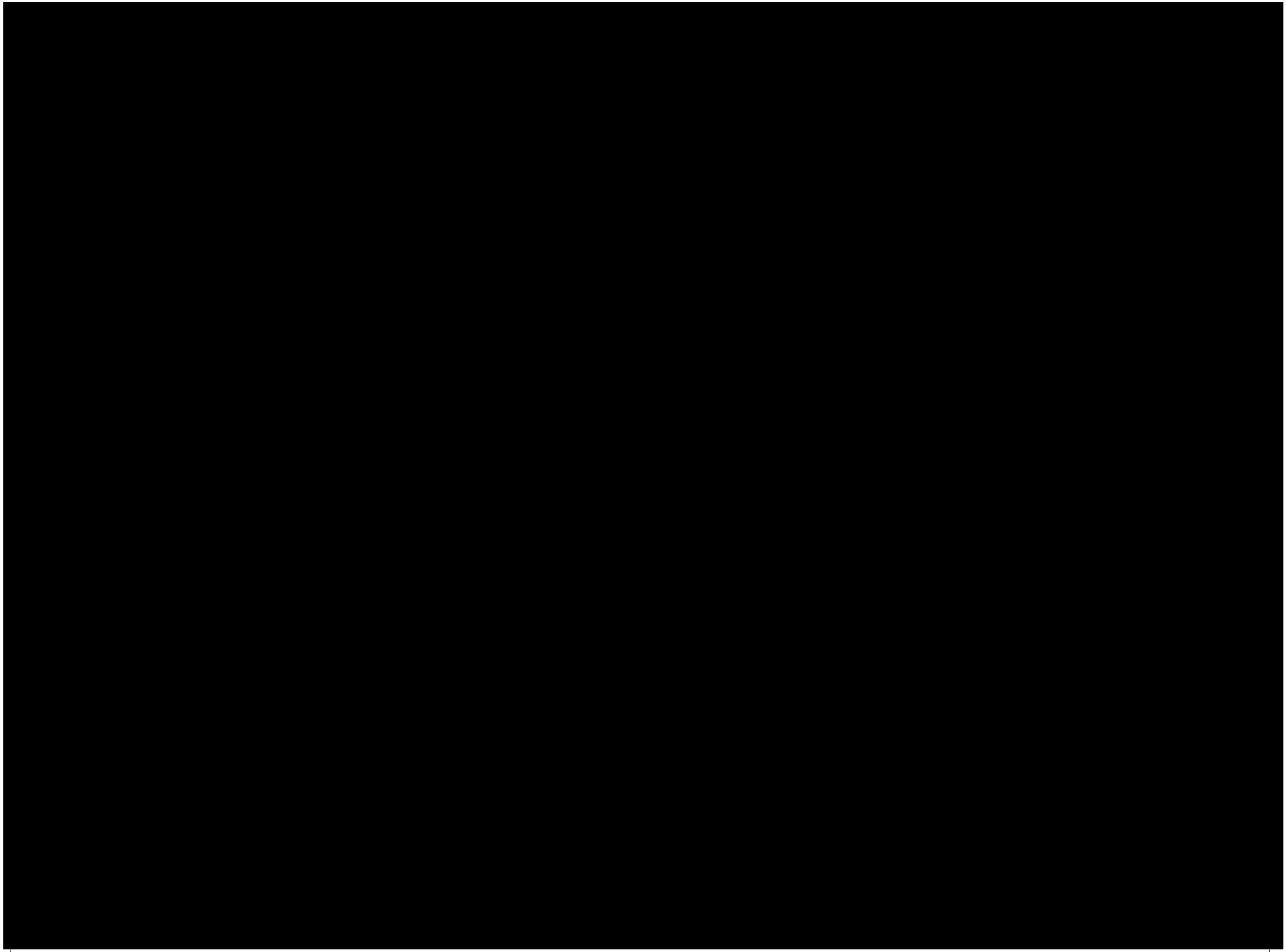




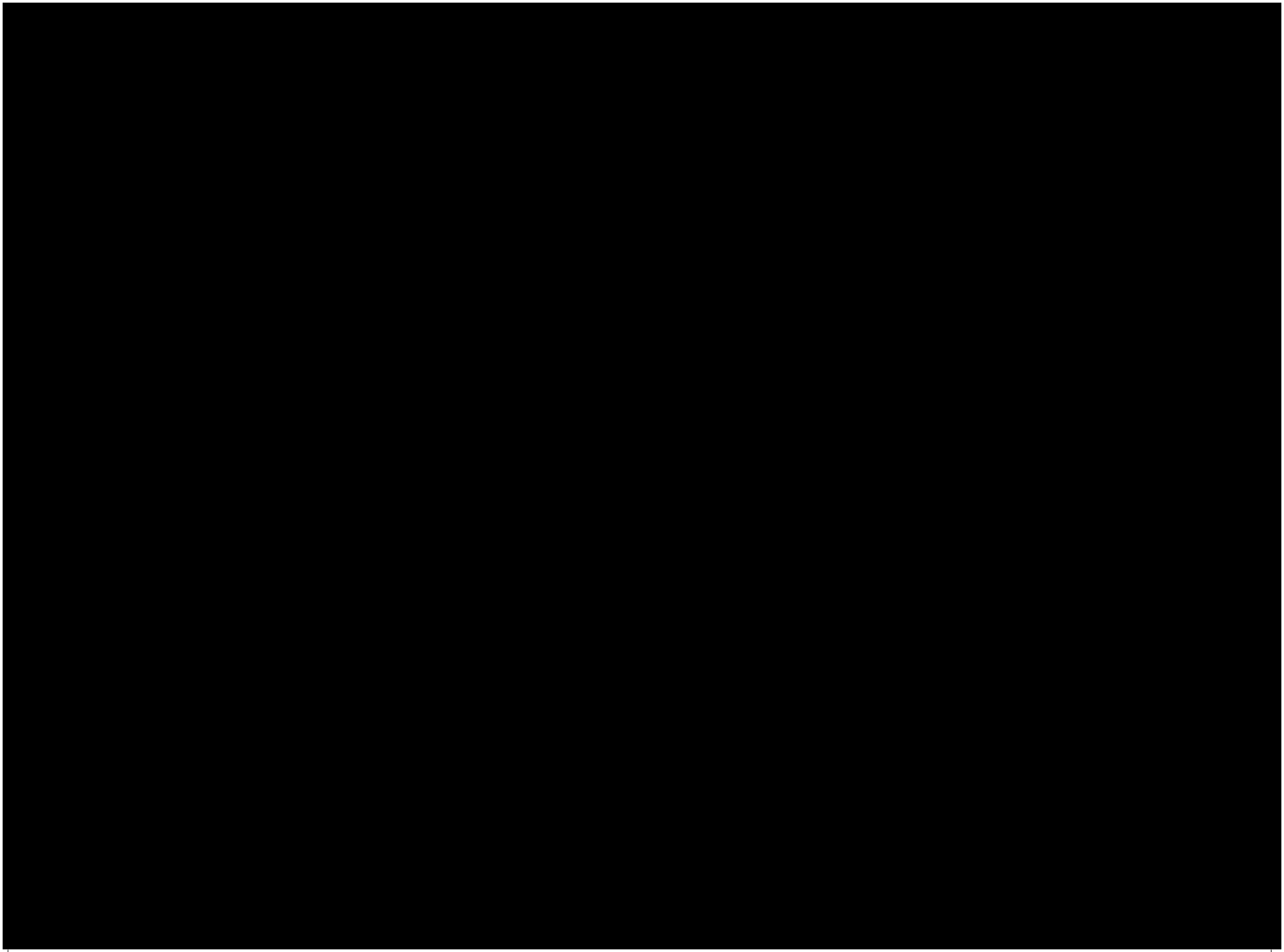






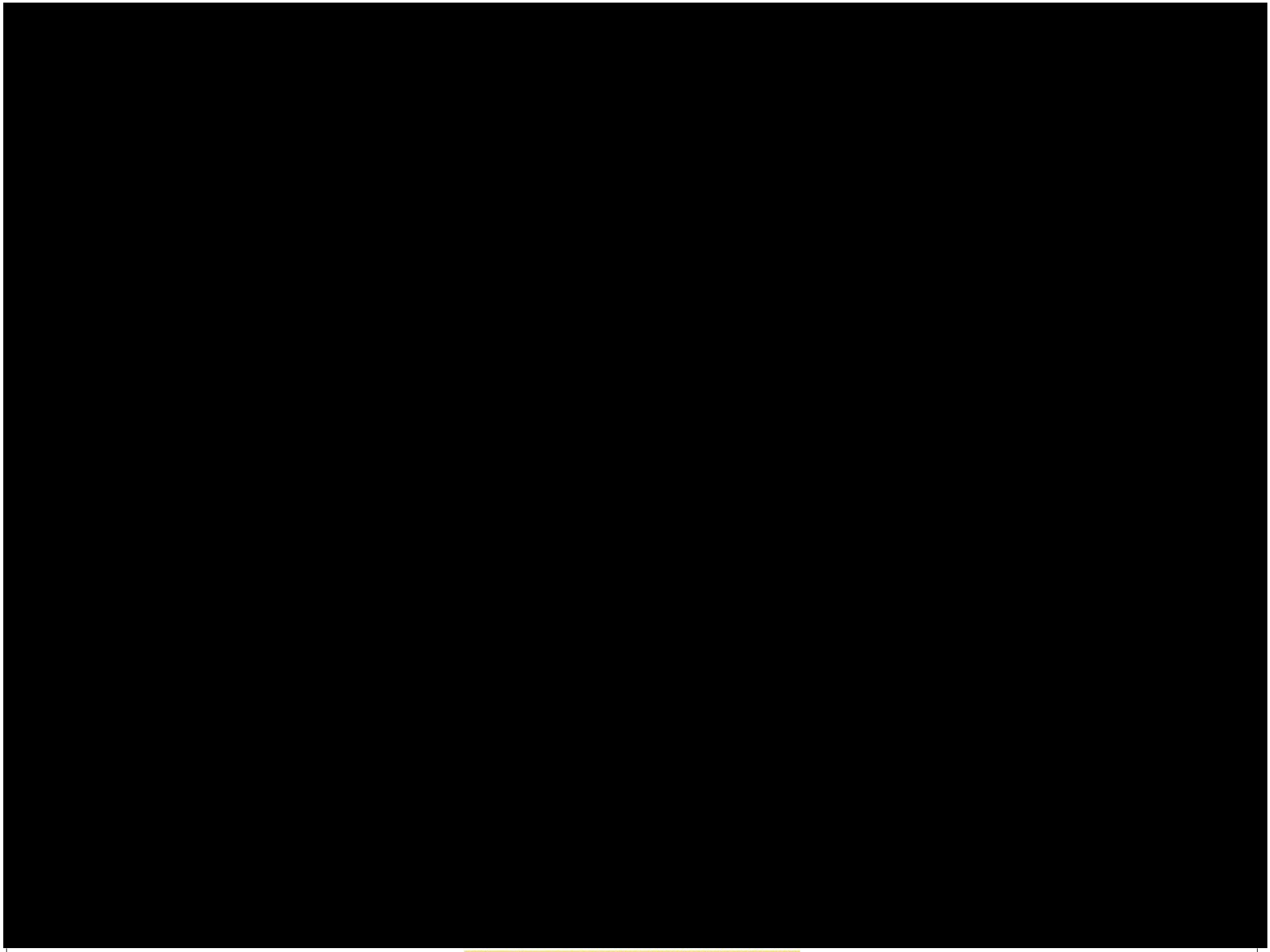


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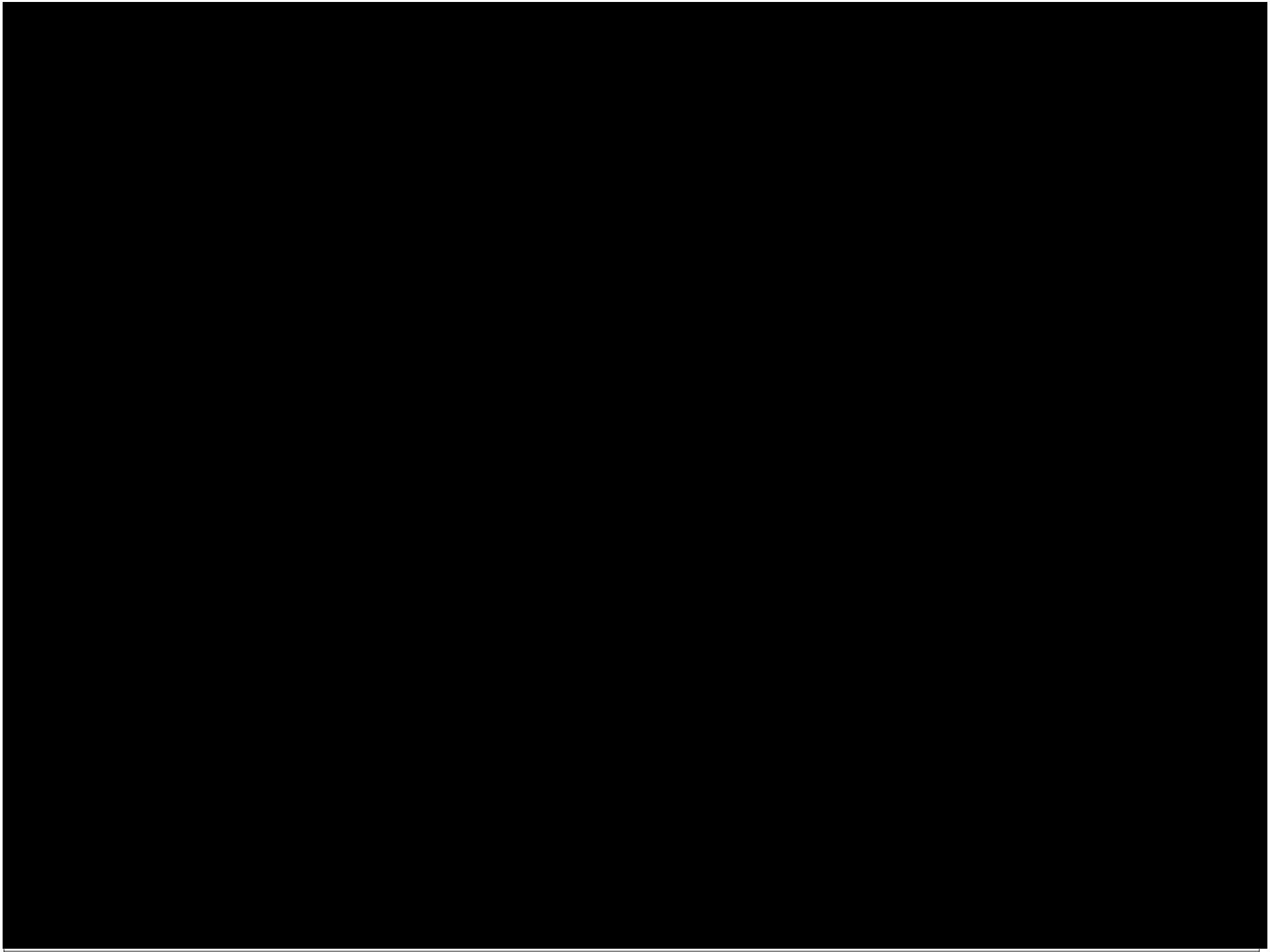


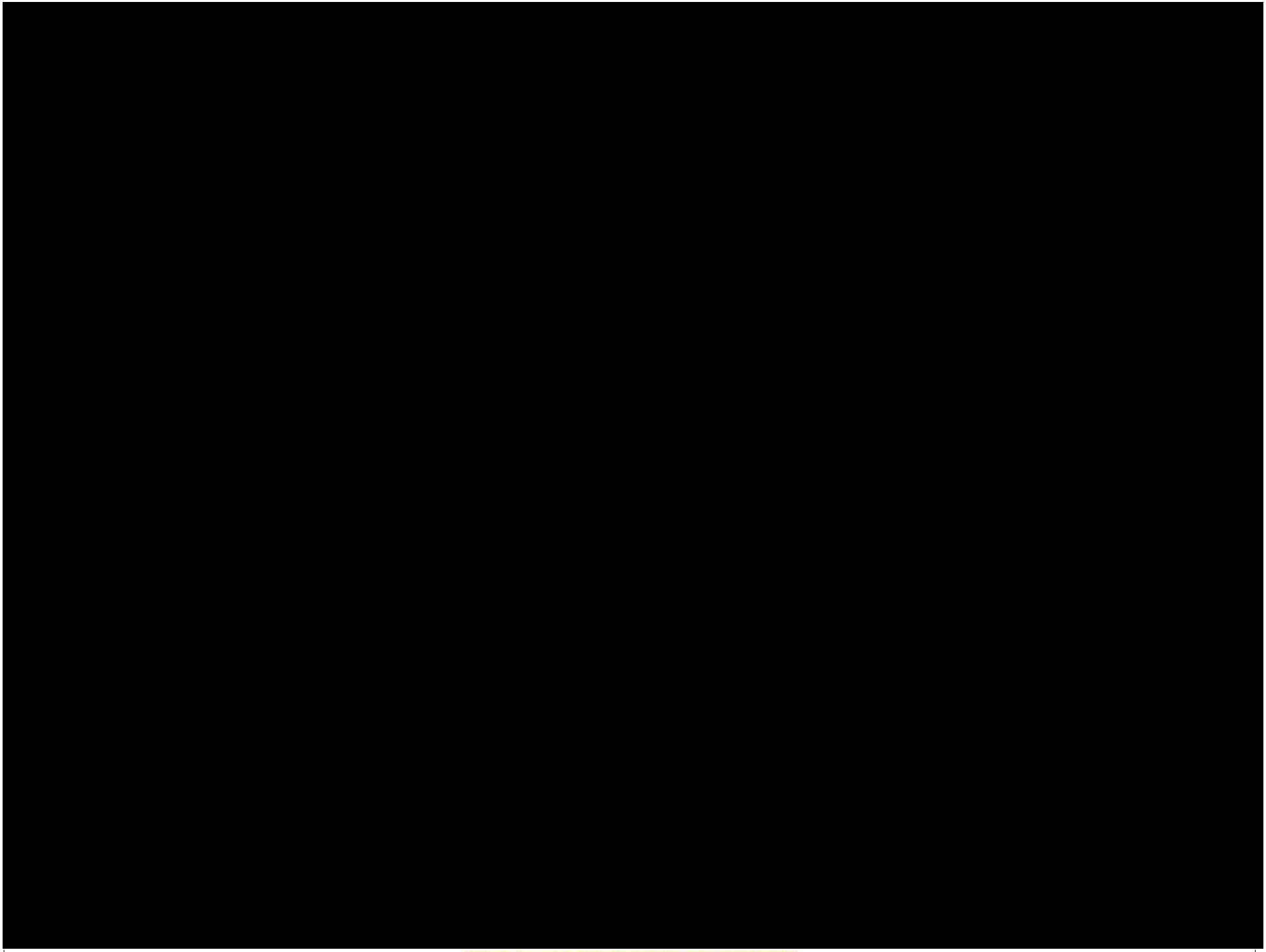
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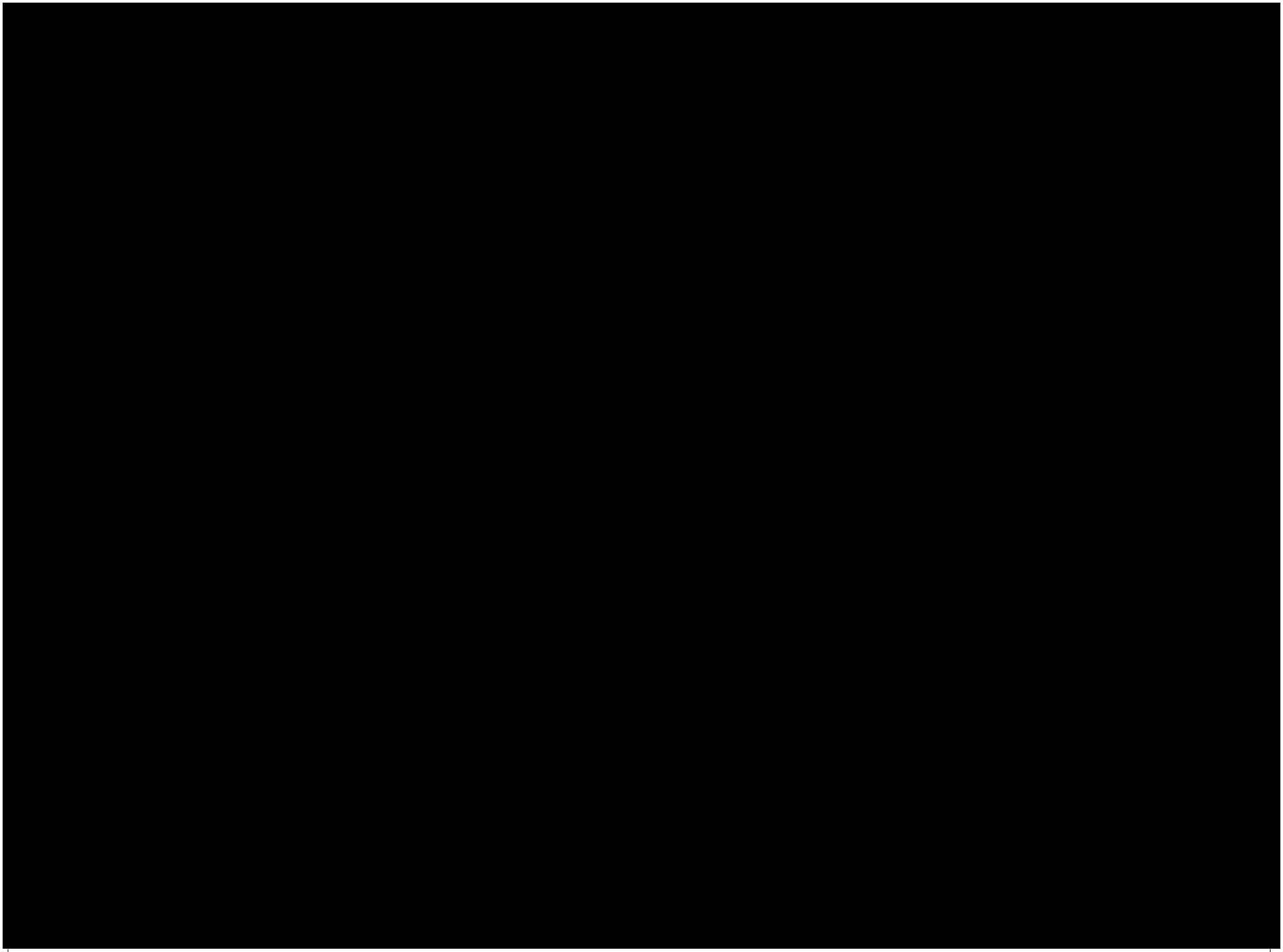


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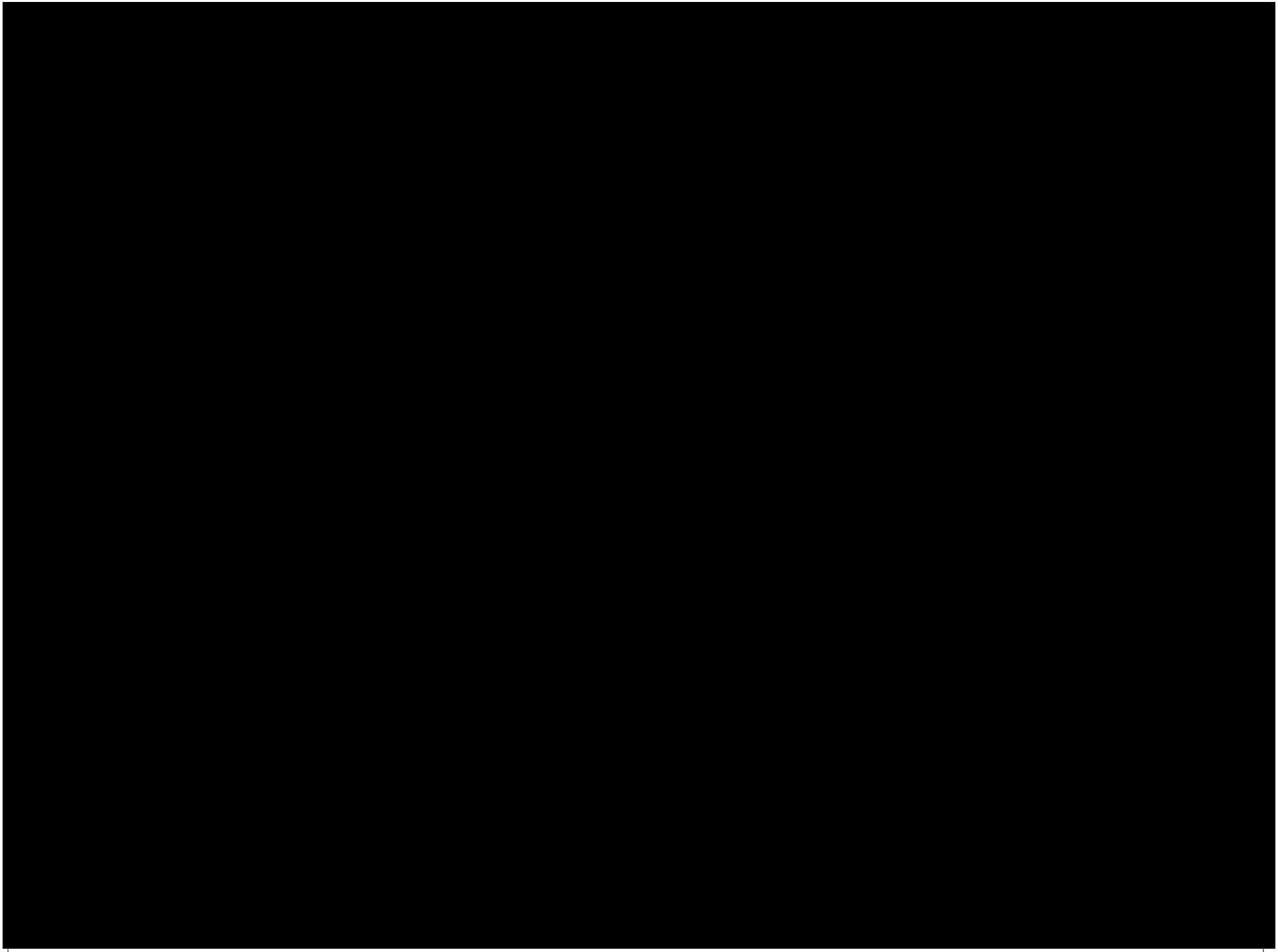


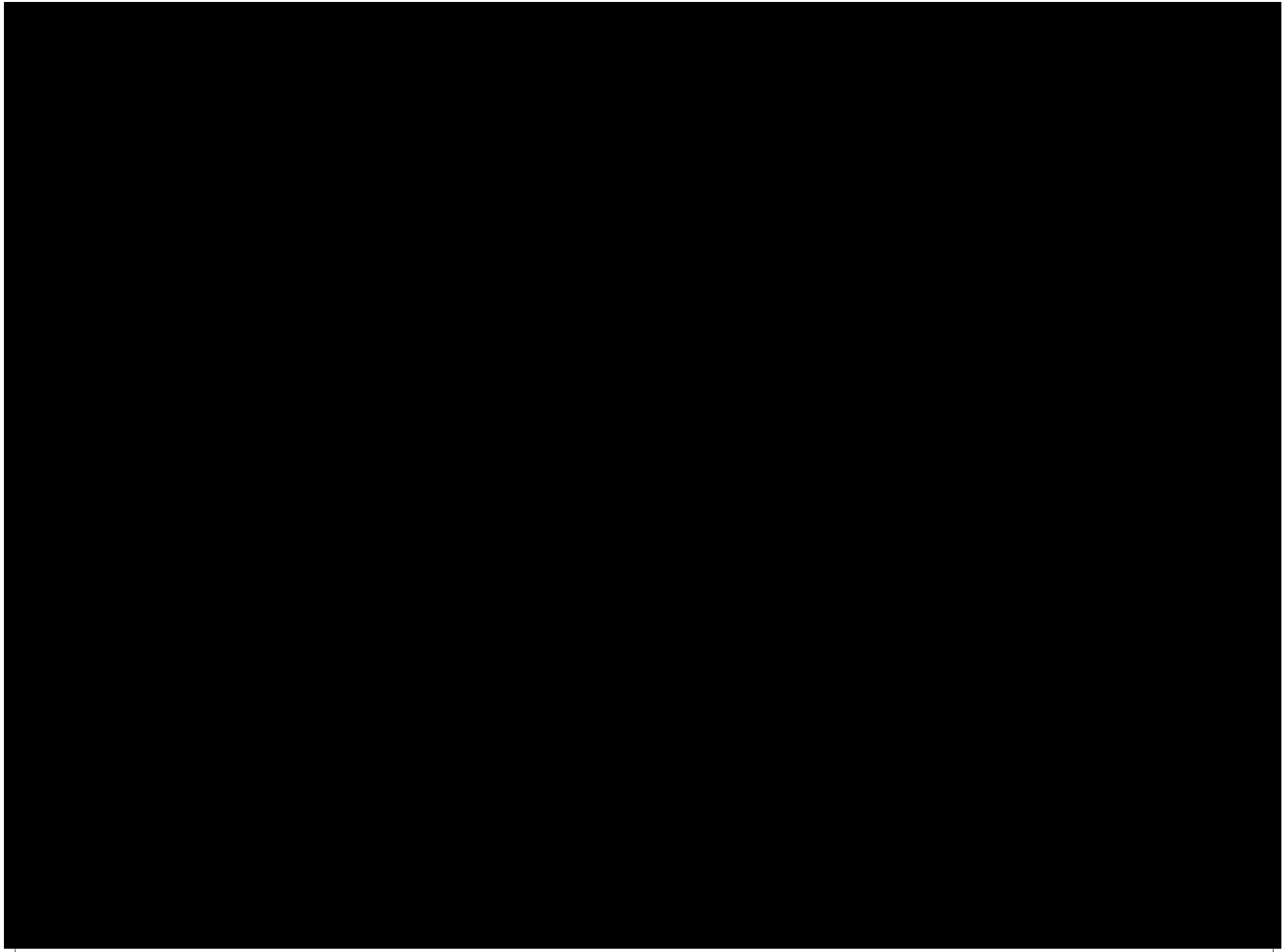


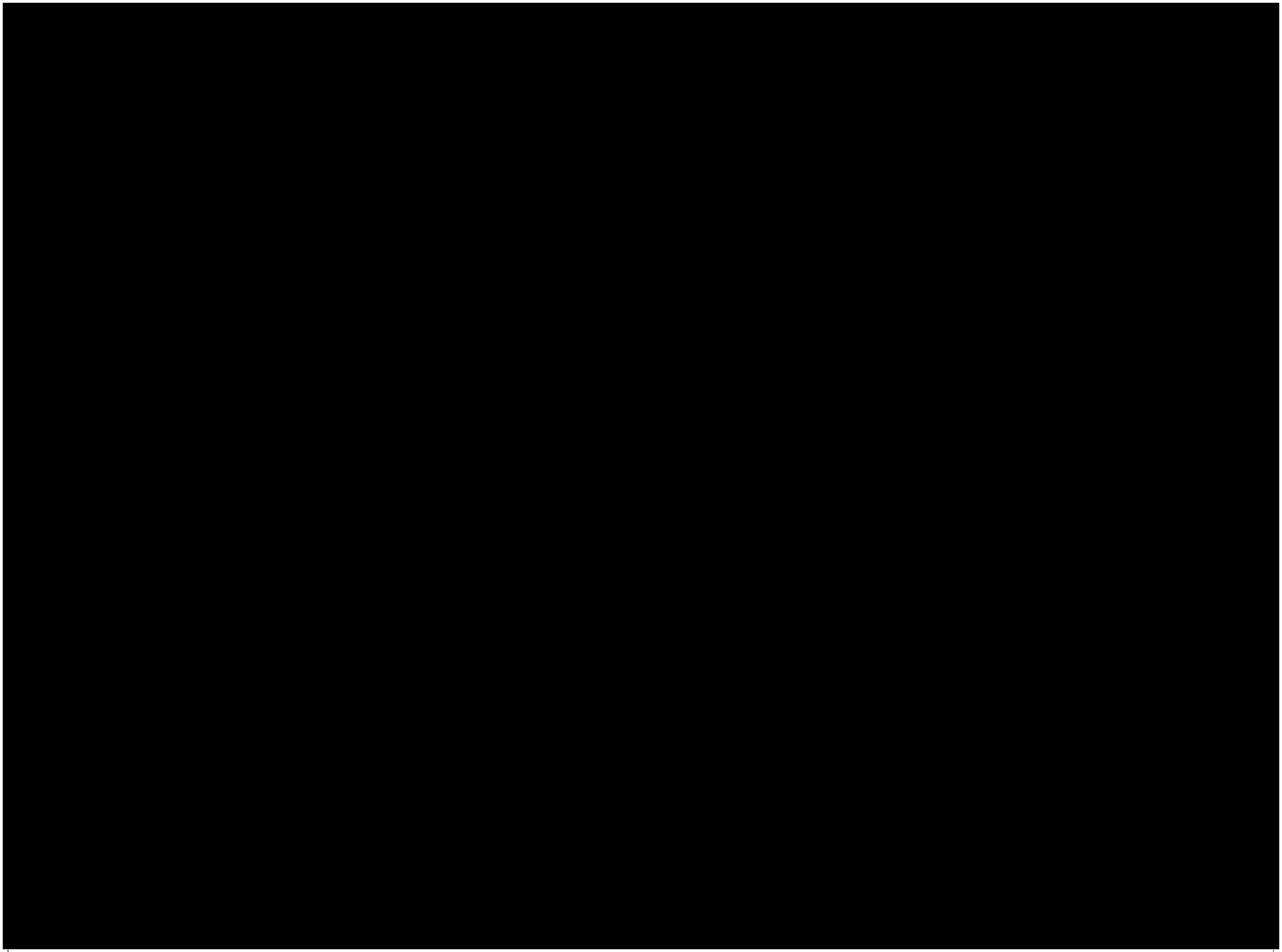
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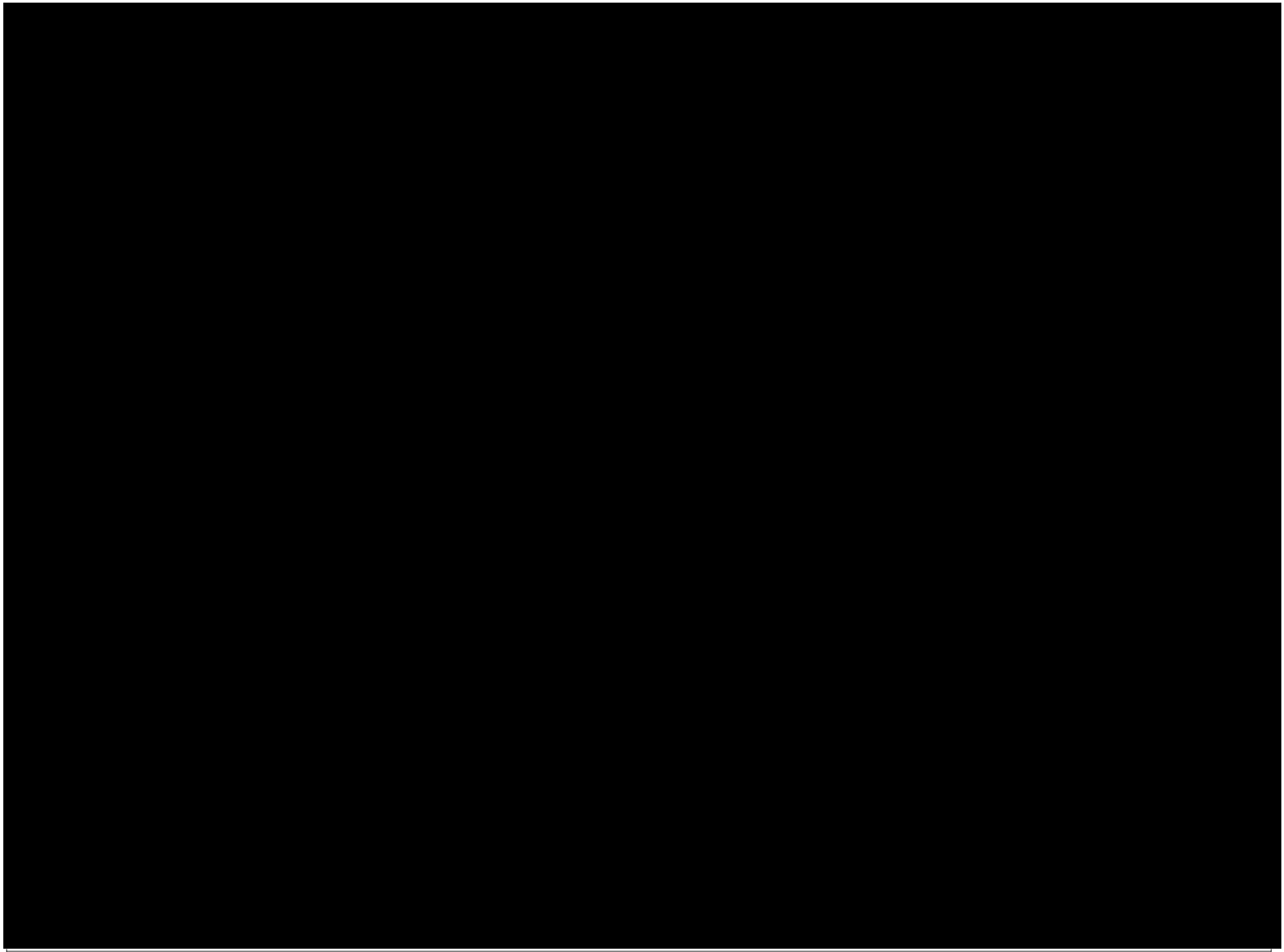








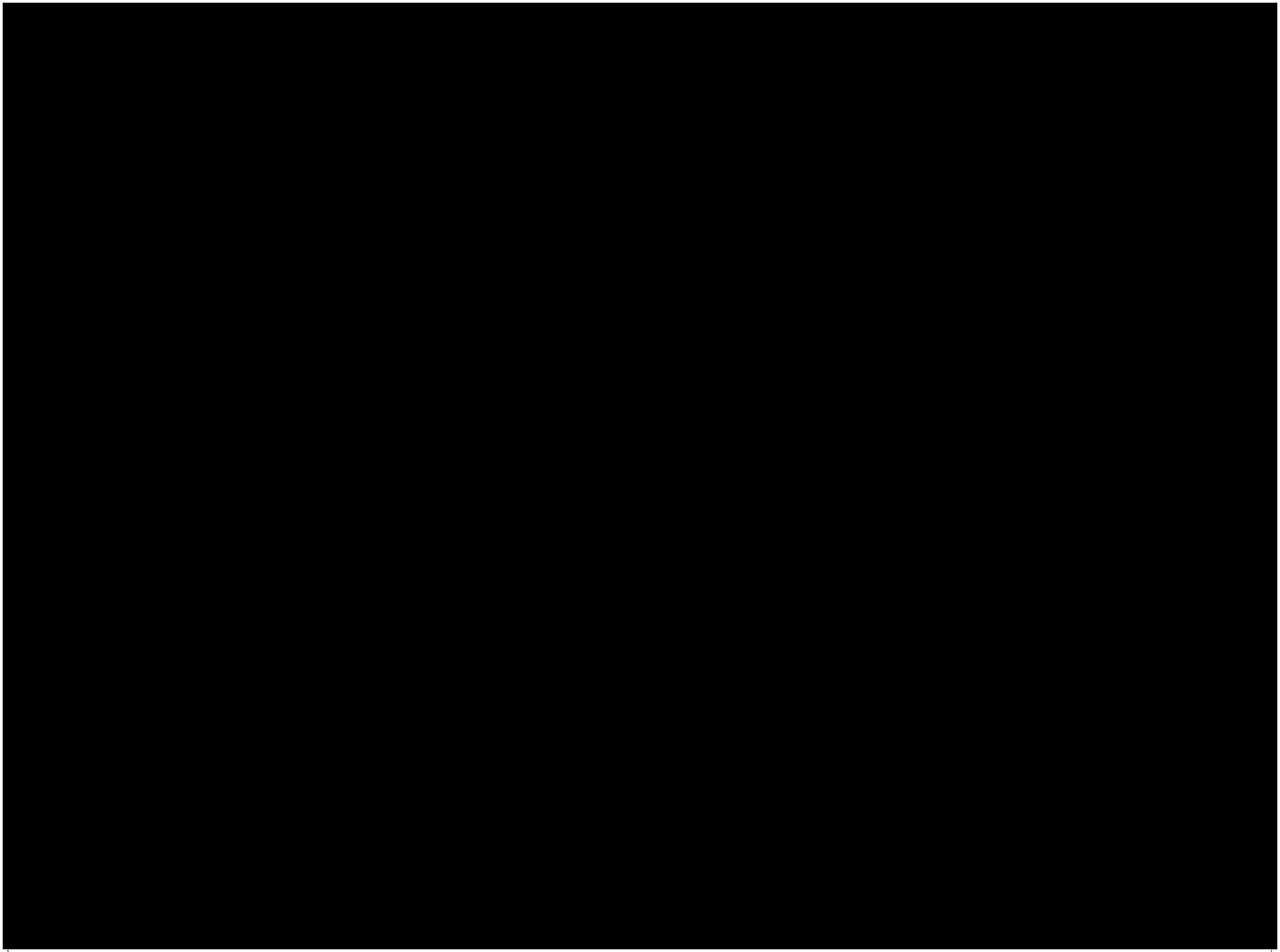


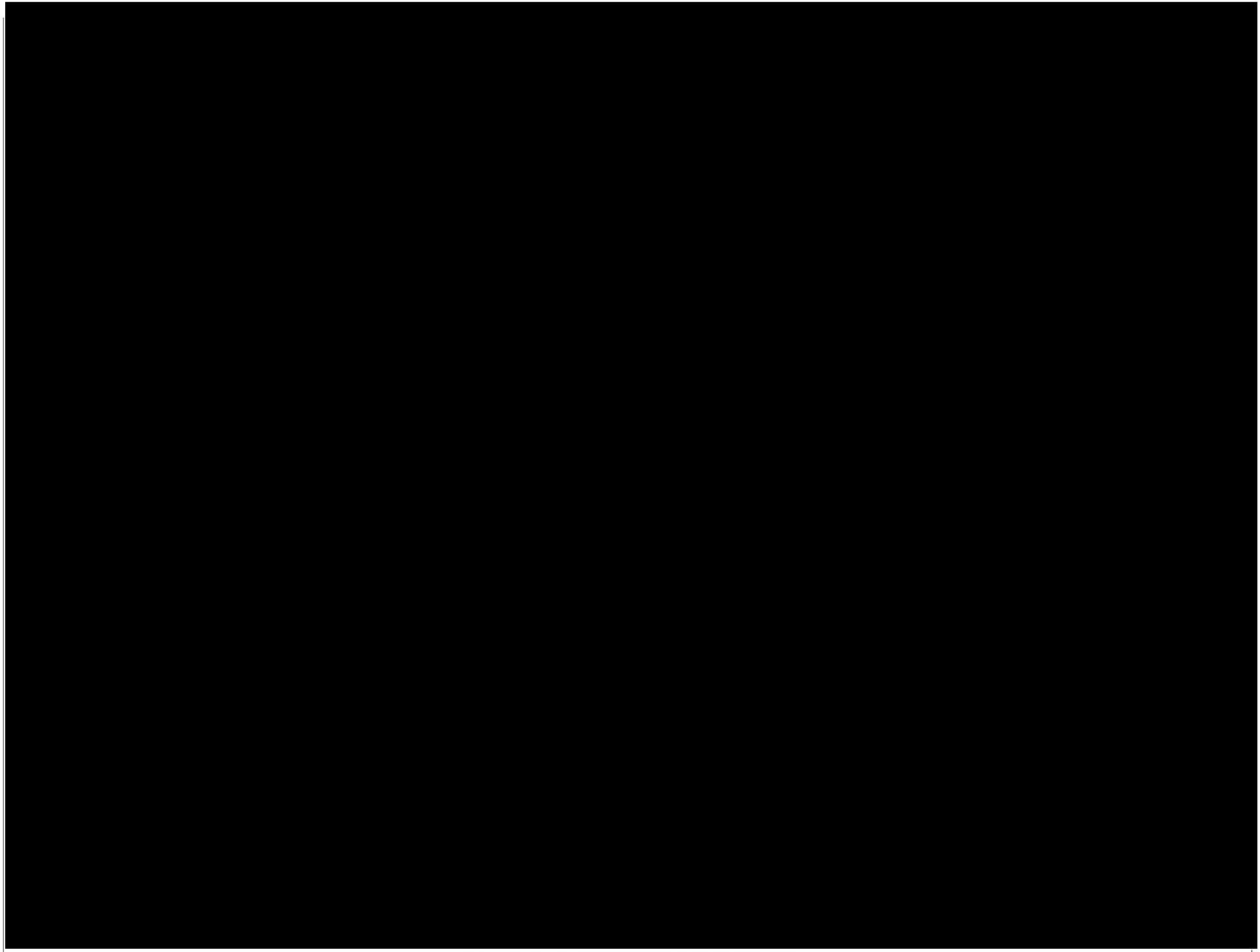


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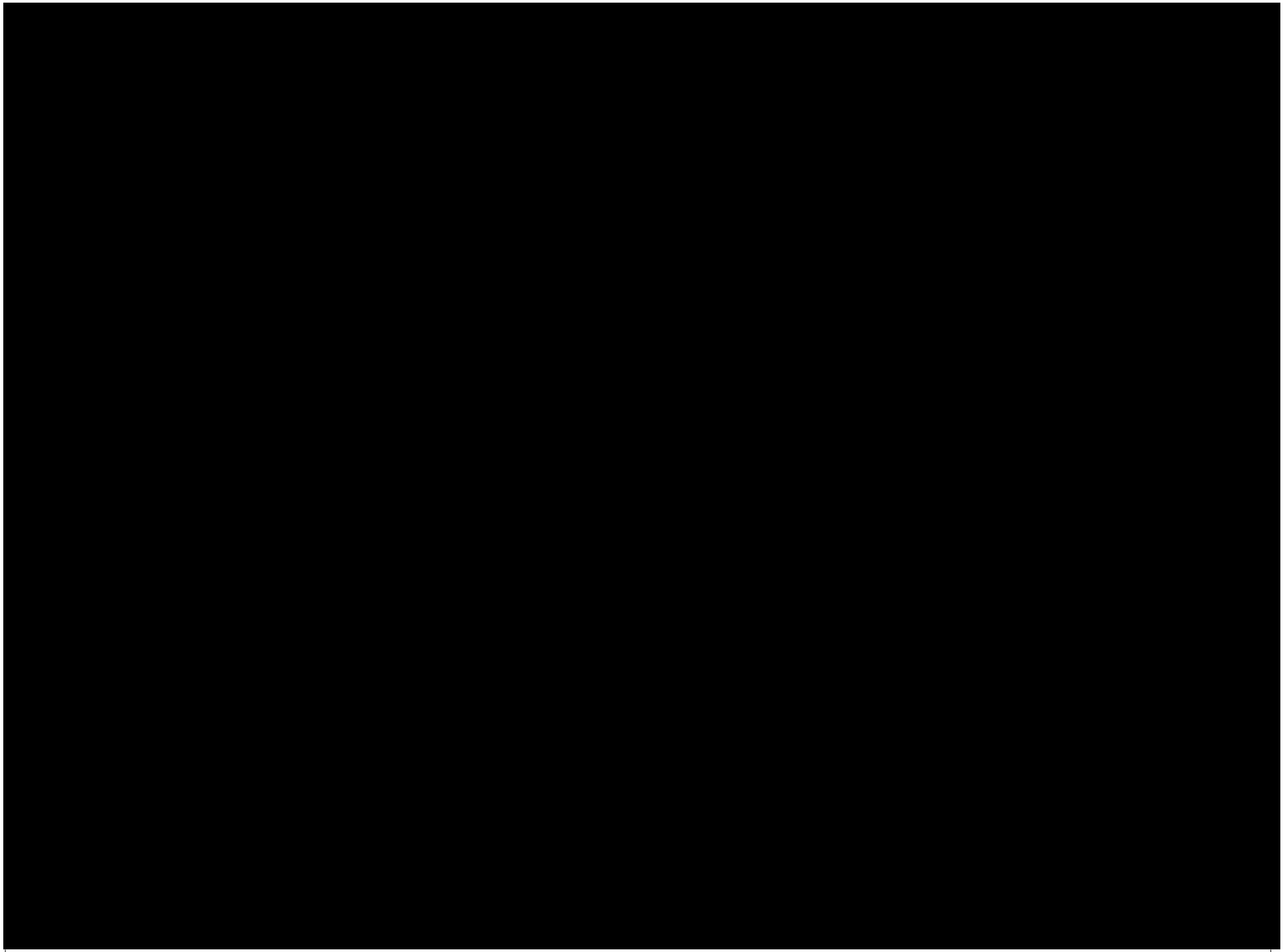
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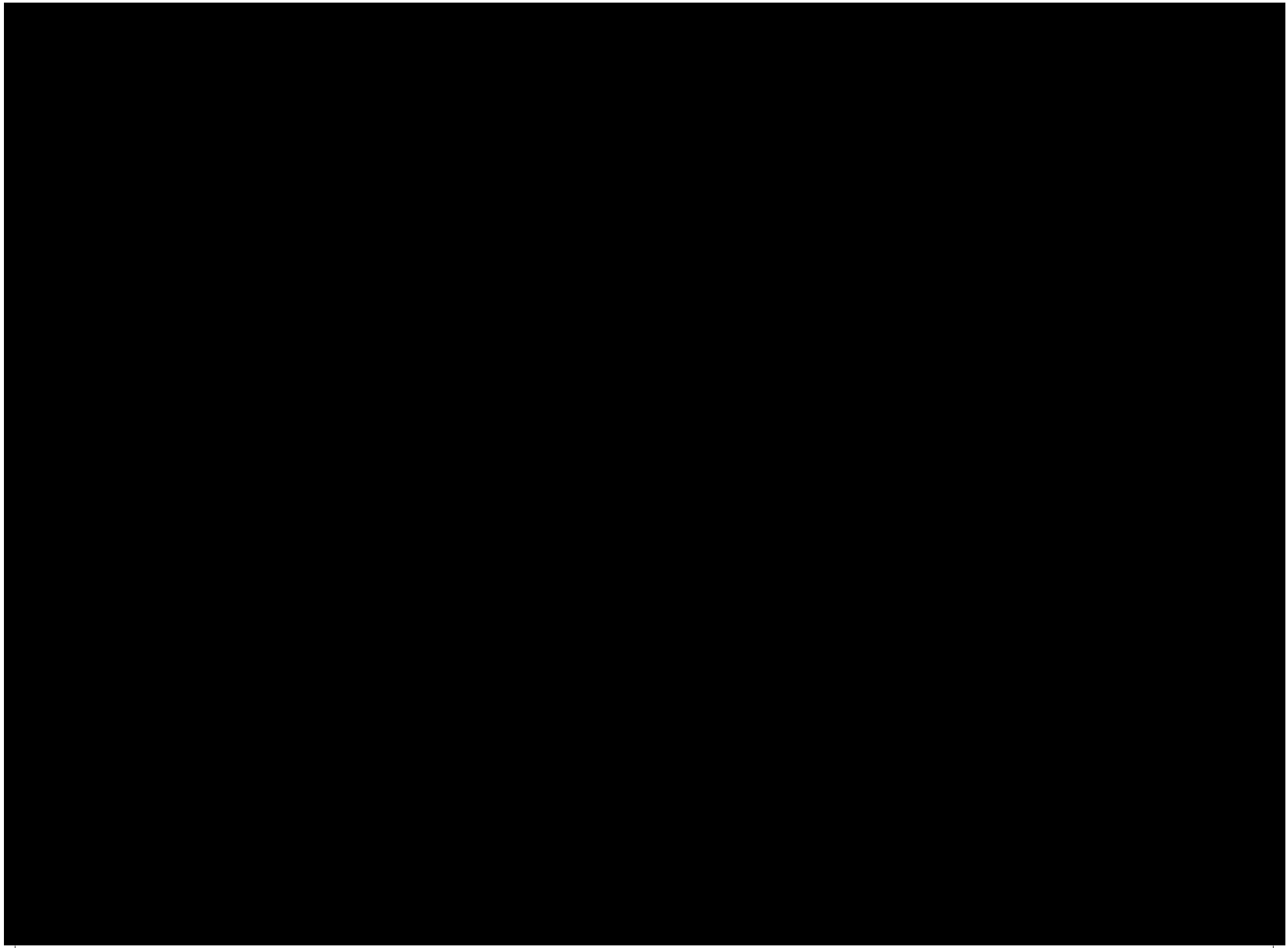


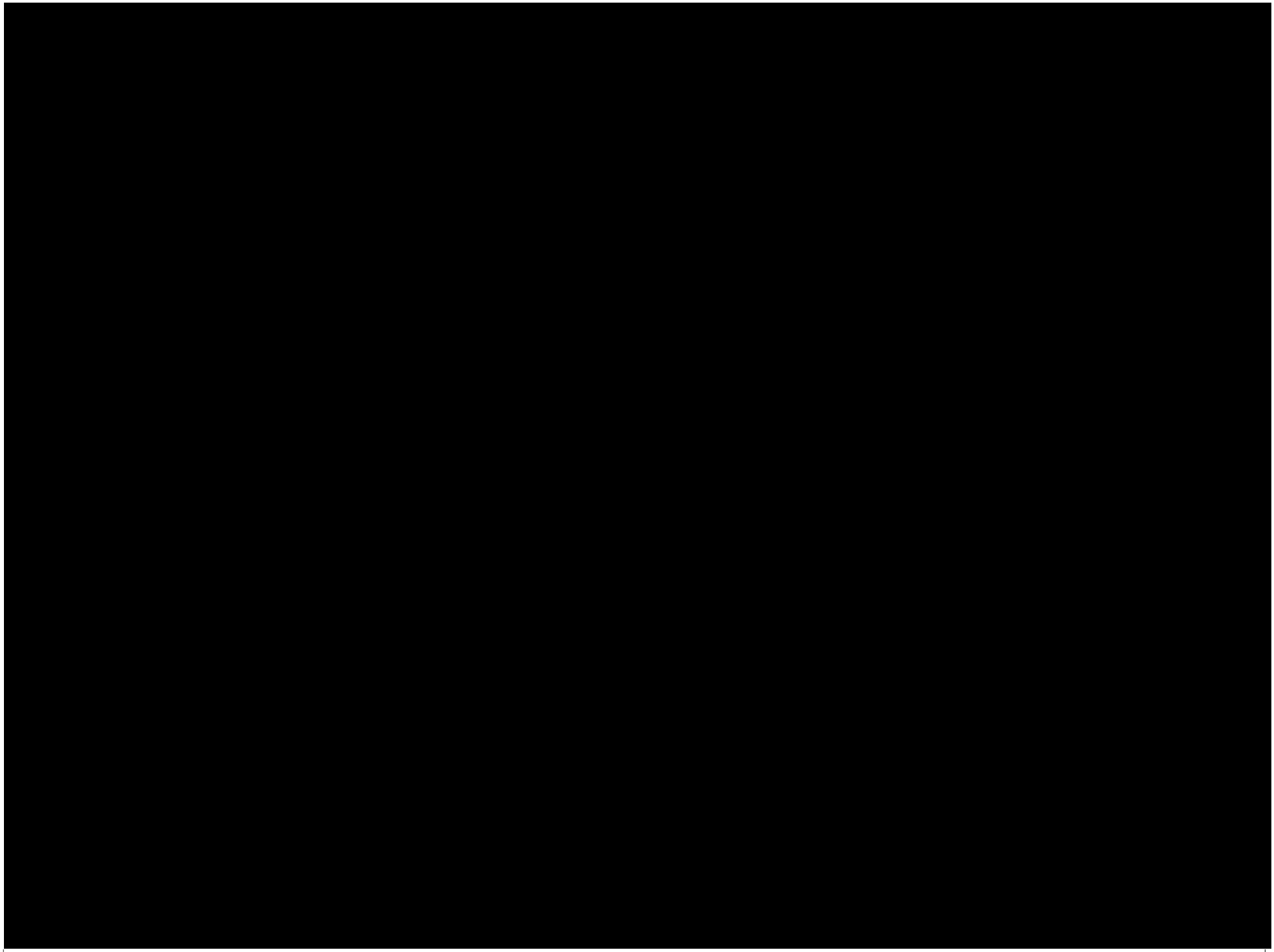




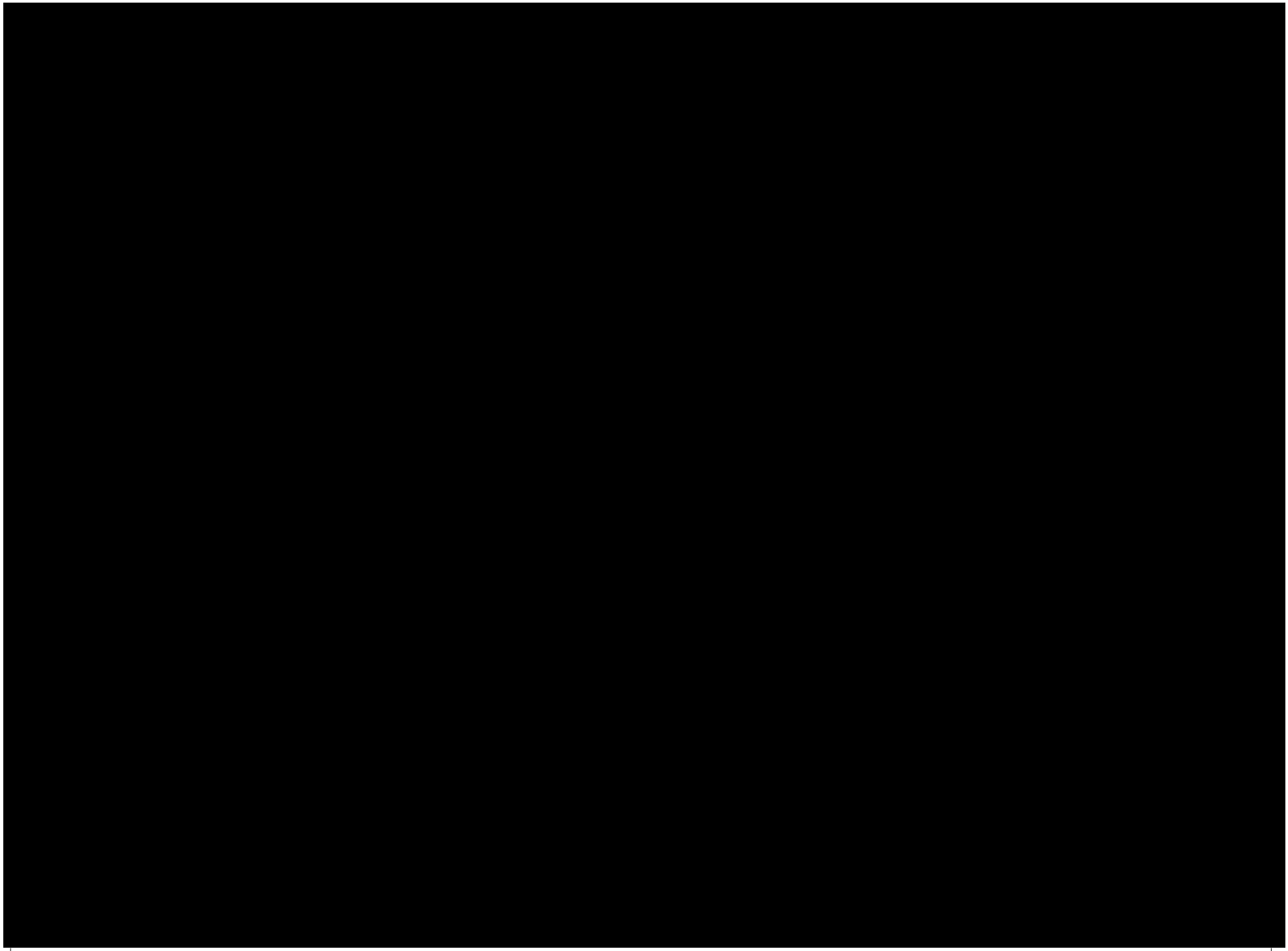
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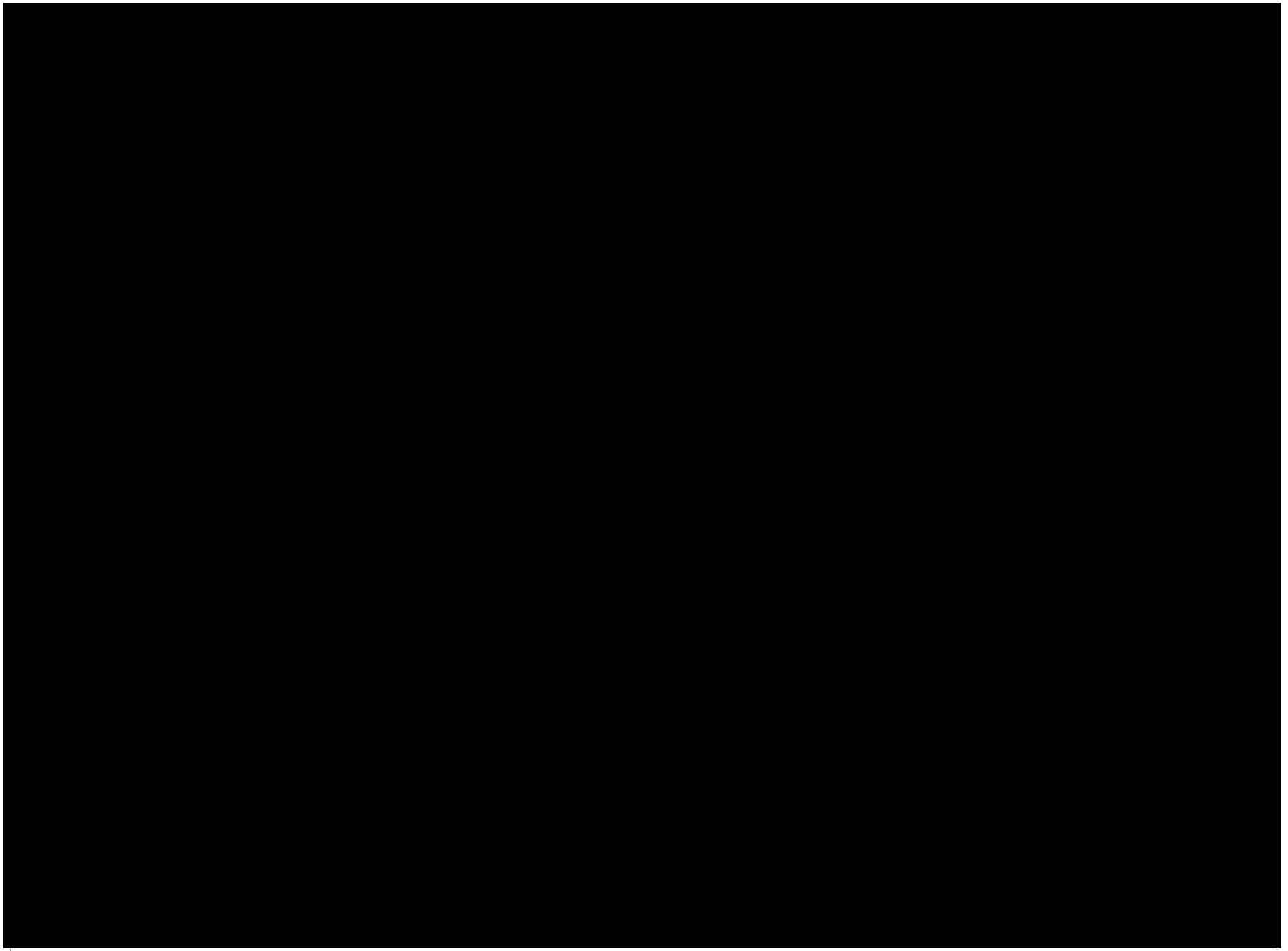




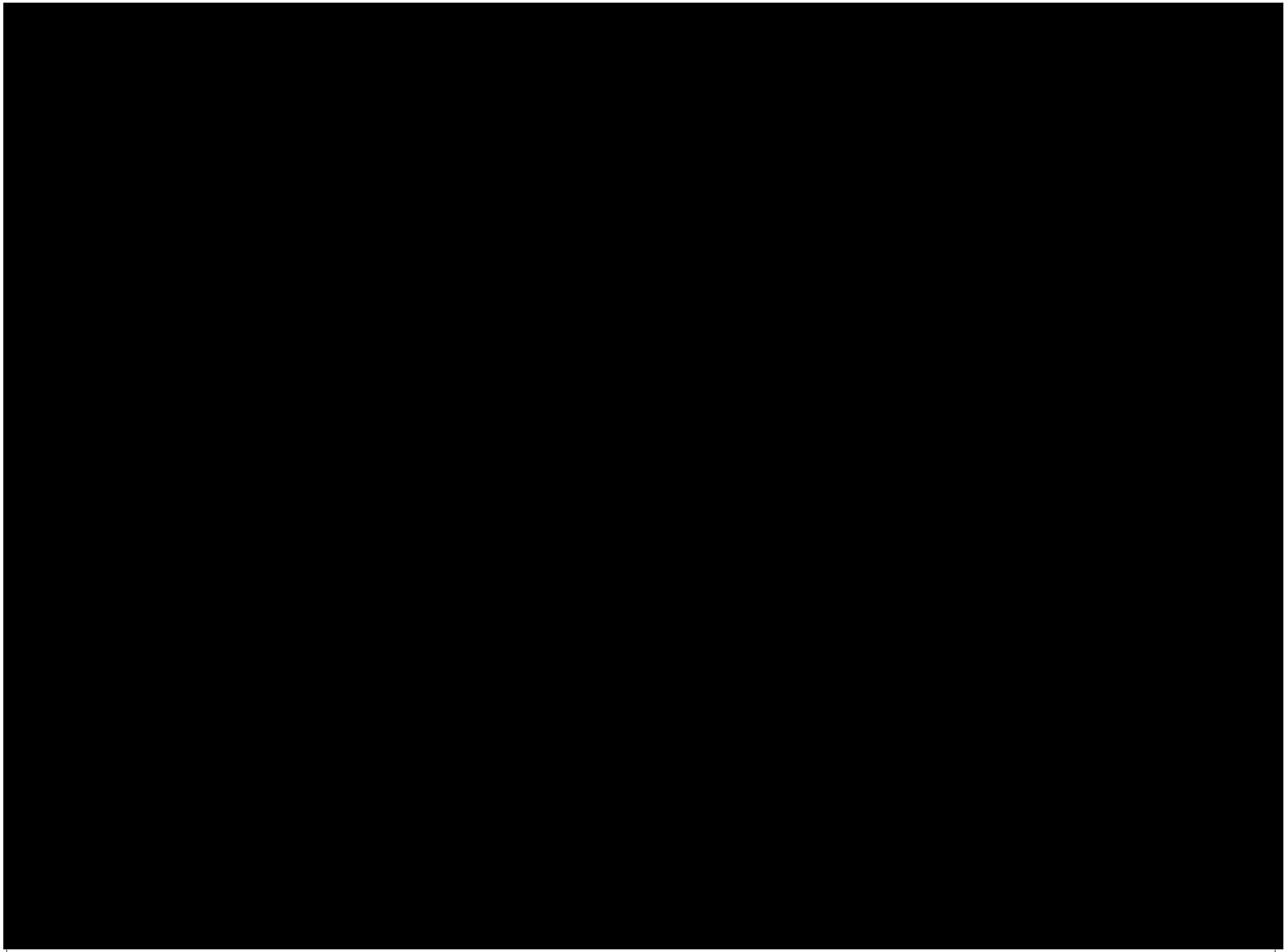


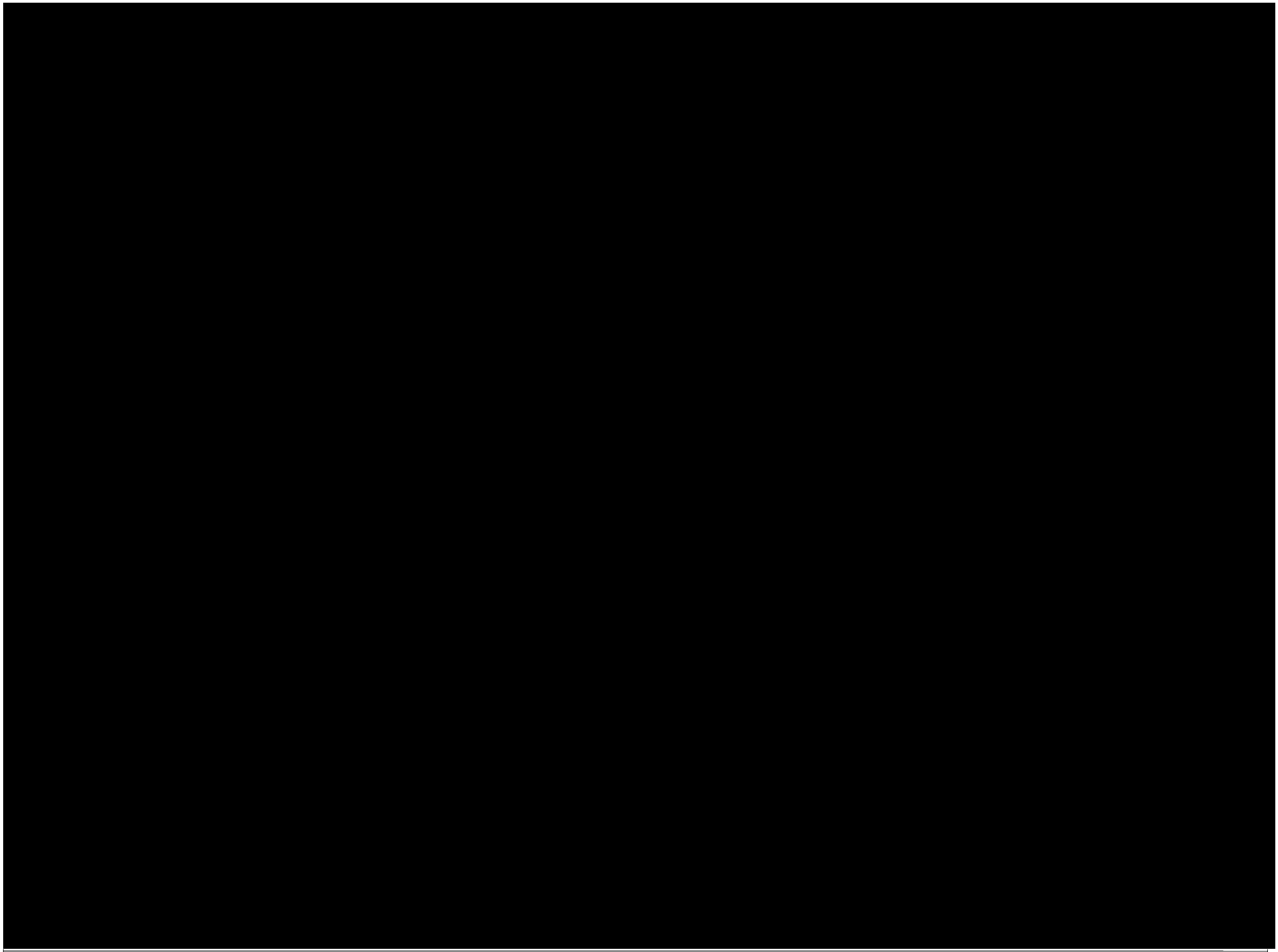
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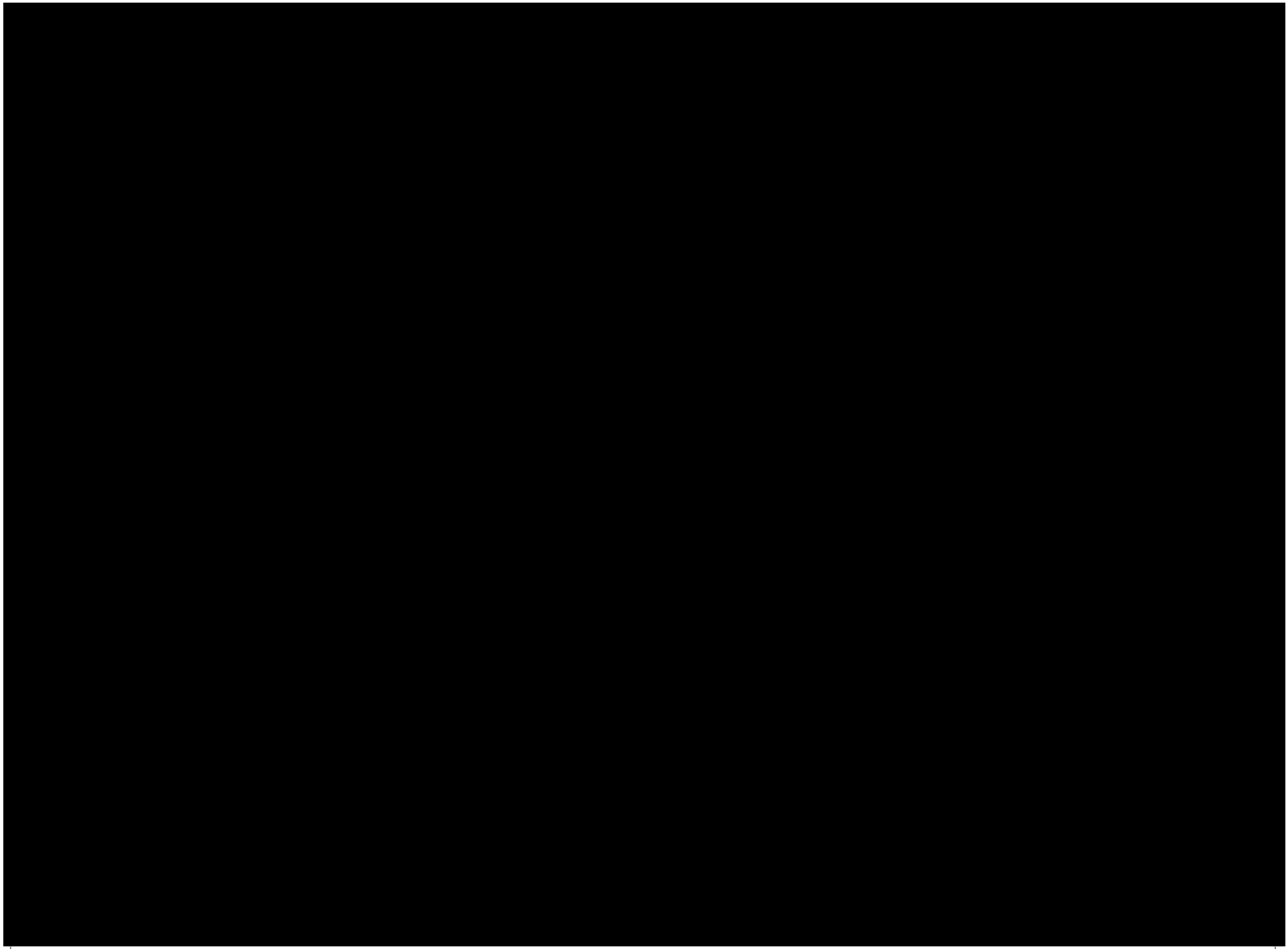




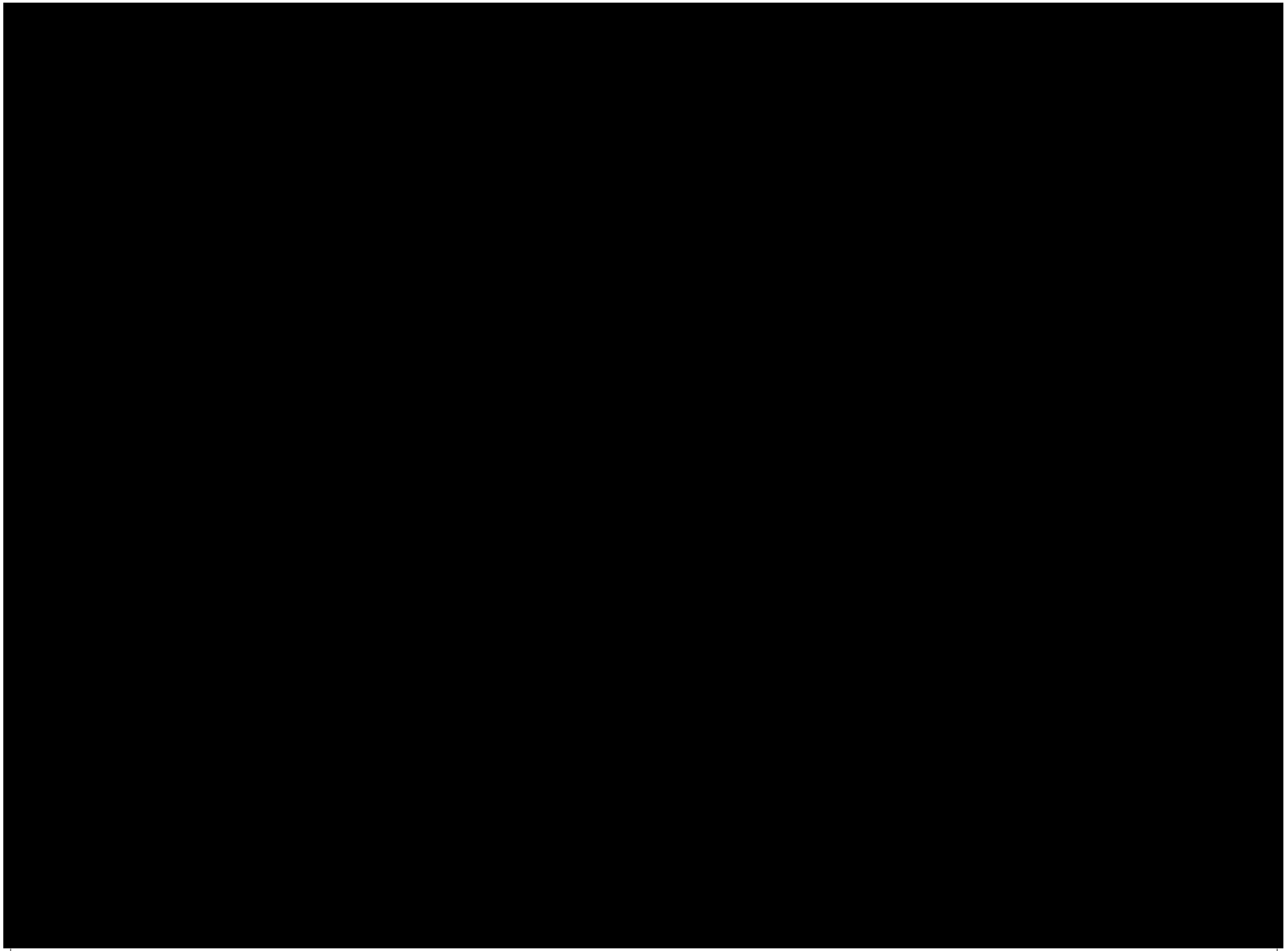




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## VI.A.2.I.c.2 Project Timeline [RFP V.H.2]

**REQUIREMENT: RFP Section V.H.2**

Provide a detailed project timeline that clearly demonstrates all the project implementation steps, from inception through completion, to provide assurances on your ability to meet the Go-live date. At a minimum, the timeline must include the date(s) when all components will be delivered for the User Acceptance Testing (UAT) environment, proposed dates for training, Go-live date, and warranty period. Such dates shall conform with the required timeframes outlined in Section (V)(H)(3). State expects the vendor to use Commercially Reasonable Efforts to complete the Design, Development, and Implementation (DDI) within twelve (12) months of the Kickoff. The DDI shall be complete no later than eighteen (18) consecutive months after the Kickoff.

***Conduent's project timeline leverages more than 27 years of successful Medicaid drug rebate administration deployment and CMS certifications nationwide, resulting in a mature CMdS Rebate Administration solution.***

**CMdS Does Not Require Development to Meet DHHS Requirements**

Our DDI phases closely match the required phases identified in the RFP and does not require development.

- We use a proven, milestone-driven implementation methodology.
- Implementation framework incorporates milestone reviews, readiness assessments, critical-path monitoring, and executive governance.

Conduent executes Nebraska's Medicaid Drug Rebate (MDR) System Design, Development, and Implementation (DDI) effort using a proven, milestone-driven implementation methodology. Our approach emphasizes early planning, continuous stakeholder engagement, proactive risk management, rigorous testing, and integrated CMS certification activities to drive successful project outcomes. With more than 27 years of Medicaid drug rebate administration experience, we implement a mature CMdS Rebate Administration solution, and proven implementation practices. Our solution has supported successful Medicaid system deployments and CMS certifications nationwide.

We understand that Nebraska expects the DDI effort to be completed within twelve (12) months of Project Kickoff. Conduent dedicates experienced project leadership, certified project management professionals, MDR Subject Matter Experts (SMEs), business analysts, technical architects, data migration specialists, and certification experts to support Nebraska's MDR System Design, Development, and Implementation (DDI) effort. This multidisciplinary team drives project execution, resolves challenges proactively, and maintains momentum throughout the implementation lifecycle. They maintain project momentum and keep the implementation on schedule through every phase of delivery. Our implementation framework incorporates milestone reviews, readiness assessments, critical-path monitoring, and executive governance throughout the project lifecycle to prevent delays and support successful delivery.

## Proposed High-Level DDI Timeline

Conduent expects to complete the DDI effort within twelve months, while maintaining schedule flexibility within the eighteen-month maximum period. The timeline below assumes a Project Kickoff date of January 2027 and demonstrates Conduent's ability to complete DDI within the State's targeted twelve-month implementation window. The schedule also maintains flexibility within the eighteen-month maximum implementation period. The proposed timeline conforms with the required timeframes outlined in Section (V)(H)(3).

Revised Timeline (7/21/2026). Figure VI.A.2.I.a.2-5 details the key milestones of our highly configurable CMdS solution.



**Figure VI.A.2.I.a.2-5. Phases of the Proposed High Level DDI Project Timeline**
*Conduent's highly configurable CMdS solution is implemented in twelve months.*

The Contract Start date is presumed to be **January 4,2027**. The following tables detail the Key Activities and Deliverables for each Milestone and tasks.

## *Milestone 1 – Requirements and Design*

Milestone 1, Requirements and Design, establishes the foundation for implementation by validating business, technical, operational, and interface requirements. Conduent collaborates with DHHS and project stakeholders to document requirements, confirm design decisions, identify dependencies, and establish the baseline for configuration, testing, and implementation activities. Please refer to the proposal section, VI.A.2.I.c.1 Work Plan, for the actual dates for these activities and deliverables.

### *Planning and Start Up*

Contract planning and start up is heavily dependent on project management activities. Many of the Plans that will govern the project and establish implementation of the system are developed, submitted, approved, and implemented. Conduent collaborates with DHHS and project stakeholders to finalize project plans, validate assumptions, identify dependencies, and prepare the project for subsequent design, development, and implementation activities. Table VI.A.2.I.a.2-6 identifies key activities and required deliverables for Planning and Start Up.

**Table VI.A.2.I.a.2-6. Contract Planning and Start Up Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Executive Leadership Kickoff (Virtual)<br>• Project Kickoff Meeting (On-site)<br>• Project governance establishment<br>• Project Management Environment Setup<br>• Staffing mobilization<br>• Integrated Master Schedule development<br>• Master Project Management Plan development<br>• Communication Management Plan development<br>• Staffing Management Plan development<br>• Risk Management Plan development<br>• Issue Management Plan development | • Leadership Kickoff Meeting Presentation<br>• Project Kickoff Meeting & Presentation<br>• Master Project Plan (WBS)<br>• Deliverable Review and Approval Process (DRAP)<br>• Integrated Master Schedule<br>• Project Management Plan (PMP)<br>• Risk Management Plan<br>• Issue Management Plan<br>• Communication Management Plan<br>• Staffing Management Plan<br>• Change Management Plan<br>• Application Configuration and Maintenance Plan<br>• Initial Security Review of Proposed Software Non-written, Performed<br>• Project Management Environment Implemented<br>• Project Management, Requirements Management, and Testing Management Tool Selection<br>• Environment Configuration, Minimally for Development Established<br>• Project Management, Requirements Management, and Testing Management Tool Selection and Implementation<br>• Application Configuration and Maintenance Plan |

### *Requirements Validation*

Requirements Validation confirms business, technical, operational, and interface requirements before design and configuration activities begin. Conduent collaborates with DHHS and project stakeholders to validate requirements, resolve questions, document decisions, and establish a shared understanding of project expectations.

**Table VI.A.2.I.a.2-7. Requirements Validation Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Business process discovery workshops<br>• Functional requirements validation<br>• Technical requirements validation<br>• Interface requirements validation<br>• Reporting requirements validation<br>• Data conversion analysis<br>• Requirements Document development<br>• Requirements Traceability Matrix (RTM) development | • Requirements Document<br>• Requirements Traceability Matrix (RTM) |

### *Design*

Design's main activity is an iterative development and system testing process. It is comprised of deliverables that are critical for interfaces, data management processes, environment configuration, and system tests.

**Table VI.A.2.I.a.2-8. Requirements Design Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Design and Configuration Sessions<br>• Interface Document development<br>• Data Management Design Document development | • Interface Design Document<br>• Data Management Design Document<br>• |

## *Milestone 2 - Development and Testing*

The Milestone, Development and Testing, is driven by the development and approval of Plans that guide pre-implementation. Together, they verify that solution components and interfaces function as designed before implementation.

**Table VI.A.2.I.a.2-9. Development and Testing Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Development and System Testing (iterative)<br>• Development and Testing<br>• Configuration<br>• Quality Management Plan development<br>• Business process discovery workshops | • Test Management Plan<br>• Quality Management Plan<br>• Training Plan<br>• Training Materials<br>• Training Results Report |

| Key Activities | Deliverables |
|---|---|
| • Configuration<br>• System Test<br>• End to End Test<br>• UAT<br>• Security and access design<br>• Reporting requirements validation<br>• Training execution<br>• Environment setup | • Integration Plan<br>• Implementation Plan<br>• Infrastructure Plan<br>• Pre-Operational Transition Plan<br>• Code Migration and Deployment Processes<br>• Development, Testing, and Pre-Implementation Deliverables and Work Products<br>• Contingency Plan<br>• Cut-over Plan<br>• Data Security Plan<br>• Test Execution and Results<br>• System Test Execution and Results<br>• End to End (E2E)Testing Execution and Result, and Report<br>• UAT Execution and Results, and Report<br>• State Staff Training<br>• User Manuals<br>• Delivery of production ready system & solution<br>• Business Continuity/Disaster Recovery Plan<br>• Initial Security Review of Proposed Software<br>• Environment Configuration, for all Remaining Environments Established |

### *Milestone 3 – Data/File Conversion and Migration*

The data/file conversion and migration includes the environment setup, various configurations, report development and data migration development and testing.

**Table VI.A.2.I.a.2-10. Data/File Conversion and Migration Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Data Migration development and testing<br>• Data conversion analysis | • Data/File Conversion and Migration Plan.<br>• Conversion Mapping Guide<br>• Data/File Conversion Test Plan<br>• Perform the Data/File Conversion and Migration<br>• Provide a Data/File Conversion and Migration Results Report<br>• Obtain acceptance from the State on Data/File Conversion and Migration Results |

### *Milestone 4 – Operational Readiness Milestone*

Operational Readiness includes more testing of the system, security, and performance. It is the milestone that decides if the solution is ready to go live. This milestone is where data begins to be collected for CMS certification.

**Table VI.A.2.I.a.2-11. Phase 4 Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Operational Readiness Review (ORR)<br>• Performance testing<br>• Security testing<br>• Defect remediation<br>• Warranty support<br>• Implementation Planning and Checklists<br>• Go-Live<br>• Complete transition to Account Management<br>• Gather data to support required metrics<br>• Transition to Account Management Complete | • ORR Plan<br>• Go Live Deliverables and Work Products<br>• Completion of all required ORR certification artifacts<br>• ORR Results Report<br>• Fully operational production MDR solution providing all agreed functionality<br>• Online survey for end users feedback<br>• Operations and Maintenance (O&M) Plan<br>• Begin collecting CMS metric data<br>• Fully functional customer support ready<br>• Turnover Plan<br>• Knowledge Transfer Plan<br>• Go-Live Deliverables and Work Products Approved<br>• "Go/No Go" Standards<br>• Implementation Checklists<br>• Implementation Results Acceptance |

## *Phase 5 – CMS Certification*

CMS certification supports compliance with federal Medicaid enterprise requirements and validates that the MDR solution meets applicable CMS standards and outcomes. CMS certification also enables DHHS to claim available federal funding associated with the certified solution and its operations.

**Table VI.A.2.I.a.2-12. Phase 5 Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Certification Kick-Off<br>• Initial Independent Security Assessment<br>• CMS Certification Management Plan development<br>• Final ORR Evidence Documentation and Support<br>• CMS Streamlined Modular Certification (SMC)<br>  – CMS ORR Preparation<br>  – CMS ORR Execution<br>  – CMS Certification Review (CR) Preparation<br>  – CMS CR Execution<br>• CMS Certification Support<br>  – Assist DHHS with Advanced Planning Document Supporting materials<br>  – Assist DHHS with ORR<br>  – Assist DHHS with CR | • CMS Certification Plan<br>• Certification Kick-Off Presentation<br>• Final ORR Intake Form<br>• Final ORR Evidence Documentation<br>• ORR Draft Presentation<br>• Operations Metrics Reporting<br>• Official Acceptance Letter and Request for Certification Letter<br>• CR Intake Form (required for enhanced funding)<br>• CR Evidence Documentation and Support<br>• Metrics Reporting<br>• CR Presentation<br>• CMS Certification Review<br>• Assist State with Advanced Planning Document (APD) Supporting Materials<br>• Assist State with Operational Readiness Review<br>• Assist State with Certification Review<br>• Independent Security Assessment |

In addition to the milestone key activities and deliverables, Conduent provides DHHS with a description training, Operational Readiness and Go-Live Preparation, production deployment and delivery, and MDR warranty and stabilization.

The timeline includes the date(s) when all components are delivered for the User Acceptance Testing (UAT) environment, proposed dates for training, Go-live date, and warranty period. Such dates shall conform with the required timeframes outlined in Section (V)(H)(3).

### *Training*

Conduent conducts role-based training between September and November 2027, aligning training activities with UAT and operational readiness efforts. Operation Manuals, system administration guides, and knowledge transfer documentation are key deliverables in addition to formal training.

**Table VI.A.2.I.a.2-13. Training Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Executive briefings<br>• Business-user training<br>• System administrator training<br>• Technical support training<br>• Reporting training<br>• Security administration training<br>• Knowledge-transfer sessions | • Training Materials<br>• User Guides<br>• Operations Manuals<br>• System Administration Guides<br>• Knowledge Transfer Documentation |

### *Operational Readiness and Go-Live Preparation*

Operational Readiness and Go-Live Preparation validate that personnel, processes, interfaces, data, and support procedures are prepared for production operations. Conduent conducts an operational readiness assessment, more testing, and final data migration preparation.

**Table VI.A.2.I.a.2-14. Operational Readiness and Go-Live Preparation Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Operational Readiness Assessment<br>• Go/No-Go reviews<br>• Disaster recovery testing<br>• Production environment validation<br>• Cutover planning<br>• Final data migration preparation<br>• Stakeholder communications<br>• Begin gathering data to support required metrics | • Go Live Deliverables and Work Products<br>• Completion of all required Operational Readiness Review (ORR) certification artifacts<br>• Fully operational production MDR solution providing all agreed functionality<br>• Online survey for end users feedback<br>• Fully functional customer support<br>• Transition to Account Management<br>• Turnover Plan<br>• Knowledge Transfer Plan |

### *Go-Live and Production Deployment*

Conduent proposes Go-Live during Month 12 following Project Kickoff, consistent with the State's preferred DDI schedule and well within the required eighteen-month implementation window.

**Table VI.A.2.I.a.2-15. Go-Live and Production Deployment Key Activities and Deliverables**

| Key Activities | Deliverables |
|---|---|
| • Final data conversion<br>• Production deployment<br>• Interface activation<br>• Production validation<br>• Hypercare support<br>• Daily readiness reviews | N/A |

### *Phase 10 – Warranty and Stabilization Period*

Following Go-Live, Conduent provides a comprehensive warranty and stabilization period during which dedicated project resources remain engaged to support production operations, resolve defects, monitor performance, and assist DHHS users.

**Table VI.A.2.I.a.2-16. Phase 9 Key Activities and Deliverables**

| Warrant Activities | Deliverables |
|---|---|
| • Defect resolution<br>• Performance monitoring<br>• System optimization<br>• Knowledge transfer reinforcement<br>• Operational support<br>• Readiness reviews | • Warranty Reports<br>• Defect Tracking Reports<br>• Stabilization Assessments<br>• Transition-to-Operations Documentation |

### *Assurance of Timely Delivery*

Conduent brings extensive experience implementing Medicaid pharmacy and drug rebate solutions for state agencies. We currently support rebate programs that collect approximately $5 billion annually. Our team consistently meets CMS-required rebate deadlines.

Our mature CMdS Rebate Administration solution drives efficient program operations. Dedicated Medicaid Drug Rebate SMEs provide deep industry expertise. A proven project governance framework keeps implementation on track. An integrated CMS certification methodology supports compliance from the start. Proactive risk management practices help identify and address issues early. Together, these strengths accelerate implementation while maintaining quality and compliance.

Conduent combines a proven technology platform with experienced project resources. We engage stakeholders through continuous collaboration throughout the project lifecycle. Milestone-driven project controls keep activities aligned with project objectives and timelines.

This approach positions Conduent to complete the DDI effort within the State's twelve-month target schedule. It supports operational readiness and advances CMS certification objectives. It also enables a successful Go-Live well within the required eighteen-month timeframe.

### VI.A.2.I.c.3 Project Management [RFP V.H.3]

**REQUIREMENT: RFP Section V.H.3**

Please explain your company's approach to each of the following as it relates to:

- Project management.
- Risk management.
- Communication management.
- Staffing plan.
- Background checks on any personnel accessing sensitive and confidential information.
- Any tool(s) used for project management, document management, status reporting, and project collaboration.

Describe your company's methodology to accomplishing each respective task listed in a. through e.

a. Designate a Project Manager to coordinate and schedule implementation, configuration, and associated deliverables. The Project Manager shall be acceptable to the State.

b. Employ a project management approach that will satisfy the scope of work and incorporate all activities described in the RFP.

c. Designated project management to participate in weekly project update teleconference meetings with State resources. If deemed necessary by the Vendors' project manager or State resources, the Vendor will include other Vendor project resources to join the weekly call(s).

d. Submit a monthly status report to the State team based on agreed upon metrics.

e. Facilitate executive level review meetings to update executive stakeholders on project status and to formalize any agreed upon changes to the project plan.

***Conduent provides DHHS clear ownership, visible progress, and timely decisions throughout implementation.***

Successful delivery of Nebraska's MDR solution depends on disciplined planning, active oversight, early risk identification, and consistent communication across business, technical, operational, and State teams. Conduent applies a project management approach aligned with the Project Management Institute's (PMI) best practices and tailored to the scope, governance requirements, and delivery activities defined in the RFP.

Our approach brings project planning, schedule management, deliverable oversight, risk and issue management, change control, communication, staffing, and executive governance into one coordinated framework. DHHS receives a clear view of project performance, upcoming activities, dependencies, decisions, and concerns throughout implementation.

## Designated Project Manager

Conduent designates [redacted] as the Project Manager and primary point of contact for DHHS, subject to State acceptance. She coordinates implementation, configuration, testing, training, readiness, and associated deliverables across the project.

As the central point of accountability, Deisha:

- Maintains the Project Work Plan and Integrated Master Schedule
- Coordinates activities, resources, milestones, and dependencies
- Oversees deliverable development, review, and submission
- Tracks decisions, action items, risks, issues, and changes

- Coordinates Conduent, subcontractor, and DHHS resources
- Provides project status and performance information
- Escalates matters requiring leadership attention or State decisions

[redacted] works closely with the Account Manager, Executive Sponsor, technical leads, business analysts, subject matter experts, and operational staff. This gives DHHS direct access to the resources needed to resolve questions, evaluate impacts, and keep work moving.

## Project Management Approach

Conduent's Project Management Methodology aligns with the PMBOK® Guide, Seventh Edition and incorporates mature delivery practices from the Capability Maturity Model Integration framework. We tailor proven governance processes, reporting methods, templates, and controls to Nebraska's MDR requirements and DHHS project practices.

The methodology guides project initiation, planning, execution, monitoring and control, and closeout. It brings schedule and deliverable management, resource coordination, risk and issue management, change control, quality management, communication, and executive oversight into one coordinated approach. This gives DHHS clear accountability and a current view of project performance, dependencies, decisions, and concerns throughout implementation.

Our project management methodology works alongside Conduent's implementation lifecycle. Governance and delivery activities remain aligned across requirements validation, design, configuration, development, testing, data conversion, interfaces, training, security, deployment, and transition to operations. This allows multiple workstreams to progress while maintaining visibility into shared milestones, dependencies, risks, decisions, and resource needs.

Figure VI.A.2.I.a.2-6 summarizes the key elements of Conduent's project management approach and how they work together to support successful delivery.



**Figure VI.A.2.I.a.2-6.**

## *Project Work Plan*

The Project Work Plan translates the approved scope into the activities needed to implement the CMdS Rebate solution. Developed in coordination with DHHS, it defines project tasks, milestones, dependencies, resource assignments, deliverables, review periods, implementation sequencing, and decision points.

Conduent maintains the Project Work Plan throughout the engagement and aligns it with applicable DHHS schedules. It provides a current view of progress across business, technical, operational, and State activities and supports:

- Coordinating configuration, development, data conversion, interfaces, testing, training, security, and operational-readiness activities
- Tracking milestones, dependencies, and the critical path
- Monitoring deliverables, resource needs, and implementation progress
- Identifying schedule variances and corrective actions
- Managing risks, issues, actions, assumptions, decisions, and change requests
- Coordinating activities with DHHS, subcontractors, interface partners, and other stakeholders
- Preparing for deployment and transition to ongoing operations

The Project Manager regularly reviews performance against the Project Work Plan. When work differs from the approved schedule, the team evaluates the cause, assesses the impact on dependent activities, and recommends corrective action. Changes affecting approved scope, schedule, cost, or project baselines follow the established change-control process before the plan is updated.

The Project Work Plan incorporates deliverable management. Conduent tracks each deliverable from development and internal quality review through DHHS review, comment resolution, and final disposition. Owners, due dates, review status, revisions, and approvals remain visible to address delayed decisions or unresolved comments before they affect subsequent work.

## *Governance and Project Coordination*

Conduent establishes a governance model that supports clear accountability, timely decisions, and open communication throughout implementation. The Project Manager coordinates activities among DHHS, Conduent workstreams, subcontractors, interface partners, and other stakeholders.

Weekly project updates, workstream reviews, deliverable reviews, and executive-level meetings promote informed decision-making and provide timely insight into project progress, milestones, dependencies, risks, issues, decisions, and changes. Each forum operates with a defined purpose, audience, cadence, and escalation path. The project team records decisions, assigns action items, and tracks progress through completion.

Governance priorities change as the project advances. Early oversight focuses on planning, requirements, design, and configuration. Later activities focus on testing, data conversion, training, production readiness, deployment, and transition to operations. Throughout each phase, project activities remain tied to the Project Work Plan and agreed governance and reporting processes.

## Risk Management

Conduent manages risks throughout the contract so the project team can address potential problems before they affect scope, schedule, cost, quality, compliance, or MDR operations. Risk identification begins early in the project and continues through planning sessions, workstream reviews, status reporting, testing, readiness assessments, and day-to-day project activities.

The team records risks in a centralized RAID repository and evaluates each item based on its likelihood, potential impact, and level of control. Each risk receives an accountable owner and a planned response.

Our risk management process includes:

- Identifying and documenting the risk, cause, and potential effect
- Assessing probability, impact, level of control, and priority
- Assigning an owner and target action dates
- Developing mitigation and contingency actions
- Monitoring status, triggers, and changes in exposure
- Escalating risks that exceed agreed thresholds
- Confirming outcomes and documenting closure

Risk owners report progress during project reviews and update mitigation activities as conditions change. High-priority risks are elevated through the governance process when they require executive direction, cross-project coordination, additional resources, or a DHHS decision.

Conduent also manages active issues through the RAID repository by prioritizing, assigning, tracking, and reporting issues through to resolution. The repository gives DHHS visibility into ownership, business impact, corrective actions, dependencies, target dates, escalation status, and final disposition.

Figure VI.A.2.I.a.2-7 shows how our proactive approach promotes transparency, accountability, and continuous communication while reducing the likelihood that risks will disrupt program objectives, schedules, or mission outcomes.

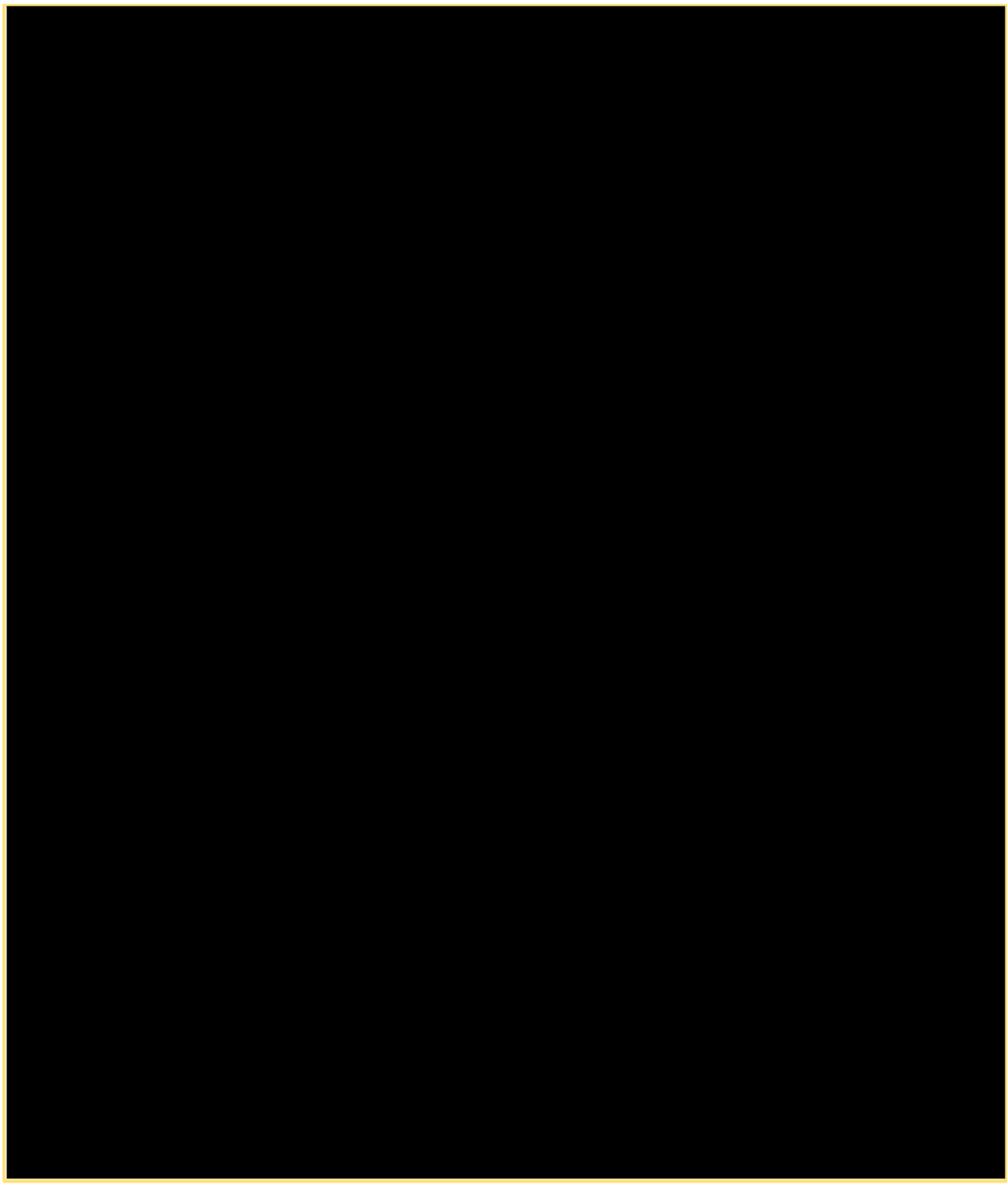


**Figure VI.A.2.I.a.2-7.**

## Communication Management

Conduent establishes a Communication Plan that defines how project information moves among DHHS, Conduent, subcontractors, interface partners, and other stakeholders. Working with DHHS, we identify which groups need the project information and the level of detail each group requires.

The Communication Plan defines the purpose, audience, owner, method, frequency, and escalation path for each communication. It addresses routine status reporting, workstream coordination, deliverable reviews, decisions, risks, issues, changes, and executive oversight.

Our Project Manager serves as the primary point of contact for project communications. She coordinates meetings, status reports, decisions, action items, and follow-up activities. Other Conduent leaders and subject matter experts participate when a topic requires technical, operational, security, testing, or program expertise.

### *Weekly Project Updates*

The Project Manager facilitates and participates in weekly project update meetings with DHHS leadership. These meetings provide a consistent forum to review:

- Schedule and milestone status
- Current and upcoming activities
- Deliverable progress and approvals
- Risks, issues, dependencies, and corrective actions
- Change requests and decisions
- Staffing or resource concerns
- Action items requiring follow-up

When the Project Manager or DHHS determines the need for additional expertise, the appropriate Conduent project resources join the call. This allows the team to address detailed questions and avoid delaying decisions until a later meeting. Conduent documents key decisions, action items, owners, and due dates and distributes them following each meeting. Open actions remain visible until completed or otherwise resolved.

### *Monthly Status Reporting*

Conduent submits a monthly status report based on metrics agreed upon with DHHS. The report provides an accurate view of overall project health and highlights areas that require attention or decisions.

Monthly reporting addresses:

- Executive-level project status
- Schedule and milestone performance
- Deliverable status
- Accomplishments during the reporting period

- Planned activities for the next period
- Open risks, issues, and mitigation actions
- Change-request status
- Staffing and resource updates
- Decisions or assistance needed from DHHS

DHHS and the project team develop the final report format and metrics so the report reflects the information State leadership and project teams need to evaluate progress.

### *Executive-Level Reviews*

Conduent facilitates executive-level review meetings on a schedule agreed upon with DHHS. These sessions give leadership a focused view of implementation progress, major accomplishments, significant risks and issues, resource needs, and decisions that may affect delivery.

Rather than repeating detailed project status, executive reviews focus on matters that require leadership awareness or action. This may include major schedule variances, unresolved dependencies, high-priority risks, significant change requests, resource concerns, and readiness for upcoming milestones.

The meetings also provide a forum to confirm and formalize agreed changes to the Project Plan. Conduent documents approved decisions and communicates them to the affected teams so project activities remain aligned.

## Staffing Plan

Conduent's Staffing Plan identifies the leadership, business, technical, testing, security, data, training, and operational resources needed to complete the MDR scope of work. The plan defines each role's responsibilities, expected participation, reporting relationship, and alignment to project activities.

Resource planning begins with the Project Work Plan. Conduent maps required skills and staffing levels to planned activities, milestones, and deliverables. Project leadership monitors workload, availability, and upcoming needs throughout implementation so the appropriate resources are available for design, configuration, testing, training, data conversion, and production readiness.

The staffing approach includes:

- Defined roles, responsibilities, and decision authority
- Resource assignments aligned with the project schedule
- Workload and capacity monitoring
- Access to subject matter experts when specialized support is needed
- Cross-trained or backup resources for key responsibilities
- Succession and replacement planning
- Knowledge transfer when staffing changes occur

When a staffing change is necessary, Conduent assigns a qualified replacement and coordinates the transition of open work, decisions, documentation, and responsibilities. The detailed Staffing and Resource response in Proposal Section VI.A.2.II.a.I.4 provides additional information about proposed personnel and staffing commitments.

### *Background Checks and Protection of Sensitive Information*

Conduent requires that all personnel who access confidential information, PHI, PII, Medicaid program data, or restricted systems complete a background screening before granting access. Screening and onboarding controls include criminal background checks, identity and employment verification, confidentiality acknowledgments, and required security, privacy, and HIPAA training.

Conduent maintains records of completed screenings and applies the same requirements to personnel assigned throughout the contract. Access is based on job responsibilities and the minimum information needed to perform assigned work.

Personnel receive individual credentials. The team reviews, makes updates when roles or project assignments change, and promptly removes all access when it is no longer required. These controls protect sensitive information while allowing authorized project personnel to complete their responsibilities.

## Project Management, Document Management, Reporting, and Collaboration Tools

Conduent uses established tools to support project planning, document control, reporting, requirements management, and team collaboration. Agreed project processes and access controls govern tool use.

**Table VI.A.2.I.a.2-17. Project Management, Document Management, Reporting, and Collaboration Tools**

| Function | Primary Tool | Project Use |
|---|---|---|
| Project and schedule management | [redacted] | Project Work Plan, Integrated Master Schedule, milestones, dependencies, resource assignments, critical path, and schedule variance |
| Document and deliverable management | [redacted] | Version control, review workflows, controlled access, deliverable tracking, audit history, and approved project records |
| Status and performance reporting | [redacted] | Monthly status reports, metrics, milestone reporting, deliverable status, staffing updates, and risk and issue reporting |
| Project communication and collaboration | [redacted] | Weekly project updates, virtual work sessions, team communication, file collaboration, and stakeholder coordination |
| Requirements, changes, and configuration tracking | [redacted] | Requirements traceability, work-item tracking, change management, testing coordination, and configuration records |

These tools give DHHS access to current project information and support consistent tracking across schedules, deliverables, requirements, actions, decisions, risks, issues, and changes. The project team confirms tool access, roles, permissions, and reporting expectations during project initiation.

Conduent provides DHHS with the visibility into implementation progress, milestones, dependencies, risks, and issues. We do this through experienced project leadership, proactive risk management, clear communication, disciplined staffing, workforce security controls, and practical project tools. This visibility gives DHHS the oversight and information needed to guide the MDR implementation from initiation through operational transition

## VI.A.2.I.d Deliverables and Due Dates [RFP V.I]

**REQUIREMENT: RFP Section V.I**

Percentages for Implementation Milestones would include below billing milestones, with specified deliverables tied to each milestone:

Requirement and Design Milestone: 20% of Implementation fees.

Development and Testing Milestone: 20% of Implementation fees.

Data/File Conversion and Migration Milestone: 20% of Implementation fees.

Operational Readiness Milestone: 20% of Implementation fees.

Certification Milestone: 20% of Implementation fees.

Conduent has reviewed and understands that each of the five Implementation Milestones represents 20% of the Implementation fees, with specified deliverables tied to each billing milestone. Table VI.A.2.I.a.2-18 summarizes the implementation (billing) milestones and their target completion dates.

**Table VI.A.2.I.a.2-18. Implementation (Billing) Milestone Timeline**

| Implementation (Billing) Milestone | Target Completion Date |
|---|---|
| Milestone 1: Requirements and Design | 4/16/2027 |
| Milestone 2: Development and Testing | 12/24/2027 |
| Milestone 3: Data/File Conversion and Migration | 12/31/2027 |
| Milestone 4: Operational Readiness | 2/1/2028 |
| Milestone 5: Certification | 9/29/2028 |

We describe these deliverables further in Proposal Section VI.A.2.I.d.1 – Implementation Deliverables. Upon contract award, we will collaborate with the State to review and finalize the milestone deliverables and due dates associated with the established milestone percentages.

### VI.A.2.I.d.1 Implementation Deliverables [RFP V.I.1]

**REQUIREMENT: RFP Section V.I.1**

For the MDR scope of work the implementation deliverables will be tracked within 5 milestones. As deliverables are completed, they will be provided to DHHS for review and approval. Approval authority will be defined by DHHS. All deliverables must be approved in writing. Once all deliverables are completed for that milestone, that milestone payment, based on the percentage of the total implementation cost noted on the Cost Proposal, can be billed. The first milestone should be within the first few months after Contract Award, as several of the deliverables have specific requirements noted in the Functional and Technical Specification attachments. Milestone 2 & 3 must be completed prior to Go Live, with all required deliverables completed, reviewed and approved by DHHS. Milestone 4 will occur after Go Live, when all Go Live activities are completed, and other Milestone 4 deliverables have been approved by DHHS. Milestone 5 will occur not less than 6 months after Go Live when all CMS certification activities are

completed, and CMS has approved the solution and project.

The Vendor shall complete each of the following items as indicated and in accordance with the requirements as outlined herein the RFP Section (V) and Attachments A - E, and any related documents. Each project section is to be reviewed and approved by the State stakeholder. The vendor must create a document to be utilized for the formal approval of each project section, which is to be electronically signed by the designated State stakeholder.

Below are the specific deliverables for each milestone for the MDR scope of work:

a. Milestone 1: Requirement and Design Milestone, includes creation, review and approval of the following:

i. Project Kickoff Meeting & Presentation

ii. Master Project Plan

iii. Integrated Master Schedule

iv. Project Management Plan

v. Risk Management Plan

vi. Issue Management Plan

vii. Review and Approval Process (DRAP)

viii. Communication Management Plan

ix. Staffing Management Plan

x. Change Management Plan

xi. Application Configuration and Maintenance Plan

xii. Project Requirements and Design Deliverables

xiii. Initial Security Review of Proposed Software

xiv. Project Management, Requirements Management, and Testing Management Tool Selection and Implementation

xv. Environment Configuration, minimally for Development

b. Milestone 2: Development and Testing Milestone, includes but not limited to creation, review and approval of the following:

i. Test Management Plan.

ii. Quality Management Plan.

iii. Training Plan.

iv. Integration Plan.

v. Implementation Plan.

vi. Pre-Operational Transition Plan.

vii. Environment Configuration, for all remaining environments;

viii. Code Migration and Deployment Processes.

ix. Development, Testing, and Pre-Implementation Deliverables and Work Products.

x. Contingency Plan.

xi. Cut-over Plan.

xii. Data Security Plan.

xiii. Test Execution and Results.

xiv. State Staff Training.

xv. User Manuals.

xvi. Delivery of production ready system & solution.

xvii. Business Continuity/Disaster Recovery Plan.

xviii. Infrastructure Plan.

c. Milestone 3: Data/File Conversion and Migration

i. Data/File Conversion and Migration Plan.

ii. Data/File Conversion Test Plan.

iii. Conversion Mapping Guide.

iv. Perform the Data/File Conversion and Migration.

v. Provide a Data/File Conversion and Migration Results Report; and

vi. Obtain acceptance from the State on Data/File Conversion and Migration Results.

d. Milestone 4: Operational Readiness Milestone, includes the following:

i. Go Live Deliverables and Work Products.

ii. Completion of all required Operational Readiness Review (ORR) certification artifacts.

iii. Fully operational production MDR solution providing all agreed functionality.

iv. Online survey for end users feedback.

v. Begin gathering data to support required metrics.

vi. Fully functional customer support.

vii. Transition to Account Management.

viii. Turnover Plan.

ix. Knowledge Transfer Plan.

e. Milestone 5: Certification Milestone, includes the following:
i. CMS Certification Requirements
1) General.
2) Pre-Operational Readiness Review.
3) Operational Readiness Review.
4) Certification Review.
5) Operations Metrics Reporting.
ii. CMS Certification Support
1) CMS Certification Plan.
2) Assist the State with Advanced Planning Document (APD) Supporting materials.
3) Assist the State with Operational Readiness Review (ORR).
4) Assist the State with Certification Review (CR).
5) Metrics Reporting.

***Conduent manages implementation deliverables across the five milestones identified in the RFP, giving DHHS clear visibility into progress, review status, approvals, and milestone completion.***

Conduent develops and submits the required implementation deliverables across the five RFP-specified milestones:

- **Milestone 1.** Requirement and Design
- **Milestone 2.** Development and Testing
- **Milestone 3.** Data/File Conversion and Migration
- **Milestone 4.** Operational Readiness
- **Milestone 5.** Certification

**Benefits of Conduent' Proven Deliverable Management Approach**

- Library featuring 150+ system development and project management templates based on industry standards and best practices
- Project management methodology that supports effective deliverables management
- Tools that provide a document repository and tracking of deliverable issues, action items, and risks, as well as requirement traceability

Together, these milestones provide a clear path to implement the new MDR solution from initial planning through CMS certification. The sections below describe how Conduent prepares, reviews, and obtains approval for each deliverable, followed by the deliverables associated with each milestone.

## Deliverable Review and Approval

Conduent uses a defined process to develop, review, approve, and baseline each RFP-defined project section and implementation deliverable required by RFP Section V and Attachments A–E. DHHS identifies the State stakeholder authorized to approve each deliverable.

The team conducts workshops and review sessions to develop deliverable content and document requirements, business rules, design decisions, dependencies, interfaces, workflows, and data mappings, as applicable. Conduent submits draft deliverables through the approved Deliverable Review and Approval Process (DRAP).

Stakeholder comments and requested revisions are recorded in a centralized review log. Conduent evaluates the feedback, updates the deliverable, and conducts walkthroughs when needed. After comments are resolved, we submit the final version for formal approval.

Conduent creates a Deliverable Approval Form that identifies:

- Deliverable name, version, description, and applicable requirements
- Review activities, revision history, and unresolved assumptions or dependencies
- Approval status and date
- Electronic signature blocks for the designated State approver and Conduent project leadership

The approval package includes the final deliverable, approval form, comment resolution log, and applicable supporting documentation. Conduent routes the package through the State-approved document management and electronic signature platform.

After approval, Conduent records the approval date, updates the project schedule and deliverable register, and baselines the approved version in the project repository. Subsequent changes follow the project change-control and approval processes.

This approach provides written State approval, electronic signatures, version control, requirements traceability, and a complete audit history for each required deliverable.

## Deliverables – Milestone 1: Requirement and Design

In support of Milestone 1, Conduent prepares the following deliverables. The project management team expects to complete these deliverables within the first few months after contract award. Upon Contract award we meet with DHHS to review and refine the scope, format, and schedule for Milestone 1 deliverables.

**i. Project Kickoff Meeting & Presentation.** Formally launches the MDR project and establishes a common understanding among all project participants. This deliverable introduces the implementation team, confirms project objectives, outlines the delivery approach, and defines how Conduent and DHHS work together throughout the project lifecycle. The presentation communicates the project vision, governance framework, stakeholder responsibilities, communication channels, reporting methods, decision-making structure, and key implementation milestones. It also establishes expectations for collaboration, reviews immediate project activities, and identifies critical dependencies that may affect project execution.

**ii. Master Project Plan.** Conduent develops the Master Project Plan as the detailed roadmap for completing the MDR implementation. The plan organizes the project into a Work Breakdown Structure of activities, tasks, subtasks, deliverables, milestones, review periods, and approval points. It identifies responsible roles, estimated effort, planned start and finish dates, dependencies, predecessors, successors, and critical-path activities. The Project Manager maintains the plan throughout implementation to track progress, manage schedule performance, and report variances against the approved baseline.

**iii. Integrated Master Schedule (IMS).** Conduent incorporates the MDR Project Work Plan into an Integrated Master Schedule that aligns MDR activities with the broader Nebraska Medicaid environment. The IMS includes relevant activities and dependencies involving DHHS, other State vendors, interface partners, shared environments, testing events, and deployment

activities. It identifies cross-project relationships, shared milestones, external dependencies, decision dates, and activities that could affect the MDR critical path. Conduent works with DHHS and affected parties to maintain the IMS as schedules and dependencies change, providing a coordinated view of how the MDR implementation fits within the State's larger program.

**iv. Project Management Plan.** Describes the methods, procedures, tools, and governance practices used to manage the MDR implementation. The document defines how work is planned, executed, monitored, and controlled. It establishes the processes for managing scope, schedule performance, communications, staffing, quality activities, issues, risks, changes, deliverables, and project reporting. The PMP also documents the governance structure, approval workflows, escalation protocols, and performance monitoring processes that support successful project execution. This deliverable serves as the operational guide for project management activities and provides stakeholders with a clear understanding of how we direct and oversee project delivery.

**v. Risk Management Plan.** Presents our approach for identifying, analyzing, responding to, and monitoring risks throughout the project lifecycle. The document explains how project teams identify and assess risks. Areas reviewed include scope, schedule, budget, quality, operations, security, testing, integration, and organizational readiness. It establishes risk assessment criteria, ownership responsibilities, escalation thresholds, mitigation planning activities, monitoring procedures, and reporting requirements. The plan supports proactive decision-making by providing a repeatable framework for managing uncertainty and addressing potential issues before they affect project outcomes. The project team maintains the plan as a living management tool and updates it as project conditions, priorities, and risk exposures evolve.

**vi. Issue Management Plan.** Establishes a consistent approach for identifying, documenting, evaluating, tracking, escalating, resolving, and communicating project issues. The plan defines how the project team records issues, assigns ownership, establishes target resolution dates, evaluates impacts, and monitors progress through closure. The plan promotes timely decision-making by defining escalation paths, approval authorities, issue prioritization criteria, and reporting requirements. The document also describes how our team integrates issue management activities with project governance meetings, status reporting, risk management activities, and change control processes. By providing a structured framework for issue resolution, the plan supports project transparency and helps project stakeholders understand the status and impact of open issues throughout the implementation lifecycle.

**vii. Deliverable Review and Approval Process (DRAP).** Governs the creation, review, revision, approval, and acceptance of project deliverables. The DRAP establishes a repeatable process that promotes collaboration between Conduent and DHHS and defines how deliverables progress from draft development to final approval. The process defines document submission procedures and review timeframes. It also outlines stakeholder responsibilities, comment management, version controls, and approval workflows. The process also defines entry and exit criteria for each review cycle and provides a clear path for resolving comments, obtaining stakeholder concurrence, and establishing approved deliverable baselines for project use.

**viii. Communication Management Plan.** Defines how project information is shared among project teams, executive leadership, DHHS stakeholders, business representatives, and technical participants. The plan presents the communication framework that supports consistent, accurate, and timely information exchange throughout the Contract term. It identifies stakeholder groups, communication objectives, reporting methods, meeting structures, communication frequencies, distribution channels, and escalation procedures.

The plan also establishes standards for meeting management, status reporting, stakeholder engagement, and executive communications. The plan serves as the project's communication roadmap and provides a structured approach for maintaining stakeholder awareness and promoting effective collaboration throughout implementation.

**ix. Staffing Management Plan.** Depicts the organizational structure, staffing strategy, resource assignments, and personnel management approach for the MDR project. The plan describes project team composition, reporting relationships, key responsibilities, required skill sets, and staffing allocations necessary to support successful project delivery.

The Staffing Management Plan identifies resources assigned to the project. The plan also addresses onboarding, knowledge transfer, resource transition, succession planning, and staffing contingency strategies to support project continuity.

The Staffing Management Plan provides DHHS with visibility into project resources and establishes a framework for managing staffing needs throughout implementation and ongoing operations.

**x. Change Management Plan.** Outlines the processes used to evaluate, approve, implement, and monitor changes that affect project scope, schedule, requirements, deliverables, configurations, interfaces, data, or operational processes. The plan defines the governance structure and procedures used to manage change requests from initial submission through final disposition. The document outlines how project stakeholders submit change requests, assess impacts, conduct technical and business analyses, obtain approvals, and communicate approved changes to affected parties. It also establishes decision-making authority, change categorization criteria, review procedures, implementation activities, and documentation requirements. The Change Management Plan supports controlled project execution by providing a clear framework for evaluating proposed changes, understanding associated impacts, and maintaining alignment with project objectives and approved baselines.

**xi. Application Configuration and Maintenance Plan.** Explains how the MDR solution is configured, administered, supported, updated, and maintained throughout implementation and operations. The plan defines the configuration strategy for application features, business rules, security roles, system parameters, interfaces, workflows, deliverables, and reporting components. It describes how configuration changes are evaluated, documented, tested, approved, deployed, and monitored across project environments. The document also explains the processes used to manage software releases, corrective actions, enhancements, version control, and ongoing operational support. Our team uses the plan to maintain application stability, promote consistency across environments, and provide DHHS with visibility into configuration and maintenance activities throughout the contract.

**xii. Project Requirements and Design Deliverables.** The requirements document clarifies the applicable RFP requirements and records the agreed interpretation so Conduent and DHHS share a mutual understanding of the required functionality. It captures business, functional, technical, operational, security, interface, data, and reporting requirements, along with related business rules, workflows, data flows, and operational expectations.

For requirements that require configuration or development, the design component translates the approved requirements into solution specifications for the Nebraska environment. Design documentation may include process models, workflow diagrams, interface specifications, data mappings, security models, reporting designs, conversion approaches, and architecture details. For requirements fully met by existing CMdS Rebate functionality and accepted by DHHS as matched, Conduent documents traceability to the standard solution rather than creating a separate design deliverable.

**xiii. Initial Security Review of Proposed Software.** Evaluates the solution against applicable security, privacy, compliance, and operational requirements before implementation activities progress. The review examines the security architecture, access controls, authentication methods, authorization framework, encryption capabilities, audit logging, monitoring functions, vulnerability management practices, data protection controls, and hosting environment characteristics. This deliverable documents the security posture of the proposed solution, identifies potential gaps, records remediation recommendations, and outlines actions required before production deployment.

**xiv. Project Management, Requirements Management, and Testing Management Tool Selection and Implementation.** Manages the selection, configuration, deployment, and use of the tools that support project governance and solution delivery. This deliverable lays out the evaluation process used to identify appropriate tools for project management, requirements management, testing management, defect tracking, issue management, reporting, and collaboration activities. The document outlines the selected platforms, their intended use, user roles, security controls, integration points, reporting capabilities, and administrative procedures. It also defines how project teams use the tools to manage schedules, track requirements, document decisions, record test results, monitor defects, maintain traceability, and support project reporting. We implement the approved toolset, configure it to support project activities, and provide project participants with guidance for effective use throughout implementation.

**xv. Environment Configuration, Minimally for Development.** Details the establishment, configuration, and administration of the development environment. The deliverable defines the infrastructure, software components, security controls, connectivity requirements, access procedures, and configuration settings required to support solution design, configuration, development, and unit testing.

The document identifies environment architecture and system components. It also documents database configurations, interface connectivity, user access roles, deployment procedures, monitoring processes, backup procedures, and migration paths. It provides a repeatable framework for environment setup, administration, and maintenance while supporting traceability among infrastructure components, application configurations, and implementation activities.

## Deliverables – Milestone 2: Development and Testing

Milestone 2 covers the following deliverables, which Conduent submits to DHHS for review and approval prior to Go-Live. Upon contract award, we work with DHHS to confirm and refine, as applicable, the scope and schedule for each deliverable.

**i. Test Management Plan.** Presents the strategy, processes, tools, environments, schedules, and responsibilities that govern solution validation throughout the contract. The plan describes how the project team validates solution performance. It confirms that the MDR solution supports approved business, functional, technical, security, interface, conversion, and reporting requirements. It establishes the approach for planning, executing, tracking, and reporting testing activities and provides a framework for coordinating testing efforts among Conduent, DHHS, and external stakeholders.

The document also details defect management procedures, test completion criteria, traceability methods, test reporting requirements, and responsibilities for each testing phase. The Test Management Plan serves as the authoritative guide for managing all testing activities from initial validation through production readiness.

**ii. Quality Management Plan.** Explains the processes and controls used to evaluate work products, monitor project performance, and promote consistent delivery of high-quality results. The plan outlines quality objectives, review procedures, acceptance criteria, quality metrics, audit activities, and continuous improvement practices that apply throughout implementation. It describes how the project team assesses deliverables, project activities, configurations, documentation, testing results, and operational readiness against established standards and expectations. The plan also identifies the roles responsible for quality oversight and describes the processes used to identify deficiencies, implement corrective actions, and measure results. This deliverable provides a structured framework for maintaining quality across all project work streams.

**iii. Training Plan.** Provides the strategy, schedule, curriculum, delivery methods, materials, and stakeholder-specific learning activities required to support successful adoption of the MDR solution. The plan identifies training audiences, learning objectives, instructional approaches, course content, training environments, training materials, and delivery timelines. It describes how we prepare users, administrators, managers, and support personnel to effectively perform their responsibilities in the new solution environment. The Training Plan also outlines methods for training delivery, knowledge transfer, training evaluation, and ongoing education activities following implementation. The project team uses this deliverable to coordinate all project-related training activities and provide a structured pathway for developing user proficiency and readiness for operations.

**iv. Integration Plan.** Identifies the activities required to establish, validate, deploy, and support data exchanges between the MDR solution and external systems. The plan describes the approach for managing interface design, development, testing, deployment, monitoring, and ongoing support activities. It identifies participating systems, data exchange requirements, interface dependencies, technical protocols, file transfer methods, validation procedures, and implementation milestones. The Integration Plan guides coordination activities among MMIS,

HIA, CMS, IQVIA, and other partners. It documents the processes used to exchange information with the MDR solution and serves as the roadmap for implementing reliable and secure data exchanges that support business operations and regulatory reporting requirements.

**v. Implementation Plan.** Specifies the activities, sequencing, resources, dependencies, readiness criteria, deployment procedures, and support activities required to transition the MDR solution into production operations. The plan describes how project teams prepare for deployment, execute cutover activities, support users during transition, and monitor system performance after go-live. It establishes the framework for coordinating technical, operational, training, conversion, communications, and organizational readiness activities across all project stakeholders. The Implementation Plan also identifies key milestones, decision points, contingency actions, transition support procedures, and post-deployment evaluation activities. This provides a roadmap for managing the transition from implementation to operational use while supporting a controlled and well-coordinated deployment process.

**vi. Pre-Operational Transition Plan.** Guides the MDR project from implementation activities into steady-state operations. The document evaluates organizational preparedness, operational readiness, staffing readiness, support processes, and system availability before production use. It identifies transition activities, completion criteria, operational dependencies, knowledge transfer requirements, support procedures, and readiness checkpoints that must be completed before go-live. The plan provides a structured approach for transferring responsibilities from implementation teams to operational support personnel while maintaining continuity of business functions.

**vii. Environment Configuration for All Remaining Environments.** Defines non-development environments, including testing, training, user acceptance testing, staging, and production environments. Each deliverable documents the architecture, infrastructure components, application settings, security configurations, connectivity requirements, access controls, monitoring capabilities, backup procedures, and deployment standards applicable to the environment.

The documentation establishes a repeatable framework for environment administration and provides detailed information needed to support system validation, training, deployment, and ongoing operations. The project team maintains configuration documentation throughout implementation to reflect approved updates and operational changes.

**viii. Code Migration and Deployment Processes.** Conveys how application changes progress through the implementation lifecycle, from development through production deployment. The document provides promotion procedures, version control practices, release preparation activities, approval requirements, deployment sequencing, rollback procedures, and post-deployment validation activities.

The document establishes controls for software updates, configuration changes, defect corrections, and system enhancements. These controls help maintain solution integrity and consistency across environments. It also defines the roles and responsibilities of technical teams involved in release and deployment activities.

The Code Migration and Deployment Processes document provides a repeatable framework for managing code promotion, release management, and production deployments throughout implementation and ongoing operations.

**ix. Development, Testing, and Pre-Implementation Deliverables and Work Products.** A comprehensive set of development, testing, and pre-implementation deliverables that support solution build, validation, and deployment readiness. These work products document the results of configuration activities, interface development, data conversion, test preparation, test execution, defect resolution, training preparation, operational readiness assessments, and deployment planning.

The deliverables provide evidence that project requirements have been translated into an operational solution and that the system has undergone appropriate validation prior to implementation. They also document key project decisions, testing outcomes, readiness assessments, stakeholder reviews, and approval activities conducted throughout the implementation lifecycle.

Collectively, these deliverables create a complete record of project execution and support operational readiness reviews, deployment decision-making, and production implementation activities.

**x. Contingency Plan.** Contains the actions that project teams and operational support personnel execute in response to events that could disrupt project activities, deployment activities, or ongoing operations. The document identifies potential scenarios that may affect system availability, data processing, integrations, implementation activities, or business operations and establishes response procedures for each scenario. It describes communication protocols, escalation paths, recovery activities, decision authorities, workaround procedures, and service restoration approaches. The plan supports business continuity by providing clear guidance for responding to unexpected events and reducing the operational impact of disruptions during implementation and production operations.

**xi. Cut-Over Plan.** Governs the activities required to transition the MDR solution from implementation into production operations. The document defines the deployment sequence and participant responsibilities. It also establishes transition checkpoints and identifies activities required before, during, and after production deployment. The plan coordinates system deployment, data migration, interface activation, operational readiness verification, stakeholder communications, and validation activities. It also documents decision points, contingency procedures, rollback criteria, and post-deployment monitoring activities. The project team uses this deliverable to support a controlled and well-coordinated transition into production while minimizing disruption to business operations.

**xii. Data Security Plan.** Specifies the security controls, procedures, and governance practices that protect MDR data throughout its lifecycle. The plan describes how we safeguard information during collection, transmission, processing, storage, archival, and disposal. It addresses access management, authentication, authorization, encryption, audit logging, monitoring, incident response, vulnerability management, and data retention practices. The document also describes how Conduent aligns security operations with applicable federal and

State requirements, healthcare privacy obligations, and organizational security standards. The Data Security Plan serves as the primary reference for protecting sensitive information and maintaining the confidentiality, integrity, and availability of data residing within the MDR solution.

**xiii. Test Execution and Results.** Records the scope of testing conducted, test scenarios executed, requirements validated, defects identified, corrective actions completed, and overall testing status. It provides objective evidence that the MDR solution performs according to approved requirements and design specifications. Our testing team captures test metrics, pass and fail rates, defect trends, resolution status, and readiness assessments within this deliverable. This document supports stakeholder review of testing outcomes and provides the information necessary to evaluate solution readiness for deployment and operational use.

**xiv. State Staff Training.** Familiarizes participants with MDR solution functionality, business processes, security responsibilities, reporting capabilities, operational procedures, and support processes. Trainers conduct training through approved methods and provide learning materials, demonstrations, hands-on exercises, and knowledge transfer activities that support operational readiness. The deliverable helps DHHS staff develop the skills and knowledge necessary to effectively use and support the MDR solution following implementation.

**xv. User Manuals.** Guides the daily operation and use of the MDR solution. The manuals include system functionality, navigation paths, business processes, workflows, data entry procedures, reporting capabilities, administrative functions, and troubleshooting procedures. The manuals also explain how users perform common tasks, interpret system information, resolve routine issues, and access available support resources. Our team organizes the manuals so that users can quickly locate relevant information and maintains the content as the solution evolves. User Manuals serve as a primary reference source for system users and support consistent, effective utilization of the MDR solution throughout the contract period.

**xvi. Delivery of Production-Ready System & Solution.** Represents the completion of requirements analysis, solution design, configuration, integration, data conversion, testing, training, security validation, and implementation activities.

The production-ready solution includes all approved functionality, interfaces, reports, workflows, security controls, and business processes required to support Nebraska's Medicaid Drug Rebate program. It also includes the operational components necessary for day-to-day use, including system administration capabilities, monitoring functions, user documentation, support resources, and deployment artifacts.

Prior to production deployment, we conduct validation activities to confirm approved requirements have been implemented, interfaces operate as designed, data conversion activities have been successfully completed, and operational teams are prepared to support the solution. The production-ready system establishes the baseline platform for ongoing operations, maintenance, and support.

**xvii. Business Continuity/Disaster Recovery Plan.** Includes the processes, procedures, and resources required to maintain critical business operations and recover system functionality following a disruption. The plan addresses potential events that could affect the availability of the MDR solution, including infrastructure failures, software issues, cybersecurity incidents, natural disasters, and other operational disruptions.

The BCDR Plan defines recovery strategies, backup and restoration procedures, communication protocols, escalation processes, recovery priorities, recovery time objectives, recovery point objectives, and testing requirements. It also identifies key personnel, roles, responsibilities, decision authorities, and response activities that support business continuity and service restoration.

We use the BCDR Plan as an operational guide for responding to service interruptions and restoring system operations within established recovery objectives. The plan is reviewed, updated, and tested periodically to support ongoing preparedness, operational resilience, and continuity of service.

**xviii. Infrastructure Plan.** A comprehensive overview of the infrastructure architecture, hosting environment, system components, network connectivity, storage resources, computing capacity, security services, monitoring capabilities, and operational support mechanisms required to operate the solution.

The Infrastructure Plan describes how application, database, integration, security, and supporting technology components interact within the MDR ecosystem. It also identifies environment specifications, scalability considerations, availability features, performance monitoring capabilities, backup services, and operational support processes.

The plan documents infrastructure dependencies, resource provisioning strategies, deployment architecture, and connectivity requirements that support implementation and ongoing operations. Our team uses the Infrastructure Plan to support operational readiness, maintenance activities, capacity planning, system growth, and long-term operational management.

## Deliverables – Milestone 3: Data/File Conversion and Migration

Milestone 3 includes the following deliverables. Our data management experts complete the following deliverables, submitting for DHHS review and approval prior to Go Live. Upon Contract award we meet with you to review and refine, as applicable, the scope and schedule for Milestone 3 deliverables.

**i. Data/File Conversion and Migration Plan.** Guides the approach for transferring historical and active Medicaid Drug Rebate data from the legacy environment to the new MDR solution. The plan describes the conversion strategy, migration activities, sequencing, governance, resource assignments, validation methods, and acceptance criteria used throughout the conversion and migration effort. It documents source systems, data sets, conversion scope, migration waves, dependencies, risk considerations, and reconciliation activities required to support a successful transition. The deliverable provides a detailed roadmap for moving data into the new environment while maintaining business continuity and supporting project timelines.

**ii. Data/File Conversion Test Plan.** Includes the testing approach, validation activities, reconciliation procedures, expected outcomes, defect management processes, and acceptance criteria for conversion testing. It describes the methods used to compare source and target data, evaluate transformation logic, identify discrepancies, and confirm that converted information supports operational, reporting, accounting, invoicing, and interface functions.

**iii. Conversion Mapping Guide.** Shows how data elements from legacy systems correspond to fields, tables, structures, and business objects within the MDR solution. The guide identifies source data locations, target destinations, transformation rules, data standardization requirements, default values, derived fields, validation logic, and exception handling procedures. It provides a detailed reference that supports conversion development, testing, troubleshooting, and audit activities. The deliverable also establishes traceability between source records and target records, allowing project teams and stakeholders to understand how data moves through the conversion process and how conversion decisions were implemented.

**iv. Perform the Data/File Conversion and Migration.** Transfers approved data from legacy environments into the MDR solution. Activities include data extraction, transformation, cleansing, loading, validation, reconciliation, and migration in accordance with approved conversion plans.

Conduent reviews source data, applies approved conversion rules, resolves identified data issues, conducts conversion trial runs, validates migration results, and prepares production-ready data for deployment. Throughout the conversion process, we document results, track defects and exceptions, perform reconciliation activities, and collaborate with DHHS stakeholders to review outcomes and confirm migration readiness.

Following final migration, we validate that converted data supports required business processes, reporting requirements, interfaces, rebate operations, accounting functions, and historical data access within the MDR solution. These activities help confirm data accuracy, completeness, integrity, and operational readiness prior to production deployment.

**v. Data/File Conversion and Migration Results Report.** Reports the outcome of all conversion and migration activities performed during implementation. The report summarizes data transferred from source systems into the MDR solution. It also presents validation, reconciliation, and quality review results. It describes the scope of the conversion effort, identifies data sources included in the migration, summarizes conversion execution activities, and documents any exceptions, discrepancies, corrective actions, or unresolved items requiring stakeholder review. The report also presents reconciliation results, conversion metrics, data quality findings, testing outcomes, and confirmation that converted data supports business, operational, reporting, accounting, invoicing, and interface functions within the new solution.

**vi. Obtain Acceptance from the State on Data/File Conversion and Migration Results.** Conduent facilitates the formal review and acceptance of completed data conversion and migration activities. Following delivery of the Data/File Conversion and Migration Results Report, data staff conduct review sessions with DHHS stakeholders to present migration outcomes, reconciliation findings, validation results, defect resolutions, and any outstanding observations.

The project team addresses stakeholder questions, provides supporting documentation, and demonstrates that converted data functions correctly within the MDR solution. After comments and identified issues have been resolved, we submit the final conversion acceptance package for State review and approval.

The acceptance package includes approved conversion deliverables, migration results, reconciliation summaries, validation evidence, and issue disposition documentation. State approval formally confirms completion of the data conversion and migration effort and supports progression to subsequent implementation and deployment activities.

## Deliverables – Milestone 4: Operational Readiness

In support of Milestone 4, the project team develops the following deliverables. Our team completes the following deliverables, submitting for DHHS review and approval. Milestone 4 occurs after Go Live, when all Go Live activities are completed, and other Milestone deliverables have been approved by DHHS. Upon contract award we meet with DHHS to review and refine, as applicable, the scope and schedule for Milestone 4 deliverables.

**i. Go Live Deliverables and Work Products.** Prepares and submits the collection of deliverables, documentation, approvals, validation results, deployment records, readiness assessments, and operational support materials required to support production deployment of the MDR solution. These work products document the completion of implementation activities and provide evidence that the solution has progressed through configuration, integration, conversion, testing, training, security reviews, and deployment readiness activities. Deliverables support stakeholder reviews, operational acceptance, and transition into production operations.

**ii. Completion of All Required Operational Readiness Review (ORR) Certification Artifacts.** Conduent completes and maintains the artifacts required to support DHHS's Operational Readiness Review with CMS. The package includes documentation and evidence demonstrating the MDR solution's operational readiness and compliance with the Conditions for Enhanced Funding, including applicable testing, security, training, data conversion, interface, operational support, and business continuity information. Conduent validates the completeness and traceability of the artifacts, addresses DHHS comments, and supports preparation for and participation in the CMS ORR presentation.

**iii. Fully Operational Production MDR Solution Providing All Agreed Functionality.** Delivery of a fully operational production environment that supports the approved business processes, functional capabilities, technical requirements, interfaces, reporting functions, security controls, and operational services defined for the MDR program. The production solution includes configured workflows, user access controls, external integrations, operational support mechanisms, and reporting capabilities required for day-to-day Medicaid Drug Rebate operations. Following deployment, the team verifies system availability and operational performance and transitions the solution into ongoing operations support and maintenance activities.

**iv. Online Survey for End User Feedback.** Gathers information related to user experience, system usability, training effectiveness, operational processes, support services, and overall satisfaction with the MDR solution. The team analyzes survey results, identifies areas for improvement, evaluates recurring themes, and shares findings with project stakeholders. The feedback supports continuous improvement activities and helps prioritize future operational enhancements.

**v. Begin Gathering Data to Support Required Metrics.** Following Go-Live, Conduent begins collecting, validating, monitoring, and reporting the operational and performance data needed for contract oversight and CMS certification. This includes measures of system performance, service delivery, processing volumes, support responsiveness, and the CMS- and State-specific outcomes and metrics established for the MDR solution. Conduent establishes data sources, reporting processes, baselines, and traceability to supporting evidence and maintains the required metrics through the CMS Certification Review. These reports support DHHS oversight, ongoing performance management, and the evidence presented to CMS.

**vi. Fully Functional Customer Support.** Assists DHHS personnel, product vendors, trading partners, and other authorized users of the MDR solution. Our customer support organization manages inquiries, investigates reported issues, provides technical and operational assistance, tracks service requests, and coordinates issue resolution activities. Customer support personnel use established procedures, support tools, escalation processes, and knowledge resources to address questions and resolve problems in a timely and organized manner.

**vii. Transition to Account Management.** Conduent completes a formal handoff from implementation leadership to the Account Manager following Go-Live. The transition covers key stakeholder contacts, contract commitments, open actions, operational priorities, performance measures, reporting expectations, and unresolved risks or issues. The Account Manager then serves as DHHS's primary contact for ongoing contract performance, service oversight, and executive communication, working with operational leads to address concerns and maintain continuity.

**viii. Turnover Plan.** Covers the activities, schedules, responsibilities, and transition procedures associated with the eventual transfer of services, operations, documentation, data, and knowledge at the conclusion of the contract period. This plan describes how the project team supports an orderly transition to DHHS and any successor contractor while minimizing operational disruption. The Turnover Plan addresses transition governance, resource coordination, documentation delivery, data transfer activities, operational knowledge transfer, and transition milestones necessary to support a successful handoff.

**ix. Knowledge Transfer Plan.** Includes the processes, activities, schedules, deliverables, and responsibilities associated with transitioning operational, technical, and business knowledge to DHHS and/or its designated successor contractor at contract closeout. The plan identifies knowledge domains, transfer methods, participants, schedules, documentation requirements, and completion criteria needed to support continued administration, maintenance, and operation of the MDR solution.

Conduent updates the plan throughout the contract period to reflect system changes, operational improvements, and transition requirements. Knowledge transfer materials include system specifications, configuration information, interface documentation, operational procedures, support materials, and training resources necessary to support ongoing operations.

The Knowledge Transfer Plan also establishes transition milestones, tracks knowledge transfer activities, documents outstanding items, and supports an orderly transfer of responsibilities. This approach helps minimize operational disruption, preserve institutional knowledge, and ensure continuity of service following contract turnover.

## Deliverables – Milestone 5: Certification

Milestone 5 includes the following deliverables, which Conduent submits to DHHS for review and approval. Certification planning and evidence development begin earlier in the project, but Milestone 5 occurs no sooner than six months after Go-Live, once all CMS certification activities are complete and CMS has approved the MDR solution and project. Upon contract award, Conduent works with DHHS to confirm and refine, as applicable, the scope and schedule for each deliverable.

### *i. CMS Certification Requirements*

**1) General.** Conduent prepares and maintains the documentation and supporting evidence needed to demonstrate the MDR solution's alignment with applicable CMS certification requirements. We coordinate certification-related activities with DHHS, maintain traceability to relevant requirements and project evidence, and update materials as needed throughout implementation and certification review.

**2) Pre-Operational Readiness Review.** Conduent works with DHHS to prepare for the CMS Operational Readiness Review by reviewing the planned presentation, demonstrations, and supporting evidence before the formal review. Walkthroughs and dry runs help confirm participant roles, identify gaps or needed updates, and address questions before the ORR materials are finalized for CMS.

**3) Operational Readiness Review.** Conduent supports DHHS during the CMS Operational Readiness Review by preparing and organizing the required documentation, evidence, presentations, and demonstrations. We participate in the review, explain how the MDR solution meets applicable CMS requirements and Conditions for Enhanced Funding, respond to reviewer questions, and provide follow-up information or updates requested by DHHS or CMS.

**4) Certification Review.** Conduent supports DHHS during the CMS Certification Review by organizing and updating the required certification evidence, with particular focus on the operational metrics used to demonstrate CMS- and State-specific outcomes. We maintain the required metrics and supporting documentation, present performance results, respond to reviewer questions, track findings, and provide supplemental information as requested. Conduent also addresses system or operational issues identified by CMS and updates the evidence package through completion of the certification process.

**5) Operations Metrics Reporting.** Conduent collects, validates, and reports the operational data needed to demonstrate performance against the required CMS- and State-specific outcomes and metrics established for the MDR solution. Reporting includes applicable measures such as system availability, processing volumes, interface activity, service levels, and support responsiveness. We maintain the supporting data and evidence through the CMS Certification Review, analyze trends and variances, and provide DHHS with reports that support certification and ongoing operational oversight.

### *ii. CMS Certification Support*

**1) CMS Certification Plan.** Organizes all activities associated with certification materials and task preparation and review. The plan defines the overall certification strategy, identifies required artifacts, defines roles and responsibilities, and aligns project deliverables with certification objectives. It documents review milestones, submission activities, evidence collection procedures, and stakeholder coordination activities. We use the plan as a management tool to monitor certification readiness, track progress, address gaps, and coordinate activities between project teams, DHHS stakeholders, and certification participants. The plan provides a roadmap that guides certification efforts throughout implementation, deployment, and operations activities.

**2) Assist the State with Advanced Planning Document (APD) Supporting Materials.** Preparation of information, analyses, technical documentation, project status information, implementation details, schedules, cost-related inputs, architecture descriptions, operational information, and other supporting materials needed for APD planning and preparation activities. Certification staff work closely with State stakeholders to compile and maintain current and accurate project information. As directed by DHHS, we also respond to requests for clarification or supplemental documentation. This support helps DHHS prepare complete and consistent APD submissions that accurately reflect project scope, objectives, implementation status, and operational plans.

**3) Assist the State with Operational Readiness Review (ORR).** Assists DHHS in preparing for and conducting ORR activities by supplying readiness documentation, testing results, conversion summaries, training records, operational procedures, recovery documentation, support plans, and other evidence demonstrating production readiness. Conduent participates in review sessions, conducts walkthroughs of operational processes, explains readiness artifacts, addresses reviewer questions, and supports the resolution of identified findings. We also help organize review materials and track the disposition of actions resulting from ORR activities. This support provides DHHS with the information needed to evaluate operational preparedness and make deployment decisions.

**4) Assist the State with Certification Review (CR).** Conduent supports Certification Review activities by preparing and organizing certification evidence, participating in review sessions, presenting solution capabilities, demonstrating system functionality, and responding to reviewer questions and requests for additional information. Our staff develops supporting documentation that traces project requirements to implemented functionality and provides evidence of testing, security validation, operational readiness, and performance results. Throughout the review process, we collaborate with DHHS to address findings, provide supplemental documentation, and document resolution activities. This support helps facilitate an efficient and well-documented certification review process.

**5) Metrics Reporting.** Encompasses metrics reports and dashboards that provide visibility into project performance, operational readiness, system operations, service delivery, testing progress, defect trends, implementation activities, and post-production performance. The reporting process collects data from project management, testing, support, and operational activities. It presents information in a format that supports oversight, decision-making, and

certification activities. Our team analyzes reported metrics, identifies trends, documents performance against established targets, and highlights areas that may require management attention. These reports provide DHHS and certification stakeholders with objective information regarding project status and operational performance throughout implementation and ongoing operations.

### VI.A.2.I.d.2 Operational Deliverables [RFP V.I.2]

**REQUIREMENT: RFP Section V.I.2**

After Go Live, when the MDR system and services are in production mode, ongoing deliverables and support will include the following, as well as other services as agreed. Billing for the ongoing deliverables and support will be based on the Cost Proposal Operational Costs section. Ongoing deliverables and support include, but may not be limited to:

a. Delivery of operational deliverables and services according to identified performance standards

i. Performance Standard Management Process and Report

b. Operations support for the system and system maintenance

i. Provide new software versions.

ii. Provide timely system fixes and resolution.

iii. Establish and perform regular maintenance schedule in collaboration with the State.

iv. System unavailability notifications.

v. Process for system improvements based on defects, feature enhancements or adjustments.

vi. Designate an account manager for the life of the contract.

vii. Annual independent third-party penetration test, including Open Web Application Security Project (OWASP) Top 10.

viii. Annual disaster recovery test.

ix. Annual independent third-party security controls assessment; and

x. Help Desk Support.

c. Management and staffing to support dispute management and resolution functions.

d. Management and staffing to support system and ad hoc reporting functions.

e. Management and staffing to support customer support functions.

f. Management and staffing to support ongoing training functions.

***Conduent delivers proven MDR operational excellence through accountable leadership, measurable performance, responsive customer service, and continuous program support.***

Based on our many years of Medicaid experience, we have institutionalized the expertise, skills, and understanding of the Medicaid mission enabling Conduent to staff our projects with highly qualified individuals. With Conduent, you have a long-term, low-risk, and high-reward partner.

Following go-live, Conduent provides comprehensive operational support services. We focus on system stability, performance, and continuous improvement. Our operational model supports business and technical objectives. We deliver services aligned with established performance standards.

Our team provides ongoing maintenance, support, and reporting services. We manage incidents, enhancements, and system availability activities. We support security, disaster recovery, and compliance activities. We provide dedicated operational leadership and customer support resources. We also support training, dispute resolution, and reporting functions. Our approach promotes reliable operations throughout the contract term.

## a. Delivery of Operational Deliverables and Services per Performance Standards

a. Delivery of operational deliverables and services according to identified performance standards
i. Performance Standard Management Process and Report

Conduent prepares a Performance Standard Management Process and Report throughout the contract lifecycle and reports performance results. These results document how service levels, key performance indicators (KPIs), contractual performance standards, and operational metrics are measured, monitored, reported, and managed.

The management process documents performance measurement methodologies, data sources, calculation formulas, reporting schedules, performance thresholds, escalation procedures, corrective action processes, and continuous improvement activities. Conduent collects and validates performance data from system operations, service management activities, support processes, and project deliverables to evaluate performance against established standards.

The report provides a summary of performance results for the reporting period, including achieved service levels, KPI results, trends, exceptions, root cause analyses, risk areas, corrective actions, and improvement initiatives. Supporting metrics, charts, and narrative explanations provide DHHS with visibility into operational performance, service quality, compliance with contractual requirements, and overall program health. Conduent updates and submits the report according to the DHHS-defined reporting schedule and uses the results to support performance reviews, governance meetings, and ongoing service improvement.

## b. Operations Support for the System and System Maintenance

b. Operations support for the system and system maintenance
i. Provide new software versions.
ii. Provide timely system fixes and resolution.
iii. Establish and perform regular maintenance schedule in collaboration with the State.
iv. System unavailability notifications.
v. Process for system improvements based on defects, feature enhancements or adjustments.
vi. Designate an account manager for the life of the contract.
vii. Annual independent third-party penetration test, including Open Web Application Security Project (OWASP) Top 10.
viii. Annual disaster recovery test.
ix. Annual independent third-party security controls assessment; and
x. Help Desk Support.

To provide stable, secure, and efficient operation of the MDR solution throughout the contract lifecycle, Conduent provides comprehensive system operations support and maintenance services. These services include but are not limited to the services required by the RFP and are described below.

Conduent monitors system health, availability, performance, interfaces, and processing activities to identify and address operational issues. Reported issues and service requests are tracked through established support processes, prioritized based on business impact, and managed through resolution and closure. Root cause analysis is performed for recurring issues. Corrective actions are implemented to improve system reliability and performance.

Conduent coordinates maintenance schedules with DHHS, captures and prepares planned changes, performs testing prior to deployment, and updates operational documentation as system components evolve. We regularly review service metrics, system performance data, maintenance activities, and issue trends, reporting to DHHS to support governance, continuous improvement, and ongoing operational readiness.

**i. Provide New Software Versions.** Conduent plans, develops, tests, and deploys new software versions that include product updates, security enhancements, regulatory changes, performance improvements, and approved functionality enhancements. Prior to deployment, Conduent validates new versions through established testing and change management processes and provides release documentation describing features, impacts, installation requirements, and deployment schedules.

**ii. Provide Timely System Fixes and Resolution.** Conduent manages system issues through established incident, problem, and change management processes. Reported defects and operational issues are prioritized based on severity and business impact, analyzed to determine root cause, corrected, tested, and deployed according to approved procedures. Status updates, resolution details, and corrective actions are documented and communicated to DHHS.

**iii. Establish and Perform Regular Maintenance Schedule in Collaboration with the State.** Conduent develops and maintains a recurring maintenance schedule in coordination with DHHS. Planned maintenance activities include software updates, security patching, infrastructure maintenance, performance tuning, database optimization, and other routine maintenance tasks. Maintenance schedules, activities, and expected impacts are communicated in advance and documented as part of ongoing operations management.

**iv. System Unavailability Notifications.** Conduent provides notification of planned and unplanned service interruptions through DHHS-approved communication procedures. Notifications include the nature of the outage, affected services, expected outage duration and targeted availability date/time, status updates, and any additional restoration information. Communication is provided to designated DHHS contacts and stakeholders throughout the outage lifecycle.

**v. Process for System Improvements Based on Defects, Feature Enhancements, or Adjustments.** Conduent manages system improvements through a structured review, prioritization, and implementation process. Enhancement requests, operational improvements, and defect trends are analyzed for business value, technical impact, and resource requirements. Approved improvements are incorporated into project planning, development, testing, and release activities and are tracked through established governance processes.

**vi. Designate an Account Manager for the Life of the Contract.** Conduent assigns a dedicated Account Manager who serves as the primary point of contact for DHHS throughout the contract lifecycle. The Account Manager coordinates operational activities, facilitates communications, manages issue escalation, supports governance meetings, oversees contract performance, and serves as a liaison between DHHS and the Conduent team.

**vii. Annual Independent Third-Party Penetration Test, Including OWASP Top 10.** Conduent engages an independent qualified third party to perform annual penetration testing of the solution and supporting environment. Testing includes assessment of application, network, and infrastructure security, as well as evaluation of vulnerabilities identified within the OWASP Top 10 and other relevant threat categories. Findings, risk ratings, remediation activities, and validation results are documented and provided to DHHS.

**viii. Annual Disaster Recovery Test.** Conduent conducts annual disaster recovery exercises to evaluate recovery procedures, system restoration capabilities, infrastructure resiliency, and operational readiness. Test activities validate recovery objectives, system functionality, data restoration processes, and failover procedures. Results, lessons learned, corrective actions, and supporting evidence are documented and shared with DHHS.

**ix. Annual Independent Third-Party Security Controls Assessment.** Conduent engages an independent security assessor to evaluate the effectiveness of administrative, technical, and physical security controls. The assessment reviews compliance with applicable security requirements, identifies potential risks or control weaknesses, and documents findings and recommendations. Conduent tracks remediation activities and provides assessment results and status updates to DHHS.

**x. Help Desk Support.** Conduent provides Help Desk services to receive, track, prioritize, troubleshoot, and resolve user-reported issues and service requests. Support personnel assist users with system access, functionality questions, incident reporting, and operational concerns. Help Desk activities are managed through documented procedures that include ticket management, escalation processes, status tracking, resolution reporting, and performance monitoring.

## c. Management and Staffing to Support Dispute Management and Resolution Functions

c. Management and staffing to support dispute management and resolution functions.

Conduent provides dedicated management personnel and qualified staff to support dispute management and resolution activities throughout the contract term.

We use a structured dispute management and resolution framework supported by experienced project leadership, contract management personnel, and subject matter experts (SMEs) dedicated to the Nebraska MDR project. The approach emphasizes early identification of issues, open communication, timely escalation, and collaborative problem-solving to address concerns before they adversely affect project objectives, schedules, costs, or service delivery.

Conduent maintains documented procedures for issue identification, tracking, escalation, resolution, and closure. We log disputes, assign ownership, prioritize based on business impact, monitor through governance processes, and review during project status and management meetings. When issues require executive attention, Conduent engages senior leadership to support decision-making and resolution.

Our Account Manager and Project Manager will serve as primary points of contact for dispute management activities, coordinating with DHHS leadership, project stakeholders, and other Conduent staff to facilitate issue resolution. Functional leads, technical leads, operations managers, and other SMEs participate as needed to provide analysis, recommendations, and corrective action plans for issues within their areas of responsibility.

This staffing and management approach provides DHHS with clear accountability, defined escalation paths, experienced resources, and consistent communication throughout the resolution process while supporting productive collaboration and continued project progress.

## d. Management and Staffing to Support System and Ad Hoc Reporting Functions

d. Management and staffing to support system and ad hoc reporting functions.

Conduent provides dedicated business analysts, reporting specialists, data analysts, database professionals, and SMEs, as needed, who support the Nebraska MDR project's system and ad hoc reporting needs. Our team will work closely with DHHS stakeholders to manage routine reporting requirements, develop new reports, respond to information requests, and support program oversight activities. Our reporting management approach includes requirements gathering, report development, data validation, quality review, deployment, maintenance, and ongoing user support. Throughout operations, our staff resources collaborate with business and technical stakeholders to define reporting format and production specifications, identify data sources, establish calculation methodologies, and document report content requirements.

For operational/system reporting, Conduent produces and maintains standard reports, dashboards, performance metrics, and management reports that provide visibility into program operations, system usage, workload trends, and business outcomes. Reporting support resources monitor report accuracy, investigate discrepancies, and update reporting artifacts as business requirements evolve.

For ad hoc reporting requests, Conduent assigns qualified analysts to assess requirements, develop queries and reports, validate results, and deliver requested information within established service timelines. Reporting support personnel also support audits, certification activities, program reviews, and executive decision-making by providing timely and accurate data analysis and reporting services.

Project leadership oversees reporting priorities, resource allocation, service levels, and stakeholder communications, providing clear accountability and responsive support for both ongoing and emerging reporting needs.

## e. Management and Staffing to Support Customer Support Functions

e. Management and staffing to support customer support functions.

Conduent provides a structured, dedicated customer support organization led by experienced customer service management personnel and staffed by customer service representatives (CSRs), Help Desk specialists, business analysts, system support personnel, and SMEs. This support structure provides users with a centralized point of contact for reporting issues, requesting assistance, obtaining system guidance, and resolving operational questions and issues.

Customer support management oversees service delivery, monitors performance metrics, manages escalations, coordinates resource assignments, and serves as a liaison with DHHS regarding service issues and support priorities. Support staff receive training on system functionality, business processes, policies, and operational procedures to provide accurate and consistent assistance.

Conduent provides tiered customer support services that include intake, troubleshooting, issue resolution, escalation management, status communication, and closure verification. Customer inquiries, incidents, and service requests are tracked through a ticket management system that documents activities, priorities, resolutions, and response times. When issues require specialized expertise, Tier 1 CSRs escalate to Tier 2 and/or Tier 3 technical resources, operations staff, developers, and business SMEs to investigate and resolve.

Customer service management staff reviews service trends, recurring issues, user feedback, and performance results to identify opportunities for service improvements and operational efficiencies.

## f. Management and Staffing to Support Ongoing Training Functions

f. Management and staffing to support ongoing training functions.

Conduent provides a dedicated training team led by a Training Manager and staffed by instructional designers, trainers, business analysts, system SMEs, and operational support personnel to support ongoing training, knowledge transfer, and user proficiency throughout operations. This team will work with DHHS to identify training needs, maintain training schedules, and support the ongoing development of user knowledge and system proficiency.

Our training management approach includes training needs assessment, curriculum development, course delivery, training material maintenance, and evaluation of training effectiveness. Training resources develop and update user guides, job aids, reference materials, recorded demonstrations, and other training materials that reflect system enhancements, business process changes, and policy updates.

Trainers deliver instructor-led sessions, virtual training, workshops, refresher courses, and targeted training for new users and existing staff. SMEs and business analysts provide specialized instruction on system functionality, workflows, reporting capabilities, and operational procedures, as needed. We track and review training activities, attendance records, training feedback, and course updates. Customer service management coordinates resource assignments, training priorities, and communications with DHHS, supporting a consistent, effective training program that promotes user adoption, operational readiness, and continued system proficiency throughout the contract lifecycle.

## VI.A.2.I.d.3 Due Dates and/or Completion [RFP V.I.3]

**REQUIREMENT: RFP Section V.I.3**

The vendor must establish due dates for all RFP Deliverables in the Integrated Master Project Schedule within three (3) weeks of Kickoff. All deliverable milestone dates must be reviewed and approved by the State.

a. Vendor to meet each of the following timeframes as indicated, unless otherwise approved by the State:

i. “Kickoff” via teleconference meeting to occur no later than two (2) weeks after the Contract Execution;

ii. User Acceptance Testing (UAT) Environment shall be completed and fully accessible to users according to the agreed updates in the Project Workplan.

iii. Go-live: Vendor shall perform and complete all tasks as outlined in Section (V) and the related attachments to deliver a system that has a production environment completed and fully accessible to users no later than eighteen (18) consecutive months after the Kickoff. The State highly desires completion to occur within twelve (12) consecutive months after the Kickoff but will consider a project timeline that is no longer than eighteen (18) consecutive months after the Kickoff.

iv. Go-live week on-site support.

v. Post-implementation review teleconference meeting to occur within two (2) weeks following go-live.

vi. Implementation plan as outlined in Section (V) to be submitted for State’s approval ninety (90) days prior to go-live.

vii. Maintenance, Operations and Support shall begin upon sign-off of go-live and shall continue throughout the duration of the contract and any subsequent optional renewals and any extension.

Successful implementation depends on disciplined planning and milestone management. We align project activities with approved schedules and priorities. We collaborate closely with the State throughout implementation. We provide transparency into progress, dependencies, and deliverables.

Our approach supports timely environment readiness and solution deployment. We establish and maintain a detailed integrated project schedule. We track milestones, deliverables, and implementation activities. We support readiness reviews before key project milestones. We provide go-live support and post-implementation assistance. These activities enable us to transition seamlessly into ongoing operations and support services.

Conduent has reviewed the deliverable due date criteria and timeframes provided in the RFP Section V.I.3. We agree to incorporate these timeframes and due dates for all RFP deliverables in the Integrated Master Project Schedule within three (3) weeks of Project Kickoff. We also agree that all deliverable milestone dates will be reviewed and approved by the State. Upon contract award, we will collaborate with the State to review and finalize MDR project deliverable timeframes and milestones.

# VI.A.2.II Technical Response – Part II [RFP VI.A.2.Part II]

**REQUIREMENT: RFP Section VI.A.2.Part II**

The bidder is to submit separate files for each of the following items indicated:

a. Completed Attachment A – MDR Functional Requirements

b. Completed Attachment B – MDR Technical Requirements

c. Requested samples

d. Narratives Requested in Section V

Note (For each section in the attachments, provide a brief executive summary of the proposed approach to satisfy all requirements within the respective requirements section. Respond to all requirements detailed in the attachments, unless noted. Failure to respond to a specific requirement, unless noted, may be the basis for elimination from consideration during the State's comparative evaluation.)

Conduent has submitted the required attachments, requested samples, and supporting narratives as separate proposal components in accordance with the RFP instructions.

- **Attachment A – MDR Functional Requirements.** Please refer to Section VI.A.2.II.a Completed Attachment A – MDR Functional Requirements, of our response for Conduent's completed responses to all functional requirements.
- **Attachment B – MDR Technical Requirements.** Please refer to Section VI.A.2.II.b1 Completed Attachment B – MDR Technical Requirements, of our response for Conduent's completed response to all technical requirements.
- **Requested Samples.** Please refer to the separately submitted Section VI.A.2.II.c.4 Security, Privacy, and Compliance Sample Reports, of our response for Conduent's sample deliverables and supporting documentation.
- **Narratives Requested in Section V.** Please refer to the following narrative sections of our Technical Response for Conduent's detailed approaches, methodologies, executive summaries, and supporting information addressing the requirements identified in Section V of the RFP:
  - Section VI.A.2.II.d.1, Project Initiation and Planning Narrative
  - Section VI.A.2.II.d.2, Requirements Validation and Demonstration Narrative
  - Section VI.A.2.II.d.3, Design and Configuration Narrative
  - Section VI.A.2.II.d.4, Development and Testing Narrative
  - Section VI.A.2.II.d.5, Data/File Conversion and Migration Narrative
  - Section VI.A.2.II.d.6, Training Narrative
  - Section VI.A.2.II.d.7, Pre-Implementation Narrative
  - Section VI.A.2.II.d.8, Implementation Narrative
  - Section VI.A.2.II.d.9, Post-Implementation Narrative
  - Section VI.A.2.II.d.10, Maintenance, Operations and Support Narrative
  - Section VI.A.2.II.d.11, Turnover Phase Narrative

Conduent has responded to the requirements contained within the referenced attachments and narrative sections and has provided the supporting documentation required for the State's evaluation.

## VI.A.2.II.a Completed Attachment A – MDR Functional Requirements

**REQUIREMENT:**
a. Completed Attachment A – MDR Functional Requirements

Conduent reviewed the requirements in Attachment A and provides all requested responses in accordance with the solicitation instructions.

The completed Attachment A is included as part of our proposal submission.

## VI.A.2.II.b Completed Attachment B – MDR Technical Requirements

**REQUIREMENT:**
b. Completed Attachment B – MDR Technical Requirements

Conduent reviewed the requirements in Attachment B and provides all requested responses in accordance with the solicitation instructions.

The completed Attachment B is included as part of our proposal submission.

# ATTACHMENT A - Functional Requirements

**RFP # 124528 ON**
**Medicaid Drug Rebate (MDR) System**
**State of Nebraska, Department of Health and Human Services**

**IMPORTANT:**

Please note that any additional costs must be captured only on the Cost Sheet and NOT within the response to the specification.
Failure to adhere to these instructions shall result in the bidder being deemed as "**Non-Responsive**".

## General Guidelines for Vendors

1. **Thoroughly Review Requirements:** Carefully read each requirement, including subpoints and links provided. Ensure responses clearly address each aspect of the requirement.
2. **Provide Supporting Details:** Each response should include clear descriptions, processes, tools, or diagrams demonstrating how the solution meets the requirement.
3. **Organize Responses:**
   - Use headings and subheadings to structure responses.
   - Include bullet points for clarity.
4. **Use Standards and Best Practices:**
   - Refer to relevant standards (e.g., Section 508, NIST, FIPS, HIPAA).
   - Provide details of certifications, tools, and industry-compliant processes.
5. **Clarity and Precision:**
   - Avoid vague language or ambiguous claims.
   - Use concise, professional terminology.
   - Ensure responses are tailored to DHHS requirements and align with federal and state guidelines.
6. **Supporting Artifacts:**
   - Include visuals such as diagrams, charts, and flowcharts where applicable.
   - Reference external documents or standards as appropriate.
7. **Testing and Validation:** Detail testing approaches, validation processes, and evidence that the solution meets outlined expectations.

## Specific instructions to complete **Functional Requirements**

Bidders are to refrain from providing a solution where that would result in additional fees and/or expressing that a feature or functionality is available at an additional cost.

This document contains tables for each Functional Requirement type. The requirement types are as follows:

| **Requirement Type** | **Range** |
|---|---|
| Invoice Management (IVM) | IVM-01 - IVM-76 |
| Accounting (ACC) | ACC-01 – ACC – 15 |
| Customer Support, Documentation, and Training (CDT) | CDT-01 – CDT-30 |
| Staffing and Resource (SAR) | SAR-01 – SAR-03 |
| Turnover and Contract Closeout (TCC) | TCC-01 – TCC-04 |
| Project Management and Implementation (PMI) | PMI-01 – PMI-24 |

For each requirement listed under the tables in this document, the bidder shall choose whether their solution "Met The Requirement" then choose the "Implementation Approach" and the "Describe Bidder's approach/ability to meet the requirement" by following the instructions provided for each requested information directly below.

Met The Requirements

Within each requirement there is a dropdown option to select three options to answer whether the bidder will meet the requirement or not. The available options to choose from and their descriptions are as follows.

| **Available Options** | **Description** |
|---|---|
| YES | The Bidder confirms that their solution meets the specified requirement |
| NO | The Bidder confirms that their solution does not meet their requirement |
| MET WITH DEVIATION | The Bidder Confirms that their solution meets the specified requirement with deviation taken to the specified requirement. (If this option is selected, then the bidder shall explain within the "Describe Bidder's approach/ability to meet the requirement" section how they plan to meet the requirement. |

Implementation Approach:

The Implementation Approach requested in this document can be described as the methodology that will be utilized by the bidder to meet the specific requirement. Within each requirement there is a dropdown option provided to select your Implementation Approach from which an option must be selected. The available options to choose from and their descriptions are as follows:

| Available Options | Description |
|---|---|
| Out of Box (OOB) | Indicates that the functionality is available in the solution without any modifications. |
| Customization | Refers to changes made to the base product to meet specific requirements. This may involve coding or other significant alterations |
| Configuration | Refers to adjustments or settings changes within the solution that do not require coding but adapt the product to meet requirements. |
| TPS | Met with third party software |
| NA | Not Available |

Describe Bidder's approach/ability to meet the requirement

As bidders prepare responses to each individual requirement, the responses are expected to address the individual requirement in a manner that demonstrates to DHHS that the bidder understands the requirement and how the bidder will meet the specific requirement. If the bidder's response simply repeats the requirement, acknowledges, or adds sales materials in the Bidder's response, DHHS will reserve the right to deem the response as a "Non-Responsive Solicitation Response". However, if needed to appropriately explain bidder's response, a mix of tables, graphical details, and written narrative is acceptable.

The bidder's response to each requirement must include confirmation and a detailed explanation for the Implementation Approach taken. Bidders shall capture any assumptions, risks, or dependencies related to fulfilling each individual requirement.

Provide specifics, such as:

- Tools or methods used.
- Estimated effort for customizations/configurations.

| Invoice Management (IVM) | |
|---|---|
| **Number** | **Requirement Description** |
| **IVM-01** | Solution must support automated generation of the Drug Rebate Electronic Invoice Files for each drug manufacturer with current rebate information, with the ability to generate and distribute electronically and on paper. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution automatically generates quarterly Medicaid Drug Rebate invoices using current CMS pricing information, rebate utilization data, and applicable business rules. The solution produces manufacturer-specific electronic invoice files in CMS-approved formats and supports electronic transmission to participating manufacturers. Invoice processing includes automated validation, quality assurance edits, and reconciliation before release, ensuring invoice accuracy and reducing manufacturer disputes. The solution also supports printed invoice generation when required by DHHS or manufacturers that require paper distribution, providing Nebraska with flexible, compliant invoice delivery options.

| | |
|---|---|
| **IVM-02** | Vendor must work with DHHS to develop routine extract files containing MDR data to be interfaced to DHHS's Medicaid enterprise data warehouse, with format, data elements, and frequency to be agreed upon by DHHS. These extracts will support drug rebate oversight and analysis by DHHS. The extracts will cover the following three domains:<br>a. Detailed claim level information on drug claims sent to MDR and included or excluded from rebate invoicing.<br>b. Manufacturer invoice level data on drug rebates invoiced, amounts disputed, and rebates collected.<br>c. NDC level drug reference information, including rebate status, unit rebate amounts, and other data elements utilized in rebate determination. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent works collaboratively with Nebraska DHHS during implementation to define the format, content, frequency, and transmission method for routine Medicaid Drug Rebate extract files supporting the State's Medicaid Enterprise Data Warehouse. Because the CMdS Rebate Administration solution maintains detailed operational and financial information throughout the rebate lifecycle, Conduent can develop configurable interface extracts that support Nebraska's reporting and analytical requirements.

The solution supports extraction of:

**a. Claim-Level Data.** Detailed rebate claim information, including claims included in and excluded from rebate invoicing, eligibility determinations, invoice status, and associated business rules.

**b. Manufacturer Invoice Data.** Invoice amounts, payments received, disputes, adjustments, collections, accounts receivable balances, and manufacturer activity.

**c. NDC Reference Data.** NDC-level rebate information, including rebate eligibility, Unit Rebate Amounts (URAs), manufacturer information, drug reference data, and other data elements supporting rebate determination and reporting.

Conduent's configurable reporting and interface capabilities allow Nebraska to define extract layouts and schedules that support enterprise reporting while minimizing custom development.

| | |
|---|---|
| **IVM-03** | Solution must automatically accurately calculate compound interest due on quarterly rebate amounts per Federal Regulations. Interest must be itemized at the NDC/line level. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution automatically calculates interest on outstanding rebate balances in accordance with CMS requirements using applicable 13-week Treasury Bill investment rates, invoice postmark dates, and payment receipt dates. Interest calculations are maintained at the NDC line-item level and reflected throughout accounts receivable, payment allocation, invoicing, reconciliation, and reporting processes. Automated calculations improve accuracy, eliminate manual effort, and provide Nebraska with complete visibility into outstanding interest obligations throughout the rebate lifecycle. Our solution compounds interest, including state quarterly compounding and compliance with applicable Federal regulation governing compound interest.

| | |
|---|---|
| **IVM-04** | Solution must provide the capability to transmit detailed drug claim listings (CLD) to manufacturers electronically using federal and state defined formats. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent meets this requirement. The CMdS Rebate Administration solution supports electronic transmission of detailed rebate information associated with manufacturer invoices and maintains complete claim-level rebate information used throughout the invoicing and reconciliation process. Conduent works with Nebraska to implement federally compliant electronic exchange formats and transmission methods that support efficient manufacturer communications while protecting confidential Medicaid information. This includes Claim Level Detail (CLD) file creation and federal and state-defined formats.

| | |
|---|---|
| **IVM-05** | Solution must limit invoicing of drugs to those that are manufactured by companies on the CMS listing of manufacturers with drug rebate agreements (except as directed by DHHS). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution validates manufacturer eligibility using current CMS rebate reference information and automatically limits invoice generation to manufacturers participating in the Medicaid Drug Rebate Program unless otherwise directed by Nebraska DHHS. Automated validation against CMS reference data prevents invoices from being issued to ineligible manufacturers while maintaining compliance with federal rebate requirements. This automated validation reduces manual review, improves invoice accuracy, and minimizes unnecessary manufacturer disputes. exceptions.

| | |
|---|---|
| **IVM-06** | Solution must provide the capability to include and exclude claims from the drug rebate invoice cycle based on DHHS defined criteria (e.g. labeler, provider, members, drug, etc.). The solution shall also provide a detailed report, to be provided with the Technical Response, which outlines excluded claims from the drug rebate invoice cycle process. The report must include the business reason(s) why each claim was excluded from the invoice process. The report must be available on demand for DHHS staff to retrieve by invoiced quarter. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution uses configurable business rules to determine rebate eligibility and supports Nebraska-defined inclusion and exclusion criteria throughout the rebate invoicing process. Automated claim validation identifies claims that qualify for invoicing while excluding claims that do not satisfy established business rules. Comprehensive reporting identifies excluded claims and documents the applicable exclusion reason, allowing Nebraska staff to review, validate, and reconcile rebate eligibility before invoices are finalized. Reports are available on demand and support operational oversight, quality assurance, and audit readiness. The report must be available on demand for DHHS staff to retrieve by invoiced quarter.

| | |
|---|---|
| **IVM-07** | Solution must provide the capability to hold or suspend the issuance of a drug rebate invoice (electronically and paper) based on DHHS defined criteria (e.g. labeler, invoice amount, variances between paid claim information and CMS rebate information, etc.) to allow DHHS to remediate any issues or discrepancies before the invoice is generated. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's invoice validation process incorporates multiple automated quality assurance reviews before invoice release, allowing Nebraska to identify and resolve discrepancies before manufacturers receive invoices. During invoice preparation, the solution identifies validation exceptions, invoice discrepancies, and data quality issues requiring review, enabling authorized users to resolve outstanding issues before invoice generation and distribution. This controlled review process improves invoice accuracy, reduces manufacturer disputes, and protects rebate revenue.

| | |
|---|---|
| **IVM-08** | Solution must accept and store data for physician administered drugs (e.g., J codes), as directed by DHHS for rebate processing. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution supports rebate processing for physician-administered drugs and maintains detailed utilization information required for rebate invoicing, as directed by DHHS for rebate processing. The configurable architecture enables Nebraska to incorporate physician-administered drug claims into rebate processing in accordance with State business rules and CMS requirements while maintaining complete claim, NDC, and manufacturer information throughout the rebate lifecycle.

| | |
|---|---|
| **IVM-09** | Solution must provide the capability of an automatic default on the unit rebate amount to the most recent CMS known Unit Rebate Amount. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution utilizes current CMS Unit Rebate Amount (URA) information throughout rebate calculation, invoice generation, reconciliation, payment allocation, and reporting. When calculating rebates, the solution applies the most current CMS rebate information available for each eligible National Drug Code, helping ensure invoice accuracy and compliance with federal rebate requirements while minimizing manual intervention and calculation errors.

| | |
|---|---|
| **IVM-10** | Solution must have the capability to automatically determine the amount of rebate due from each manufacturer, based on quantity of units paid for each NDC (both original and adjusted claims), rebate amounts, data specific interest rate and prior period adjustments, per data received from CMS and DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution automatically calculates manufacturer rebate obligations by combining CMS Unit Rebate Amounts (URAs), Nebraska utilization data, original and adjusted claims, prior period adjustments, and applicable interest calculations. The solution imports CMS pricing information and rebate reference files, validates rebate-eligible utilization, performs required unit conversions, applies prior period adjustments, and generates manufacturer invoices using automated calculation logic. Comprehensive validation and invoice audits improve calculation accuracy, reduce manual effort, and minimize manufacturer disputes while ensuring compliance with federal Medicaid Drug Rebate Program requirements.

| | |
|---|---|
| **IVM-11** | Solution must automatically generate delinquent (38 and 68 day notice) letters to manufacturers who have not paid an invoice or have an outstanding balance. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution tracks manufacturer payment status, outstanding balances, accounts receivable, and delinquent invoices throughout the rebate lifecycle. The solution supports automated identification of overdue accounts and maintains manufacturer correspondence associated with collections and dispute management. This integrated approach enables Nebraska to efficiently monitor delinquent accounts and initiate collection activities while maintaining complete documentation of manufacturer communications.

| | |
|---|---|
| **IVM-12** | Solution must maintain and display original and corrected invoice records for reporting purposes. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution preserves complete invoice history throughout the rebate lifecycle, including original invoices, prior period adjustments, corrections, payment activity, disputes, interest, and revised balances. Users can view current and historical invoice information through the graphical user interface and generate reports showing original and corrected invoice values, providing complete auditability and supporting reconciliation, financial reporting, and future rebate processing activities.

| | |
|---|---|
| **IVM-13** | Solution must maintain all historical drug rebate and invoice information to accommodate prior period adjustment processing. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution maintains complete historical rebate, invoice, payment, adjustment, and accounts receivable information to support ongoing prior period adjustment (PPA) processing. Historical invoice data, manufacturer responses, ROSIs, PQAS transactions, payment allocations, disputes, and prior-period corrections remain available throughout the life of the system, enabling Nebraska to accurately process adjustments while maintaining complete financial and audit history.

| | |
|---|---|
| **IVM-14** | Solution must generate invoices for provider administered drugs billed on professional and institutional claims. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution supports rebate processing for physician-administered drugs and other eligible professional and institutional claims as directed by Nebraska DHHS. The configurable architecture enables Nebraska to include provider-administered drug utilization within rebate processing while applying the same validation, invoicing, payment allocation, reconciliation, and reporting capabilities used for pharmacy claims.

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| **IVM-15** | Solution must meet federal drug rebate format and content requirements and display, at a minimum, the following information on all drug invoices. Final content will be affirmed with vendor during implementation sessions:<br>a. Manufacturer name<br>b. Manufacturer address<br>c. Invoice number<br>d. Date invoice created<br>e. Period covered<br>f. OMB Format Number<br>g. NDC number<br>h. Drug name<br>i. Messages<br>j. Rebate amount per unit<br>k. Total units reimbursed per NDC<br>l. Total rebate claimed per NDC<br>m. Total reimbursement amount<br>n. Grand totals<br>o. Third Party Liability (TPL) portion paid Plan |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution generates rebate invoices that comply with CMS-required invoice formats and content requirements. Manufacturer invoices include detailed rebate information derived from CMS reference data and Nebraska utilization records, including manufacturer information, invoice identifiers, invoice period, NDC information, drug descriptions, Unit Rebate Amounts, utilization units, rebate calculations, totals, and supporting messages. The solution's configurable invoice generation process allows Nebraska and Conduent to finalize invoice content during implementation while maintaining compliance with current federal requirements.

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| **IVM-16** | Solution must apply basic file validation (e.g., manufacturer data, unit dose and measure conversion) provided by CMS, used in generating rebate invoices, to confirm that the information received is complete and accurate. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution performs comprehensive automated validation of CMS rebate reference files and Nebraska utilization data before invoice generation. Validation includes manufacturer eligibility, NDC reference information, Unit Rebate Amounts, unit-of-measure conversions, claim edits, invoice audits, and business rule verification. These automated quality assurance processes improve invoice accuracy, reduce processing errors, and minimize manufacturer disputes while ensuring complete and accurate rebate invoices.

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| **IVM-17** | Solution must generate and provide electronic files of all rebate invoices, prior period adjustments and collections by NDC on a quarterly basis in a format defined by DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent meets this requirement. Our solution generates electronic rebate files containing invoice information, prior period adjustments, payment collections, and related NDC-level detail. Conduent works with Nebraska DHHS during implementation to define file layouts, formats, transmission methods, and schedules that support State operational and reporting requirements. The configurable reporting and interface capabilities allow Nebraska to receive quarterly electronic files containing complete rebate activity while minimizing manual processing and supporting downstream financial and analytical systems.

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| **IVM-18** | Solution must monitor drug rebate information to determine if any URA is zero, and if more than two quarters have a URA of zero, the solution must issue an alert prior to invoice generation to provide sufficient time for research, analysis, and resolution. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution validates CMS Unit Rebate Amount (URA) information throughout invoice preparation and performs multiple automated quality assurance checks before invoices are released. Validation reports identify rebate anomalies requiring review, allowing Nebraska to resolve data issues before invoice generation. These automated controls improve invoice accuracy and reduce downstream manufacturer disputes.

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| **IVM-19** | Solution must record and track manufacturer disputes of drug rebate invoices at the NDC detail level for encounter and FFS claims. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution maintains complete dispute management capabilities at the 11-digit NDC level throughout the rebate lifecycle. The solution records manufacturer disputes, disputed units, Unit Rebate Amount adjustments, payment variances, prior period adjustments, and resolution activities while maintaining complete accounts receivable history. Rebate specialists can review, research, document, and resolve disputes using integrated workflows that support both fee-for-service (FFS) and managed care rebate processing. Detailed online inquiry and reporting provide Nebraska with complete visibility into dispute status, outstanding balances, manufacturer communications, and final resolution, improving collections while strengthening program oversight.

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| **IVM-20** | Vendor must perform all aspects of the formalized dispute resolution process, with direction and approval of DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent provides comprehensive dispute management services throughout the Medicaid Drug Rebate Program, working collaboratively with Nebraska DHHS to investigate, document, resolve, and monitor manufacturer disputes. Our experienced rebate specialists manage the complete dispute lifecycle, including receipt and review of manufacturer responses, research of disputed claims, reconciliation of utilization and pricing data, preparation of supporting documentation, coordination with manufacturers, and implementation of approved resolutions. Throughout the process, Nebraska retains oversight and approval authority while Conduent provides the operational expertise needed to resolve disputes quickly, improve collections, and minimize outstanding accounts receivable. Our integrated workflows and disciplined operational processes reduce administrative burden while ensuring compliance with CMS requirements.

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| **IVM-21** | Solution must maintain an automated drug rebate tracking system for disputes that identifies and tracks non-responsive manufacturers and allows responding manufacturers to submit disputes electronically. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains a comprehensive dispute tracking system that records manufacturer disputes, payment status, outstanding balances, correspondence, and dispute resolution activities at the manufacturer and NDC levels. Integrated workflow tools enable rebate specialists to monitor outstanding disputes, identify manufacturers that have not responded to invoices or requests for information, and manage follow-up activities throughout the collection process. The solution maintains complete electronic records supporting dispute resolution and provides Nebraska with online visibility into dispute status, aging, payment activity, and manufacturer communications.

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| **IVM-22** | Vendor must support DHHS in dispute resolution meetings (informal, appeal, judicial review, etc.) with manufacturers or labelers, including providing staff to participate with DHHS in meetings. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent provides experienced Medicaid rebate specialists to support Nebraska throughout the formal dispute resolution process, including informal discussions, manufacturer meetings, appeals, and other dispute resolution activities as directed by DHHS. Our team prepares supporting documentation, researches disputed claims, analyzes utilization and rebate calculations, develops issue summaries, and participates in meetings with manufacturers to present technical and operational information. Drawing on more than 27 years of Medicaid Drug Rebate Program experience, Conduent serves as a trusted advisor, helping Nebraska resolve disputes efficiently while protecting rebate revenue and maintaining productive manufacturer relationships.

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| **IVM-23** | Solution must maintain a history of the data used to support DHHS in case of a drug manufacturer dispute over the rebate invoice. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our CMdS solution maintains complete historical records supporting every rebate invoice, including original claims, invoice details, payment activity, prior period adjustments, dispute history, manufacturer responses, interest calculations, and supporting reference data. Historical records remain available throughout the rebate lifecycle, allowing Nebraska staff to research prior transactions, validate rebate calculations, and provide complete supporting documentation during manufacturer disputes or audits. This comprehensive historical repository strengthens program integrity while improving the efficiency and accuracy of dispute resolution activities.

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| **IVM-24** | Solution must support manual rebate updating, overriding the CMS quarterly update, for specific drugs and at the manufacturer (labeler) level across all NDCs for that manufacturer. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution provides authorized users with configurable administrative capabilities that support approved rebate updates, prior period adjustments, and manufacturer-specific corrections when necessary. Controlled administrative functions operate within established security, configuration management, and audit controls to ensure Nebraska can implement approved rebate corrections while maintaining complete transaction history and regulatory compliance. All updates are tracked through the system's audit capabilities, preserving complete accountability for every change affecting rebate calculations or invoice processing.

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| **IVM-25** | Solution must perform adjustments when corrections are made to paid claims or when billing errors are discovered through the rebate dispute resolution process. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution automatically supports rebate adjustments resulting from corrected claims, prior period adjustments, manufacturer disputes, payment corrections, and billing errors. Rebate specialists review adjustment requests, validate supporting documentation, recalculate affected invoices when appropriate, and update accounts receivable balances while maintaining complete historical records of all changes. This integrated adjustment process improves financial accuracy, preserves audit history, and ensures Nebraska's rebate collections remain accurate throughout the life of each invoice.

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| **IVM-26** | Solution must allow rebate adjustments and payments to be applied at the NDC level and to report accordingly. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution applies payments, adjustments, disputes, prior period corrections, and interest calculations at the 11-digit NDC level. As rebate specialists allocate payments and process adjustments, the solution immediately updates accounts receivable balances and maintains detailed reporting by manufacturer, invoice, program, and NDC. Nebraska users can generate reports reflecting current and historical payment and adjustment activity, providing complete financial transparency and supporting reconciliation, audit, and management reporting requirements

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| **IVM-27** | Solution must provide drug rebate adjustment reason code(s) associated to each adjustment. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent records adjustment activity together with the supporting transaction information needed to document the reason for each rebate adjustment. Adjustment history, payment activity, disputes, prior period corrections, and related financial transactions remain available through online inquiry and reporting, providing Nebraska with complete visibility into adjustment processing and supporting audit and reconciliation activities.

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| **IVM-28** | Solution must link all adjustment activity to the quarter in which the original invoice was generated. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains complete invoice history and prior period adjustment records throughout the rebate lifecycle. Adjustments remain associated with the original invoice, manufacturer, rebate quarter, and NDC, preserving complete financial traceability and supporting accurate accounts receivable management, reconciliation, reporting, and dispute resolution. This historical linkage ensures Nebraska can readily identify the origin of every adjustment while maintaining complete auditability across multiple rebate cycles.

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| **IVM-29** | Solution must migrate, convert, and manage the transfer of historical rebate data provided by DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent follows a structured data conversion and migration methodology that validates, converts, reconciles, and loads historical rebate information into the CMdS Rebate Administration solution while preserving complete financial and operational history. During implementation, Conduent works collaboratively with Nebraska DHHS to analyze source data, develop mapping specifications, perform multiple validation and reconciliation cycles, resolve conversion exceptions, and confirm data integrity before production deployment. Historical invoices, payments, prior period adjustments, disputes, manufacturer information, accounts receivable balances, and related rebate data remain available following conversion, enabling uninterrupted program operations and supporting future reconciliation, reporting, and audit activities.

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| **IVM-30** | Solution must obtain and maintain CMS quarterly drug rebate information necessary for rebate invoicing and CMS federal reporting, including but not limited to:<br>a. Unit Rebate Amounts<br>b. Labeler Information<br>c. Unit Rebate Offset Amounts<br>d. Applicable, accrued labeler interest<br>e. Guaranteed Net Unit Rebate Prices (GNUPs) by NDC when applicable. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution automatically imports, validates, and maintains CMS quarterly rebate reference data required to support rebate invoicing, payment reconciliation, and federal reporting. The solution maintains current Unit Rebate Amounts (URAs), Unit Rebate Offset Amounts (UROAs), labeler information, Treasury interest rates, GNUP, and other CMS reference files used throughout the rebate lifecycle. This reference information is automatically applied during rebate calculations, invoice generation, payment allocation, and reporting, ensuring Nebraska uses the most current federal rebate information while reducing manual processing and improving invoice accuracy.

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| **IVM-31** | Solution must accept and maintain information provided by DHHS necessary for the generation of accurate rebate invoices, which includes, but is not limited to the following:<br>a. Claims utilization information<br>b. Managed Care Organization (MCO) encounter information<br>c. Drug description information<br>d. Nebraska Medicaid Provider information<br>e. National Provider Identification (NPI) information<br>f. 340B modifiers at a claim level when applicable |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution accepts and maintains the operational and reference data necessary to generate accurate Medicaid Drug Rebate invoices. The configurable architecture supports the import and management of claims utilization, managed care encounter data, drug reference information, provider information, and other State-defined data required for rebate processing. Automated validation verifies the completeness and integrity of incoming data before invoice generation, while comprehensive audit capabilities maintain full traceability throughout the rebate lifecycle. This approach improves invoice accuracy, strengthens program integrity, and supports Nebraska's evolving business requirements.

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| **IVM-32** | Solution must include the capability to maintain multiple effective date spans for drug manufacturer records to accommodate periods where a manufacturer becomes ineligible to participate in the drug rebate program as identified by CMS or DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution maintains manufacturer eligibility information using CMS reference data and applies manufacturer participation status during rebate eligibility determination and invoice generation. The configurable reference data architecture supports ongoing maintenance of manufacturer information while ensuring invoices are generated only for eligible manufacturers participating in the Medicaid Drug Rebate Program. This approach improves compliance with CMS requirements while reducing invoice errors and unnecessary manufacturer disputes.

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| **IVM-33** | Solution must update drug rebate information related to a claim when claim adjustments are provided by DHHS. Further discussion will be necessary with Department staff during implementation. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution automatically processes claim adjustments received from Nebraska DHHS and updates rebate calculations, prior period adjustments, accounts receivable balances, invoice history, and reporting accordingly. As corrected claims are received, the solution recalculates affected rebate transactions while preserving complete historical records and maintaining traceability to the original invoice. This automated adjustment process improves financial accuracy, minimizes manual intervention, and ensures Nebraska's rebate records remain synchronized with current claims information.

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| **IVM-34** | Solution must convert between the drug database unit and quantity used for invoicing to those used by CMS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution automatically performs unit-of-measure conversions during rebate processing to ensure claims utilization aligns with CMS rebate calculation requirements. Automated conversion routines support accurate Unit Rebate Amount calculations, invoice preparation, and payment reconciliation while eliminating manual conversions and reducing processing errors. These automated quality controls improve invoice accuracy and support compliance with federal Medicaid Drug Rebate Program requirements.

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| **IVM-35** | Solution must maintain a complete history of the claims information provided by DHHS to support the drug rebate invoice process. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution maintains complete historical claim information supporting every rebate invoice generated. Original claims, adjusted claims, rebate calculations, invoice history, payment activity, disputes, prior period adjustments, and related financial transactions remain available throughout the life of the system. This comprehensive historical repository supports reconciliation, audit activities, manufacturer disputes, financial reporting, and future rebate processing while providing Nebraska with complete operational transparency.

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| **IVM-36** | Solution must capture and store unit rebate amount (URA) data from CMS then identify, calculate, and apply modifications as needed. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution imports and maintains CMS Unit Rebate Amount (URA) files and applies current URAs during rebate calculation and invoice generation. The solution supports prior period adjustments, manufacturer corrections, and approved rebate modifications while maintaining complete historical records of all rebate calculations. Automated validation ensures URA information is applied consistently across invoice generation, payment allocation, reporting, and reconciliation activities, improving financial accuracy and reducing manual processing.

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| **IVM-37** | Solution must allow access to claim level drug rebate information on-line. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution provides authorized Nebraska users with secure online access to detailed rebate information through an intuitive graphical user interface. Users can review claim-level rebate data together with invoice status, payment activity, disputes, accounts receivable balances, and related operational information using role-based security and drill-down inquiry capabilities. This real-time online access improves operational efficiency, supports timely research and dispute resolution, and provides Nebraska staff with complete visibility into rebate processing activities.

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| **IVM-38** | Solution must generate a report listing all adjustments made to drug rebate invoices, with the capability to be filtered at least by labeler, time period, invoice number, NDC, number of units adjusted, total dollar amount adjusted, and adjustment code. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution includes more than 50 standard reports together with configurable reporting capabilities that allow Nebraska to monitor rebate activity throughout the invoice lifecycle. Reports may be filtered by manufacturer, labeler, NDC, invoice, quarter, payment status, dispute activity, and other operational criteria to support financial reconciliation and audit activities. Historical adjustment activity is retained and available for reporting through the system's integrated accounts receivable and rebate management functions. Conduent will configure or develop additional reports, as necessary, to meet Nebraska's specific operational and reporting requirements.

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| **IVM-39** | Solution must generate a report listing claims paid for any terminated drugs, in a specific quarter. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution maintains comprehensive drug reference information together with claims utilization and rebate processing history, enabling Nebraska to generate reports identifying claims associated with specific drug products and reporting periods. Using configurable reporting criteria and current drug reference data, Nebraska users can identify rebate activity associated with discontinued or terminated drugs, supporting program oversight, financial analysis, and compliance activities. Conduent will work with DHHS during implementation to configure reporting criteria that meet Nebraska's operational requirements.

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| **IVM-40** | Solution must generate a report listing of all claims paid for a specific labeler, in a specific quarter. A sample of the report must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution provides comprehensive reporting and online inquiry capabilities that allow Nebraska to generate reports using user-defined selection criteria, including labeler and invoice quarter. Because the solution maintains detailed claim, manufacturer, invoice, and NDC information throughout the rebate lifecycle, authorized users can produce reports identifying claims associated with a specific labeler for a selected rebate quarter. Reports are available through the graphical user interface for online inquiry and export in multiple formats. Conduent will configure the report format during implementation and will provide the required report sample with the Technical Response.

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| **IVM-41** | Solution must generate a report listing the total amounts billed, collected, adjusted, interest accrued, credits, disputed, not invoiced, and balance due, for all labelers, broken down by quarter and program. A sample of the report must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution maintains comprehensive accounts receivable, payment, adjustment, dispute, and interest information throughout the rebate lifecycle and includes more than 50 standard operational and financial reports. Nebraska can generate reports summarizing billed amounts, collections, adjustments, interest, credits, disputes, outstanding balances, and accounts receivable by manufacturer, rebate program, and quarter. Configurable reporting enables Nebraska to organize information according to its financial and operational reporting requirements while supporting reconciliation, collections, and executive oversight. Conduent will provide the required sample report with its Technical Response.

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| **IVM-42** | Solution must generate a report listing current outstanding balances or credits of a labeler code at the invoice level. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains real-time accounts receivable information at the manufacturer, invoice, and NDC levels. Nebraska users can generate reports showing outstanding balances, credits, payments, adjustments, interest, and dispute activity for a selected labeler at the invoice level. Online inquiry and configurable reporting provide immediate visibility into current receivable status and collection activity, improving financial oversight and supporting efficient rebate operations.

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| **IVM-43** | Solution must generate a report listing current outstanding balances or credits of a labeler code at the NDC level. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution maintains complete financial accountability at the 11-digit NDC level and provides online reporting of current outstanding balances, credits, payments, disputes, adjustments, and interest. Because all financial activity is maintained at the NDC level, Nebraska users can generate detailed reports supporting reconciliation, collections, audit activities, and manufacturer dispute resolution.

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| **IVM-44** | Solution must generate a report (38 and 68 day reports) listing the total amounts for all labelers that are a specified number of days past due, broken down by invoice number. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution continuously tracks invoice aging, payment status, outstanding balances, and manufacturer accounts receivable. Reporting capabilities enable Nebraska to identify delinquent invoices, outstanding balances, and manufacturer payment activity using configurable aging criteria. These reports support proactive collections management, financial oversight, and manufacturer follow-up activities while improving rebate collection performance.

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| **IVM-45** | Solution must generate a report listing the outstanding balances by labeler for all invoices and PQAS (Prior Quarter Adjustment Statement) sent in a specified quarter. A sample of the report must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

We maintain complete invoice, PQAS, payment, adjustment, and accounts receivable history by manufacturer and NDC. Nebraska users can generate reports showing outstanding balances associated with rebate invoices and prior period adjustments for a selected rebate quarter, supporting financial reconciliation, collections management, and audit activities. Conduent will provide the requested report sample with the Technical Response.

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| **IVM-46** | Solution must generate a report listing total amount of Drug Rebate deposits, by deposit, for a user-requested time period. A sample of the report must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution records all rebate payments, deposits, interest, adjustments, and accounts receivable transactions, providing Nebraska with comprehensive financial reporting throughout the rebate lifecycle. Users can generate deposit reports for user-defined reporting periods, supporting reconciliation, financial management, audit readiness, and federal reporting. Reports are available through the graphical user interface for online inquiry and export. Conduent will provide the requested sample report with the Technical Response.

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| **IVM-47** | Solution must generate a report of all the Unit Rebate Offset Amounts that occurred in the quarter plus any changes to previous quarters' Unit Rebate Offset Amounts. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains CMS rebate reference information, including Unit Rebate Offset Amounts (UROAs), and preserves historical rebate data supporting quarterly invoice generation and prior period adjustments. Reporting capabilities allow Nebraska to review current rebate information together with historical rebate activity and approved adjustments affecting previous rebate periods, supporting reconciliation and financial reporting.

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| **IVM-48** | Solution must generate required Federal expenditure reporting for the CMS 64 which is summations of adjustments (credits and debits), rebates billed and payments that occurred in the quarter. Each amount is summed by the quarter where the first invoice was recorded. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution automatically generates CMS-64.9R reporting using rebate invoicing, collections, prior period adjustments, accounts receivable, and payment activity maintained throughout the rebate lifecycle. Reports summarize rebates billed, payments received, credits, debits, and adjustments by the quarter associated with the original invoice, supporting accurate federal financial reporting and reconciliation. Nebraska users can generate reports online and export them in multiple formats to support CMS reporting and financial management activities.

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| **IVM-49** | Solution must generate a report listing invoices created for a specified invoice quarter or labeler. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution provides robust reporting and online inquiry capabilities that enable Nebraska users to generate invoice reports using configurable selection criteria, including invoice quarter, manufacturer, labeler, rebate program, and NDC. Because invoice history is maintained throughout the rebate lifecycle, users can quickly retrieve current and historical invoice information to support reconciliation, collections management, manufacturer inquiries, audits, and financial reporting.

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| **IVM-50** | Solution must generate a report listing the amount billed, paid, adjusted, and outstanding for all labelers. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains complete accounts receivable information for every manufacturer and labeler throughout the rebate lifecycle. Nebraska users can generate reports summarizing billed amounts, payments received, adjustments, interest, credits, disputes, and outstanding balances by manufacturer or labeler. These real-time reports support financial reconciliation, collections management, executive oversight, and audit readiness while providing complete visibility into rebate program performance. Reports are available through the graphical user interface and may be exported in multiple formats.

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| **IVM-51** | Solution must generate a report listing the date the quarterly file was received from CMS, the date the quarterly file was processed by the vendor, the date the invoices were submitted to labelers, and the date the invoices were received by the labelers. A sample of the report must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution maintains processing history and operational status information throughout each quarterly rebate cycle. System processing records document key operational milestones associated with CMS rebate files, invoice generation, and manufacturer communications, providing Nebraska with complete visibility into quarterly processing activities. Conduent will configure operational reporting to support DHHS oversight of processing milestones and provide the requested sample report with the Technical Response.

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| **IVM-52** | Solution must generate a report listing information on all invoices and prior quarter adjustment statements sent for a specific labeler in a specific time frame (Rebate Claimed, Adjustments, Interest Accrued, Payments, Outstanding Balance), broken down by program group (fee-for-service and encounter pharmacy and professional claims). Interest must be itemized at the NDC/line level. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains complete invoice, PQAS, payment, adjustment, dispute, interest, and accounts receivable history by manufacturer, rebate quarter, and NDC. Nebraska users can generate detailed reports showing rebates claimed, prior period adjustments, accrued interest, payments received, outstanding balances, and other financial activity for a selected labeler and reporting period. Reports support reconciliation, collections management, audit activities, and financial reporting while providing complete visibility into manufacturer rebate activity.

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| **IVM-53** | Solution must generate a report listing of all drugs that were invoiced for, in a specific invoice quarter, but were not on the CMS file (rebateable). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

We validate rebate invoices using current CMS rebate reference information before invoice generation. Automated validation identifies discrepancies between Nebraska utilization data and CMS rebate reference files, allowing users to review and resolve exceptions before invoices are finalized. Conduent will configure reporting to identify rebate exceptions requiring review and support Nebraska's quality assurance and compliance activities.

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| **IVM-54** | Solution must generate a report listing of all invoices and prior quarter adjustment statements created in a specified invoice quarter. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution maintains complete invoice and prior period adjustment history and provides configurable reporting by invoice quarter, manufacturer, rebate program, and other user-defined criteria. Nebraska users can generate reports listing all invoices and PQAS transactions associated with a specified rebate quarter, supporting financial reconciliation, audit readiness, and operational oversight.

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| **IVM-55** | Solution must generate a report listing the received and/or accrued interest for a specified labeler for a user specified time frame. Interest must be itemized at the NDC/line level. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution automatically calculates and maintains interest in accordance with CMS requirements while recording both accrued and collected interest throughout the rebate lifecycle. Nebraska users can generate reports summarizing interest by manufacturer, rebate quarter, invoice, and NDC for any user-defined reporting period. These reports support collections management, financial reconciliation, and audit activities while providing complete transparency into manufacturer interest obligations.

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| **IVM-56** | Solution must generate a report listing any drug that was invoiced an amount greater than Medicaid paid + payment from other source (total Medicaid allowable). A sample of the report must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution performs automated claim validation and invoice quality assurance before rebate invoices are released. Validation processes compare utilization and rebate calculations using CMS reference information and Nebraska claims data to identify potential exceptions requiring review. Conduent will configure exception reporting to support Nebraska's financial integrity reviews and provide the requested report sample with the Technical Response.

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| **IVM-57** | Solution must generate a report to notify labelers of the status of disputes, or how a dispute was resolved. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains comprehensive dispute management records, including dispute status, supporting documentation, payment activity, adjustments, and resolution history. Integrated reporting provides complete visibility into dispute activities and supports manufacturer communications throughout the dispute lifecycle. Conduent will work with Nebraska to configure dispute status reporting that supports both internal management and manufacturer communications.

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| **IVM-58** | Solution must generate a report listing all family planning drugs invoiced, including the Medicaid + paid by other sources amount paid, and amount invoiced. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate solution maintains detailed claim, drug reference, utilization, payment, and rebate information supporting configurable operational and financial reporting. Nebraska users can generate reports using user-defined drug classifications, reporting periods, manufacturers, and other business criteria. Conduent will configure reporting during implementation to support Nebraska's family planning reporting requirements and provide the requested report format.

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| **IVM-59** | Solution must generate and maintain an electronic file and report of all paid encounter physician and pharmacy claims with disputed products (NDCs) for the rebate quarter under review to facilitate dispute research and resolution. A sample of the report must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains detailed claim, invoice, dispute, payment, and NDC-level information supporting comprehensive dispute management and reporting. Electronic files and reports can be generated to support Nebraska's review of disputed physician-administered and pharmacy claims associated with a specific rebate quarter. By maintaining complete historical claim and dispute information, Conduent enables efficient dispute research, manufacturer negotiations, financial reconciliation, and audit support while improving rebate collections and reducing administrative effort.

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| **IVM-60** | Vendor must provide DHHS with a copy of CMS pharmacy-related communications (e.g., manufacturer or labeler code changes, DESI code changes, product deletions, labeler terminations, new manufacturer or labelers). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent continuously monitors CMS pharmacy communications, manufacturer notices, rebate program updates, and other federal guidance affecting Medicaid Drug Rebate Program operations. Our Medicaid rebate specialists review CMS communications, evaluate operational impacts, and provide Nebraska DHHS with timely notification of relevant pharmacy-related changes, including manufacturer additions and terminations, labeler changes, product updates, and other CMS reference data affecting rebate processing. This proactive communication process helps Nebraska remain compliant with evolving federal requirements while minimizing operational disruption.

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| **IVM-61** | Solution must generate a report listing all instances in which a quarter-to-quarter variation equal to or exceeding a parameterized percentage occurs, in terms of either units invoiced or dollars collected for each NDC , the reason(s) for the variance (e.g. billing error, conversion issue), and convey this information to DHHS for review prior to quarterly invoicing. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution provides a report listing with configurable reporting and trend analysis that enables Nebraska to identify significant quarter-over-quarter variances in utilization, rebate amounts, collections, and other operational metrics. Automated validation and reconciliation processes identify anomalies requiring review before invoices are released. Conduent works with DHHS to establish configurable variance thresholds and reporting criteria that highlight material changes requiring investigation, supporting improved financial oversight and reducing the risk of billing errors before quarterly invoicing.

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| **IVM-62** | Solution must generate a report that demonstrates the claims information provided by DHHS is used in each quarterly invoicing cycle, and any exceptions with reasons for not including specific claims in the applicable cycle. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution maintains complete traceability between Nebraska claims data and quarterly rebate invoices. During each invoicing cycle, automated validation and reconciliation processes identify claims included in rebate processing and document claims excluded from invoicing together with the applicable business rule or validation exception. Nebraska can generate reports demonstrating the disposition of every claim submitted for rebate processing, supporting program oversight, quality assurance, audit readiness, and regulatory compliance.

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| **IVM-63** | Solution must have the capability to generate ad-hoc reports against information provided by CMS and DHHS and information (e.g. drug rebate invoicing, dispute management, and accounting processes). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution includes robust ad hoc reporting capabilities that allow authorized Nebraska users to generate reports using CMS reference data, DHHS operational data, and rebate information maintained within the system. Users may combine operational, financial, manufacturer, invoice, dispute, payment, and NDC-level information to support program management, financial analysis, audit activities, and executive reporting. Configurable reporting reduces dependence on technical staff while providing Nebraska with timely access to the information needed to effectively manage the Medicaid Drug Rebate Program.

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| **IVM-64** | Solution must allow users to run ad-hoc queries against information provided by CMS and DHHS and information generated by the vendor's proposed solution used for drug rebate invoicing, dispute management, and accounting processes. DHHS users must be able to choose from multiple pre-built defined parameters, singularly or in combination, to generate user-customized results. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution provides secure online inquiry and flexible ad hoc query capabilities through an intuitive graphical user interface. Authorized DHHS users can select from predefined search parameters and combine multiple criteria—including manufacturer, labeler, NDC, invoice quarter, rebate program, payment status, disputes, and accounts receivable information—to retrieve real-time operational and financial information. Role-based security ensures users access only authorized data while supporting efficient research, reporting, and program management.

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| **IVM-65** | Vendor must provide DHHS with a report documenting any deficiencies between the vendor's proposed solution and federal and state rebate standards. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent conducts ongoing assessments of regulatory requirements and solution capabilities throughout implementation and operations. If differences are identified between evolving federal or state rebate standards and the deployed solution, Conduent documents the deficiency, evaluates operational impacts, recommends corrective actions, and works collaboratively with Nebraska to prioritize implementation through established governance and change management processes. This transparent approach enables Nebraska to make informed decisions while maintaining regulatory compliance and minimizing operational risk.

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| **IVM-66** | Vendor must provide DHHS with white papers that provide an analysis, impact, and applicable options and recommendations for changes identified in Federal rebate standards. Vendor must notify DHHS within one (1) business day of becoming aware of a change to Federal rebate standards. The Vendor notification must include an estimate of the time necessary to provide DHHS with the white paper. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's Medicaid rebate specialists continuously monitor CMS guidance, federal legislation, regulatory updates, and industry developments affecting the Medicaid Drug Rebate Program. When significant changes occur, Conduent promptly notifies Nebraska DHHS, evaluates the operational and technical impacts, and prepares white papers that summarize the regulatory change, assess its effect on Nebraska's operations, and provide practical implementation options and recommendations. As a strategic partner, not simply a software provider, Conduent helps Nebraska anticipate regulatory changes, evaluate alternatives, and implement compliant solutions with minimal disruption.

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| **IVM-67** | Solution must allow all reports with claims information to be identified and reported based on claim type (e.g. pharmacy, professional) and procedure code (e.g. NDC, J-Code, modifiers, units). Frequency request is on request – query functionality must be real-time for data maintained within the system used for invoicing, disputes, and accounting. All reports with a standard monthly, quarterly, and annual frequency must also be available on request based on user-customized time periods. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution supports flexible reporting and online inquiry using multiple configurable data elements, including claim type, provider information, manufacturer, NDC, rebate program, invoice quarter, and other available operational attributes. Standard monthly, quarterly, and annual reports may also be generated for user-defined reporting periods, providing Nebraska with timely access to operational and financial information needed for program oversight, dispute management, and regulatory reporting. Real-time inquiry capabilities allow authorized users to retrieve current information maintained within the rebate administration system at any time.

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| **IVM-68** | Solution must accommodate leap year processing. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution uses standard enterprise date processing and supports all calendar-based processing required for Medicaid Drug Rebate Program operations, including leap year calculations. Date-dependent processing—including rebate calculations, interest calculations, invoice generation, payment tracking, and reporting—uses system-managed calendar functionality to ensure accurate processing regardless of calendar year.

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| **IVM-69** | Vendor must complete all disputes received through each quarterly invoicing cycle in entirety before the initiation of the subsequent invoicing cycle. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's experienced Medicaid rebate specialists actively manage manufacturer disputes throughout each quarterly rebate cycle using structured workflows, automated tracking, and disciplined operational procedures. To account for dispute resolution activities that are dependent upon manufacturer participation and responsiveness, add language to allow disputes to remain open provided the Vendor has made timely, documented efforts toward resolution.

Our dispute management approach emphasizes early identification, timely research, proactive manufacturer communication, and rapid resolution to minimize outstanding balances and maximize rebate collections. Working collaboratively with Nebraska DHHS, Conduent prioritizes completion of all outstanding disputes before the next quarterly invoicing cycle begins, reducing carryover issues, improving financial accuracy, and supporting timely CMS reporting.

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| **IVM-70** | The Vendor will store and report on current and historical Unit Rebate Amount (URA) information by labeler, year, and quarter. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our solution imports, validates, and maintains current and historical CMS Unit Rebate Amount (URA) information throughout the rebate lifecycle. The solution preserves URA history by manufacturer (labeler), rebate year, and quarter while maintaining complete historical records supporting rebate calculations, prior period adjustments, dispute resolution, reconciliation, and federal reporting. Authorized Nebraska users can access URA information through online inquiry and configurable reports, providing complete visibility into both current and historical rebate values while supporting audit readiness and financial accountability.

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| **IVM-71** | Solution must provide the capability to allow retrieval of the detailed drug claim listings (CLD) for IQVIA electronically using IQVIA defined format. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains detailed claim-level rebate information and supports electronic generation of claim-level data files required for rebate administration and manufacturer support. Conduent will work collaboratively with Nebraska DHHS and IQVIA to configure file layouts, transmission methods, and processing schedules that comply with IQVIA-defined specifications while ensuring accurate, secure, and timely exchange of rebate information.

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| **IVM-72** | DHHS must meet all federal reporting requirements, as well as those imposed by Nebraska regulations and policies. The MDR solution must have the flexibility to provide reporting for multiple perspectives: e.g. state staff, providers, labelers, participants, etc. Sample reports must be provided with the proposal and will be finalized after reviews with DHHS to determine what additional reporting may be required to meet DHHS needs. Reporting capabilities need to be flexible enough for printing, transfer via multiple output formats and methods, and be customizable by the end user to meet that user's individual needs.<br>*DHHS reserves the right to add additional reports, change reporting requirements and request on-demand reports as deemed necessary. All reporting must be available in a format that easily allows the data to be imported into state data warehouses and decision support systems. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution provides a comprehensive reporting framework that supports operational, financial, regulatory, and executive reporting throughout the Medicaid Drug Rebate Program. The solution includes more than 50 standard operational and financial reports, robust ad hoc reporting capabilities, and secure online inquiry that enable Nebraska users to access real-time information based on their individual business needs. Reports may be filtered by manufacturer, rebate program, invoice quarter, NDC, claim type, accounts receivable status, disputes, payments, and numerous additional data elements.

Conduent works collaboratively with Nebraska DHHS during implementation to review reporting requirements, configure report layouts, and develop additional reports as business needs evolve. Reports are available in multiple output formats and support printing, electronic distribution, and export for integration with Nebraska's enterprise data warehouse, decision support tools, and other downstream systems. This flexible reporting framework enables Nebraska to meet current CMS reporting requirements while adapting efficiently to future State and Federal reporting needs without unnecessary custom development.

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| **IVM-73** | Solution must transmit a copy of the quarterly CMS rebateable labeler file to MMIS for claims adjudication purposes. (List of Labelers) |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent supports secure interfaces between the CMdS Rebate Administration solution and external Medicaid enterprise systems. The solution imports CMS rebate reference information and supports configurable outbound interfaces that distribute approved rebate reference data to downstream systems. During implementation, Conduent will work with Nebraska DHHS to define interface specifications, transmission schedules, validation procedures, and error handling processes that support MMIS claims adjudication and enterprise integration requirements.

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| **IVM-74** | Solution must interface with CMS to send a quarterly drug rebate utilization file and receive back utilization errors file. (CMS Drug Rebate Utilization and CMS Utilization Errors) |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution supports quarterly electronic exchange of CMS-required rebate information using established federal file formats and validation processes. The solution generates quarterly utilization files, processes CMS response files, identifies utilization exceptions, and incorporates correction activities into the rebate processing workflow. Automated validation improves data quality before submission while reducing processing delays and supporting timely CMS reporting and rebate invoicing.

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| **IVM-75** | Solution must receive a list of labelers from DHHS for which claims will be included on the IQVIA paid claims file. (IQVIA Labeler List) |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's solution supports configurable interface processing that imports reference data supplied by Nebraska DHHS to support rebate operations and external reporting. Conduent will work with DHHS to define the format, transmission schedule, validation rules, and processing logic for IQVIA labeler lists, ensuring the appropriate manufacturers are included in downstream rebate processing and reporting activities. Automated validation and audit controls improve data integrity while reducing manual processing.

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| **IVM-76** | Solution must interface with Nebraska's preferred drug list vendor to supply a utilization data file for supplemental rebate purposes. (Supplemental Utilization Data file and Tag file) |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent's configurable integration framework supports secure exchange of utilization and rebate information with external Medicaid enterprise systems and third-party business partners. During implementation, Conduent will collaborate with Nebraska DHHS and the State's preferred drug list (PDL) vendor to define interface specifications, file layouts, transmission schedules, validation procedures, and security requirements for supplemental rebate utilization and tag files. The solution's configurable interface architecture simplifies integration with external systems while minimizing custom development and supporting Nebraska's supplemental rebate program objectives.

| Accounting (ACC) | |
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| **Number** | **Requirement Description** |
| **ACC-01** | Solution must capture, or convert electronically, the prior quarter adjustment statement (PQAS) and reconciliation of state invoices (ROSIs), perform line-item match by drug, link to the invoice and identify disputes when payments are received. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution electronically captures and processes both Reconciliation of State Invoices (ROSI) and Prior Quarter Adjustment Statements (PQAS) using CMS-standard formats and intuitive data entry screens. To allow sufficient time for large check allocations, (e.g., 100+ page check allocations), Conduent is seeking to extend timeframe to ten (10) business days

Upon receipt of manufacturer payments, the solution links payment information to the corresponding invoice, performs automated line-item matching at the National Drug Code (NDC) level, and identifies adjustments, disputes, and payment variances for review. As rebate allocation specialists enter PQAS information, the solution automatically matches prior-quarter adjustment amounts to CMS Prior Period Adjustment records without manual intervention, improving accuracy while reducing processing time. Throughout the allocation process, users can record disputed units, unit adjustments, and Unit Rebate Amount (URA) corrections while preserving the original invoice history for complete auditability. The solution verifies payment allocation from initial receipt through posting at the NDC level, providing Nebraska with a fully traceable, efficient, and accurate reconciliation process.

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| **ACC-02** | Solution must maintain NDC level information on the drug rebate accounts receivable. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains complete accounts receivable information at the 11-digit NDC level throughout the rebate lifecycle. The solution records invoice amounts, payments received, disputed units, unit adjustments, URA changes, outstanding balances, interest due and paid, and payment history while maintaining real-time accounts receivable balances. As payments are allocated, disputes resolved, or adjustments processed, the system immediately updates NDC-level balances, ensuring Nebraska staff always have current financial information available. This detailed accounting provides complete visibility into rebate activity while supporting accurate collections, financial reconciliation, audit readiness, and reporting.

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| **ACC-03** | Solution must provide multiple methodologies (e.g., percentage and actual), for allocation of the drug rebates to program funding source(s) and identify drug rebate amounts by benefit program. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

CMdS supports both percentage-based and actual allocation methodologies and can apply State-defined allocation rules by funding source and benefit program. Our solution supports flexible allocation methodologies that enable Nebraska to allocate rebate collections according to State-defined funding rules and benefit programs. The solution separately administers Federal, supplemental, and state-only rebate programs while maintaining independent accounting and payment allocation for each program. Comprehensive accounts receivable and reporting capabilities provide visibility into rebate amounts by program, manufacturer, invoice, and NDC, allowing Nebraska to accurately allocate rebate revenue, reconcile payments, and support financial reporting requirements. Because the solution is highly configurable, allocation methodologies can be adapted to Nebraska's funding structure without extensive customization.

Conduent has requested an exception regarding the following requirement:

**RFP language:** Capture, or convert electronically, the prior quarter adjustment statement (PQAS) and reconciliation of state invoices (ROSIs) within three (3) business days of when payments are received.

**The basis for exception is as follows:** To allow sufficient time for large check allocations, (e.g., 100+ page check allocations), seeking to extend timeframe to ten (10) business days.

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| **ACC-04** | Solution must produce accounting reports (configured for a specific time of inactivity for inactive labelers who have not paid a payment for a period of time) for outstanding drug rebate debt including interest calculated based on CMS rules. Interest must be itemized at the NDC/line level (Doubtful Account Report). Monthly or within one (1) business day of request. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent provides comprehensive accounting and accounts receivable reporting that enables Nebraska to monitor outstanding rebate debt, inactive labelers, payment history, disputes, and accrued interest. Reports are configured for a specific time of inactivity for inactive labelers who have not paid a payment for a period of time. Users can generate reports on demand through the system's graphical user interface, with results available online for review, printing, or export. The solution maintains current accounts receivable balances in real time and supports reporting of outstanding balances by manufacturer, program, and NDC. Interest is calculated in accordance with CMS requirements using the applicable 13-week Treasury Bill rates and can be reported at the NDC level to support dispute resolution, collection activities, and financial oversight. Conduent also develops additional reports as needed to support State business requirements and CMS reporting obligations. All reports are submitted monthly or within one business day of request.

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| **ACC-05** | Solution must provide real-time online query and retrieval of interest rates, calculation, accumulation, invoicing, and reporting of interest amounts on outstanding balances related to the drug rebate program. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS solution provides real-time online access to interest calculations, accounts receivable balances, payment history, and outstanding rebate obligations. The solution calculates interest in accordance with CMS requirements using current 13-week Treasury Bill investment rates, the invoice postmark date, and the payment postmark or electronic funds transfer date. Interest amounts accumulate automatically as outstanding balances remain unpaid and are immediately reflected in accounts receivable balances and reporting. The solution supports flexible invoicing options that display total interest due as well as detailed interest by quarter and NDC, giving Nebraska complete visibility into outstanding obligations and supporting efficient collections and dispute resolution. Automated calculations, quality monitoring, and configurable reporting ensure accurate, transparent, and timely interest management throughout the rebate lifecycle.

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| **ACC-06** | Solution must systematically establish Accounts Receivables at the Manufacturer or Labeler level for drug manufacturers invoiced for each drug rebate invoice generated by the system. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate solution automatically establishes and maintains Accounts Receivable (AR) records at the manufacturer (labeler) level each time a rebate invoice is generated. As invoices are created, the solution immediately posts the receivable to the AR ledger and maintains current balances throughout the rebate lifecycle. The system retains complete invoice, payment, adjustment, dispute, and interest information, allowing Nebraska users to monitor manufacturer balances in real time. Users can view AR information by manufacturer, quarter, program, NDC, or claim level through an intuitive graphical interface, providing complete visibility into outstanding balances and collection activities while eliminating manual accounting processes.

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| **ACC-07** | Solution must provide quarterly drug rebate reconciliation according to DHHS defined criteria. The solution will write a quarterly report at the end of each invoicing cycle comparing both FFS and MCO encounter claims that were received from DHHS input source(s) for invoicing. It will use the DHHS-defined business rules for which claims meet criteria for invoicing. The solution will identify claims which were flagged as meeting criteria for invoicing but not included in the rebating process and include identified claims which were flagged as not meeting criteria for invoicing but should have been invoiced. The report will be available to DHHS within thirty (30) calendar days after the end of each invoicing quarter. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution performs comprehensive quarterly reconciliation using configurable business rules established by Nebraska DHHS. The solution imports fee-for-service (FFS) and managed care encounter claims, validates rebate eligibility, performs automated claim and invoice audits, and compares invoiced claims against source claim data to identify exceptions. Claims meeting rebate criteria but not invoiced, as well as claims invoiced in error, are identified through reconciliation reports that support timely review and correction. More than 50 standard reports, combined with configurable reporting capabilities, provide Nebraska with detailed reconciliation results by program, quarter, manufacturer, NDC, and claim. These reports support quality assurance, improve invoice accuracy, reduce manufacturer disputes, and are available within the timelines established by DHHS.

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| **ACC-08** | Solution must provide reconciliation between the drug rebates received and the amount reported on the CMS-64.9R form for the quarter. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The Conduent's solution automatically generates the CMS-64.9R report at the end of each quarterly invoicing cycle and supports reconciliation between rebate collections and the amounts reported to CMS. The solution captures rebate invoicing, collections, utilization, Unit Rebate Amount (URA) adjustments, and other financial transactions required for CMS reporting while maintaining complete accounts receivable records. Nebraska may generate CMS-64.9R reports by individual rebate program or combine multiple programs into a consolidated report. Reports are available online and may be exported in PDF, Excel, or text formats, providing complete transparency into quarterly financial activity and supporting accurate federal financial reporting.

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| **ACC-09** | Solution must compare invoices to payment documentation returned by the manufacturer to determine which NDC line items are paid or in dispute. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate solution compares manufacturer payment documentation, including ROSI and PQAS submissions, to the original rebate invoice at the 11-digit NDC level. Upon receipt of payment, Conduent rebate specialists allocate payments to the applicable invoice and record principal, interest, disputed units, URA adjustments, and payment variances for each affected NDC. The solution maintains separate records for paid and disputed amounts while preserving complete payment history and supporting documentation. This automated reconciliation process provides Nebraska with immediate visibility into paid, unpaid, adjusted, and disputed line items, accelerating dispute resolution while improving collection accuracy.

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| **ACC-10** | Solution must provide automated and, on an exception basis, manual processes to reconcile amounts paid to amounts invoiced by NDC line item. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The Conduent solution combines automated payment reconciliation with user-assisted exception processing to ensure accurate reconciliation of manufacturer payments at the NDC line-item level. The system automatically matches payments to invoices, updates accounts receivable balances, and identifies discrepancies requiring review. When exceptions occur, authorized rebate specialists can review ROSI and PQAS information, enter manufacturer-supplied URAs, record disputed or adjusted units, and complete payment allocations while maintaining full audit history. Accounts receivable balances update immediately following payment allocation, providing Nebraska with real-time financial information and complete visibility into outstanding balances, disputes, and payment activity. This integrated approach minimizes manual effort while ensuring accurate financial management and efficient rebate operations.

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| **ACC-11** | Solution must maintain, display, and report an audit trail of all changes made to invoices and identify invoice records that have been changed to facilitate future processing. The audit trail must minimally include invoice details before and after the change, date of change, reason for change, and source of change. The audit trail must be accessible to DHHS staff online and in a report format. |
| | Met the requirement: YES<br><br>Implementation Approach: Customization |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Solution maintains a comprehensive audit trail for all invoice activity, providing Nebraska with complete visibility into every change made throughout the rebate lifecycle. The system preserves original invoice values as well as all subsequent modifications, including payment status, collections, non-payments, non-responders, disputed units, Unit Rebate Amount (URA) changes, adjustments, and other invoice updates. Audit records capture the before-and-after values, date and time of the change, source of the change, and supporting transaction history, ensuring complete traceability and accountability. Authorized DHHS users can access audit information online through the system and generate reports to support operational management, financial reconciliation, compliance activities, and audits. By maintaining a permanent history of invoice activity, Conduent simplifies future processing while strengthening program integrity and audit readiness.

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| **ACC-12** | Solution must record all receipts of rebate payments, made to DHHS, distinguishing between federal and state business units and between rebates for FFS and managed care claims (pharmacy and professional) and apply to correct invoice (e.g., appropriate calendar quarter, invoice and manufacturer or labeler, program, NDC). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution records every rebate payment received and automatically applies payments to the appropriate invoice, manufacturer, calendar quarter, rebate program, and NDC. Receipts are distinguished between federal and state business units and FFS vs Managed Care claims (pharmacy and professional). The solution maintains detailed accounting records for principal, interest, adjustments, disputes, and outstanding balances while supporting separate accounting for Federal, supplemental, and state rebate programs. Flexible reporting allows Nebraska to distinguish rebate activity by program, manufacturer, labeler, NDC, and other business dimensions needed for financial management and federal reporting. Real-time accounts receivable updates ensure payment information is immediately available for reconciliation, reporting, and operational oversight.

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| **ACC-13** | Solution must maintain a process to track drug rebate activities (invoicing, adjustments, payments, credits, disputes, sending of letters and requests of information from labelers) by NDC and manufacturer. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution provides complete lifecycle tracking of rebate activity at both the manufacturer and 11-digit NDC levels. The system maintains detailed records of invoices, payments, credits, adjustments, disputes, interest, outstanding balances, and manufacturer communications while preserving complete transaction history throughout the rebate process. Rebate specialists use integrated workflows to manage manufacturer correspondence, resolve disputes, process adjustments, and monitor collection activities from a single application. Nebraska users can quickly access current and historical rebate information, improving operational efficiency, reducing manufacturer disputes, and providing complete visibility into rebate operations.

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| **ACC-14** | The solution must be able to accurately report deposit data in correct categories for deposit and federal reporting using underlying paid claims data for which drug rebate payments are received. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder’s approach/ability to meet the requirement] |

The CMdS Rebate Administration solution maintains complete financial accountability by linking rebate collections directly to the underlying paid claims and associated accounts receivable records. Using this information, the solution produces accurate financial reports supporting deposits, rebate accounting, and CMS reporting requirements. More than 50 standard reports provide detailed views of invoice amounts, payments received, principal, interest, outstanding balances, disputes, and reference data by program, manufacturer, labeler, and NDC. Reports are available online in real time and may be exported in multiple formats to support Nebraska's financial reconciliation, federal reporting, and downstream accounting processes. This integrated approach improves financial accuracy while reducing manual reconciliation and reporting effort.

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| **ACC-15** | Solution must have the ability to generate an on-demand report summarizing the rebates invoiced for a given therapeutic drug class and date range as defined by DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder’s approach/ability to meet the requirement] |

Conduent meets this requirement. The CMdS Rebate Administration solution includes more than 50 standard reports and robust ad hoc reporting capabilities that allow Nebraska users to generate on-demand reports using user-defined selection criteria. Reports can be filtered by date range, manufacturer, labeler, NDC, rebate program, and other available data elements to provide meaningful operational and financial analysis. The solution also incorporates First Databank reference information, including drug classification data, enabling Nebraska to summarize rebate activity by therapeutic drug class as defined by DHHS. Reports execute quickly through the system's graphical user interface and are available immediately for online review or export in multiple formats, providing Nebraska with timely information to support program oversight, financial analysis, and policy decisions. Conduent will also develop additional reports, as needed, to meet Nebraska's evolving business and CMS reporting requirements.

| Customer Support, Documentation, and Training (CDT) | |
|---|---|
| **Number** | **Requirement Description** |
| **CDT-01** | Vendor must provide technical assistance to all entities included in the drug rebate process, including CMS, DHHS, Labelers, and other Vendors. Vendor must provide acknowledgement of the request to the requestor within one (1) business day. The Vendor's acknowledgement must include an estimate of the time necessary to provide the requested technical assistance. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent provides coordinated technical assistance to all entities participating in the Medicaid Drug Rebate Program, including CMS, DHHS, labelers, trading partners, and other authorized vendors. Conduent's rebate operations and technical support teams serve as a single point of contact for inquiries, issue resolution, system support, data exchanges, reporting questions, and operational guidance.

Upon receipt of a technical assistance request, Conduent logs, tracks, and assigns the request to the appropriate subject matter expert. Conduent will provide a formal acknowledgment within one (1) business day that includes an estimated timeframe for providing the requested technical assistance.

- A unique ticket or tracking number
- A summary of the request
- The assigned support resource or team, as applicable
- The priority/severity level
- An estimated timeframe for response and resolution based on the nature and complexity of the request

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| **CDT-02** | Vendor must provide DHHS with support, including Vendor staff participation in meetings, and documentation if a drug manufacturer dispute, or other rebate-related action, proceeds to an administrative or judicial review. Vendor must provide acknowledgement of the request to the requestor within one (1) business day. The Vendor's acknowledgement must include an estimate of the time necessary to provide the requested support or documentation. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Implementation Approach

Conduent provides DHHS with comprehensive operational, technical, and subject matter expert support when a drug manufacturer dispute or other rebate-related action advances to an administrative or judicial review.

For each request for support or documentation related to a manufacturer dispute or rebate-related action, Conduent will acknowledge the request within one (1) business day and provide an estimate of the time necessary to provide the requested support or documentation. The acknowledgment includes:

- Request confirmation and tracking identifier
- Summary of the requested support or documentation
- Assigned Conduent point of contact
- Estimated timeframe for delivery of the requested support, analysis, or documentation
- Identification of any dependencies or information needed from DHHS

## Support Activities

When a dispute proceeds beyond routine resolution activities, Conduent provides:

- Participation in strategy, preparation, and status meetings with DHHS
- Research and analysis of utilization, invoicing, rebate, dispute, and adjustment data
- Historical transaction and audit trail documentation
- Manufacturer correspondence and dispute history
- System-generated reports and supporting evidence
- Rebate policy, operational, and technical subject matter expertise
- Preparation of exhibits, summaries, timelines, and reconciliation documentation
- Conduent staff will participate in administrative hearings, appeals, judicial review proceedings, and related preparation meetings as requested by DHHS

## Tools and Methods

Conduent uses proven rebate operations processes and the CMdS Rebate Administration solution to support dispute research and documentation activities. The solution maintains historical invoicing, dispute, utilization, and adjustment information in a centralized repository, enabling staff to quickly retrieve supporting records, audit trails, correspondence, and reporting needed for review activities.

## Assumptions

Conduent assumes DHHS will provide timely access to records, correspondence, legal requests, and other supporting materials not maintained within the MDR solution. We also assume that all administrative and judicial review activities will be conducted in accordance with applicable State and Federal confidentiality, privacy, and data-sharing requirements. In addition, DHHS will identify required participants, key stakeholders, and document submission deadlines to support effective coordination, scheduling, and delivery of requested support and documentation.

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| **CDT-03** | Vendor must coordinate with appropriate CMS staff and, as necessary, appropriate contacts for pharmaceutical manufacturers when the Vendor determines that necessary CMS information pertaining to any given manufacturer's rebate-qualified drug is incomplete or otherwise inaccurate. Vendor must provide acknowledgement of the request to the requestor within one (1) business day. The Vendor's acknowledgement must include an estimate of the time necessary to provide the requested support, coordination, or response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent actively monitors CMS rebate data, drug file information, manufacturer records, and rebate processing activities to identify missing, inconsistent, or inaccurate information. This review helps identify issues that could affect rebate invoicing, collections, disputes, or program compliance. When we determine that CMS information associated with a manufacturer's rebate-qualified drug is incomplete, missing, or inaccurate, we will coordinate directly with the appropriate CMS staff and, as necessary, the manufacturer's designated contacts to obtain clarification, validate information, and resolve the discrepancy.

Upon receiving or initiating a request for support, coordination, or response, we acknowledge the request within one (1) business day. The acknowledgment includes:

- Request confirmation and tracking number
- Summary of the identified issue or information gap
- Assigned Conduent point of contact
- Required stakeholders, if known

- Estimated timeframe to provide support, coordination activities, findings, or a formal response
- Any known dependencies that may affect resolution timelines

## Coordination Process

When incomplete or inaccurate CMS information is identified, Conduent:

- Reviews and validates the discrepancy using available rebate, utilization, and drug reference data
- Documents the issue, affected drug(s), manufacturer information, and potential business impact
- Contacts appropriate CMS representatives to obtain clarification, correction, or supplemental information
- Coordinates directly with pharmaceutical manufacturer contacts when manufacturer validation or supporting documentation is required
- Tracks all communications, research activities, and resolutions within established operational workflows
- Provides DHHS with status updates, findings, recommended actions, and final resolution details

## Tools and Methods

Conduent utilizes the CMdS Rebate Administration solution, established rebate operations procedures, audit trails, reporting tools, and automated validation processes to identify, research, and resolve data discrepancies. Our centralized platform provides access to historical rebate activity, utilization records, invoice data, dispute history, and manufacturer communications, allowing our analysts to conduct efficient research and support timely issue resolution. The solution's reporting and tracking capabilities provide transparency throughout the coordination process.

## Assumptions

Conduent assumes CMS and pharmaceutical manufacturers will provide requested information, clarifications, or supporting documentation within timeframes consistent with their established business and regulatory processes. We also assume DHHS will provide access to any State-specific information required to support research activities and decision-making. Resolution timelines may vary based on the complexity of the issue, responsiveness of external stakeholders, and the availability of supporting documentation.

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| **CDT-04** | Vendor must support communication with other Vendors or parties, regarding the inclusion of applicable claims for rebates invoicing purposes, both state and federal. Vendor must provide acknowledgement of the request to the requestor within one (1) business day. The Vendor's acknowledgement must include an estimate of the time necessary to provide the requested support, coordination, or response. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

When requested by DHHS, Conduent will support communication with other vendors and authorized parties regarding the identification, validation, reconciliation, and inclusion of applicable claims for both State and Federal rebate invoicing purposes.

Upon receipt of a request for support, coordination, or information, Conduent will acknowledge the request within one (1) business day. The acknowledgment includes:

- Request confirmation and tracking identifier.
- Summary of the issue or requested support.
- Assigned Conduent point of contact.
- Estimated timeframe to provide the requested support, coordination activities, or response.
- Identification of any known dependencies or information required from participating parties.

## Communication and Coordination Process

To support the inclusion of rebate-eligible claims, Conduent:

- Reviews claim, drug, utilization, and invoicing data to identify discrepancies, omissions, or eligibility concerns.
- Coordinates with appropriate vendors or third parties to gather, validate, and reconcile required information.
- Facilitates stakeholder discussions to resolve data quality, eligibility, or processing issues.
- Documents communications, research activities, findings, and resolutions.
- Provides status updates and recommendations to DHHS throughout the process.
- Incorporates validated claims into rebate invoicing activities in accordance with CMS and program requirements.

## Tools and Methods

Conduent utilizes the CMdS Rebate Administration solution, automated validation controls, reporting tools, audit trails, and established rebate operations procedures to support claim validation and reconciliation activities. These tools allow our team to analyze claim and utilization data, identify exceptions, track resolution activities, and maintain a complete history of stakeholder communications.

## Assumptions

Conduent assumes participating vendors and authorized third parties will provide requested claim, utilization, and supporting data within established operational timeframes. We also assume DHHS will facilitate access to stakeholders when State involvement is required to resolve complex issues or data discrepancies.

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| **CDT-05** | Vendor must provide DHHS, Vendor staff, and impacted stakeholders (e.g. manufacturers, pharmacies, etc.) training on the Vendor's proposed solution that includes the Vendor's applications and operational process. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide role-based training for DHHS staff, Conduent personnel, manufacturers, pharmacies, and other authorized stakeholders who interact with the CMdS Rebate Administration solution. Training will address system functionality, business processes, and operational procedures necessary to support Medicaid Drug Rebate Program administration.

Working with DHHS, Conduent will identify stakeholder groups, define learning objectives, and develop training curricula aligned with participant responsibilities. Training topics include system navigation, rebate invoicing, dispute management, reporting, file exchanges, security administration, workflow processing, and operational support procedures.

Training materials will include user guides, administrator guides, standard operating procedures, job aids, quick reference materials, process workflows, and recorded training content. All materials will be maintained under version control and updated to reflect approved system or business process changes.

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| **CDT-06** | Vendor must provide a draft Training Plan with the proposal. A sample of the Training Plan must be submitted with the Technical Response. A final detailed Training Plan must be developed, reviewed and approved by DHHS within 45 calendar days of the contract start date. The approved Training Plan must minimally address the following topics for training activities:<br>a. Approach and scope (including all audience groups).<br>b. Training activity, schedule, duration, types (i.e., in person, online, pre-recorded, real time, interactive, etc.), locations, for various stakeholder groups (e.g. state staff, labelers, etc.) by task.<br>c. Assurances for providing timely, appropriate training activities for all stakeholders.<br>d. Roles and responsibilities for all stakeholder types.<br>e. Training to support the initial implementation of solution.<br>f. Post implementation training activities and frequency throughout the life of the contract.<br>g. Languages that training will be provided in and basis for verifying accuracy of all translations; and<br>h. Identification of standardized and ad hoc training materials. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent has included a sample Training Plan and will finalize the DHHS-approved Training Plan within 45 calendar days of contract start.

Using our structured **ADDIE (Analyze, Design, Develop, Implement, Evaluate)** methodology, Conduent works with DHHS to identify stakeholder groups, assess training needs, define learning objectives, develop curricula, establish training schedules, and measure training effectiveness.

## a. Training Approach and Scope

The Training Plan defines a comprehensive training strategy that addresses the needs of all stakeholder groups interacting with the MDR solution, including:

- DHHS business users
- Program administrators
- System administrators
- Technical and operational support staff
- Conduent operational staff
- Pharmaceutical manufacturers (labelers)
- Trading partners and authorized third parties
- Other stakeholders identified by DHHS

For each audience, the Training Plan identifies learning objectives, required competencies, training delivery methods, and knowledge transfer activities.

## b. Training Activities, Schedule, Delivery Methods, and Locations

A sample of the Training Plan is included with this response in Section VI.A.2.II.c.2 Customer Support, Documentation, and Training (CDT) Report Samples. The Training Plan includes a detailed training matrix identifying:

- Training topics and objectives
- Target audiences
- Training format and delivery method
- Duration and frequency
- Delivery location
- Required prerequisites
- Training materials

Delivery methods include:

- Instructor-Led Training (ILT)
- Virtual Instructor-Led Training (vILT)
- Self-paced eLearning modules
- Interactive workshops
- Hands-on system exercises
- Knowledge transfer sessions
- Recorded training sessions
- Refresher training courses

## c. Timely Training Delivery for All Stakeholders

Conduent integrates training activities into the Master Project Plan and develops stakeholder-specific schedules to support implementation readiness and business continuity. Through our Learning Management System (LMS), participant registration, attendance tracking, course completion monitoring, and training communications are centrally managed.

## d. Roles and Responsibilities

The Training Plan clearly defines responsibilities for:

- **Conduent Training Team.** Curriculum development, training delivery, material development, attendance tracking, assessments, and reporting
- **DHHS Leadership.** Training oversight, participant identification, scheduling coordination, and approval activities
- **DHHS Participants.** Training attendance, participation, assessments, and feedback
- **System Administrators.** Completion of administrator and technical training activities
- **External Stakeholders.** Participation in stakeholder-specific training related to business processes and solution interaction

## e. Initial Implementation Training

Conduent provides implementation training prior to production deployment. Training includes:

- System navigation
- User workflows
- Invoicing processes
- Rebate management activities
- Reporting and analytics
- Security and user administration
- Data management
- Operational support procedures
- Vendor support processes

## f. Post-Implementation Training

Following implementation, Conduent provides ongoing training activities that include:

- New user onboarding
- Refresher training
- Release and enhancement training
- Administrator training updates
- Role-transition training
- Knowledge transfer sessions
- Remediation training when needed

## g. Training Languages and Translation Validation

Training materials are developed in English as the standard contract language. If DHHS requires additional language support, Conduent will provide translated materials using qualified translation resources and established quality review procedures. Translation validation includes linguistic review, subject matter expert verification, and quality assurance reviews to confirm consistency between translated content and source materials.

## h. Standardized and Ad Hoc Training Materials

Conduent will maintain a library of standardized and role-based training materials, including user guides, administrator manuals, job aids, FAQs, process documentation, eLearning content, recorded sessions, and release-specific training materials. As business requirements, policies, or system functionality change, Conduent will develop and distribute ad hoc training materials to address new operational needs. All materials will be maintained under version control and made available through a centralized repository.

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| **CDT-07** | Vendor must collaborate with DHHS to finalize a training schedule that will be approved by DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will collaborate with DHHS to develop, review, and finalize a comprehensive training schedule aligned with implementation milestones, operational requirements, and stakeholder availability. The schedule will identify training audiences, delivery methods, course offerings, dates, locations or virtual delivery details, prerequisites, and completion requirements. Conduent will present the draft schedule for DHHS review, incorporate feedback, and obtain DHHS approval prior to training delivery. Throughout implementation, Conduent will update the training schedule as needed to reflect approved project changes and communicate revisions through established project governance processes.

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| **CDT-08** | Vendor must provide for development and implementation of technical and user training programs. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will develop and implement role-based technical and user training programs for DHHS personnel and authorized stakeholders. Training will address system functionality, business processes, system administration, reporting, security, and operational support activities. Training may be delivered through instructor-led, virtual instructor-led, self-paced, and hands-on formats. Training materials will be maintained under version control and updated as system functionality or business processes change. Training delivery and content will be governed by the DHHS-approved Training Plan.

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| **CDT-09** | Vendor must provide Training Plan updates on the following basis:<br>a. Prior to the scheduled pre-solution Implementation training.<br>b. Each time a solution change or upgrade is implemented. The updated and DHHS approved plan must be distributed to solution users prior to the implementation of the system change or upgrade; and<br>c. A complete review and update must be performed on an annual basis within thirty (30) calendar days of the start of each contract year. The annually updated, DHHS-approved plan must be distributed or made available to all solution users. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will maintain and update the Training Plan throughout the contract term. Prior to implementation training, the Training Plan will be reviewed and updated to reflect approved configurations, business processes, and training schedules. Following solution changes or upgrades, Conduent will update the Training Plan, obtain DHHS approval, and distribute the revised plan to affected users prior to implementation. Annually, within thirty (30) calendar days of the start of each contract year, Conduent will conduct a comprehensive review, update the plan as needed, obtain DHHS approval, and distribute or make the updated plan available to all users.

| | |
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| **CDT-10** | Vendor must perform updates to standardized training and communication materials. Updated materials must be reviewed and approved by DHHS on the following basis:<br>a. At a minimum, on an annual basis in accordance with the training schedule,<br>b. A minimum of fourteen (14) calendar days prior to a scheduled training event; and<br>c. All updates must include a version identifier and date updated notation. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will update, submit for DHHS approval, and distribute standardized training and communication materials at least annually, no less than fourteen (14) calendar days before scheduled training events, and whenever approved system, policy, or business process changes affect training content. All updated materials will contain a version identifier and revision date.

## Standardized Material Maintenance

Conduent will establish and maintain a repository of approved training and communication materials, including:

- Training Plans
- Training materials and participant guides
- Job aids and Frequently Asked Questions (FAQs)
- User and technical documentation
- Stakeholder and release communications

Training and communication materials will be reviewed regularly and updated to reflect approved system enhancements, policy changes, business process modifications, user feedback, and operational requirements.

## Version Control and Document Governance

Conduent will apply formal version-control procedures to all training and communication materials.

Each document update will include:

- Unique version identifier
- Revision date
- Document owner
- Summary of changes
- Approval status and approval date

Only the current, DHHS-approved version of a document will be distributed to users.

Conduent will distribute approved updates through the LMS, SharePoint repository, email notifications, or other DHHS-approved communication channels.

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| **CDT-11** | Vendor must provide training to all users of the solution prior to the implementation and on an ongoing basis during operations in accordance with the DHHS-approved Training Plan and Materials. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide training to all identified users prior to implementation and throughout ongoing operations in accordance with the DHHS-approved Training Plan and training materials. Pre-implementation training will prepare users to perform their assigned responsibilities before go-live through role-based instruction, hands-on exercises, and approved training materials. Following implementation, Conduent will provide ongoing training for new users, refresher training, release-specific training, and training related to business process or system changes.

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| **CDT-12** | Vendor must provide train-the-trainer sessions for DHHS resources or designated DHHS resources and other staff responsible for training. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide train-the-trainer sessions for DHHS-designated trainers and staff responsible for training. Sessions will include system functionality, business processes, training materials, instructional techniques, hands-on exercises, and knowledge validation activities. Conduent will provide updated trainer materials and supplemental training as needed to support ongoing operations and future training activities.

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| **CDT-13** | Vendor must develop and deliver training in a format and modality as agreed upon with DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will develop and deliver training in formats and modalities approved by DHHS. Delivery methods may include instructor-led training, virtual instructor-led training, self-paced learning, webinars, workshops, recorded sessions, and hands-on exercises. Training formats, schedules, and delivery approaches will be documented in the DHHS-approved Training Plan.

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| **CDT-14** | Vendor must utilize a variety of delivery methods for training, including online self-paced training presentations, written materials, webinars, demonstrations and at the discretion of DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will utilize multiple training delivery methods, including online self-paced training, written materials, webinars, demonstrations, instructor-led training, virtual instructor-led training, and other methods approved by DHHS.

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| **CDT-15** | Vendor's training materials must be offered in accessible formats consistent with requirements of the Americans with Disabilities Act. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will develop, maintain, and deliver training materials in accessible formats that support equitable access for all learners and align with ADA accessibility requirements and applicable accessibility standards identified by DHHS. Accessibility considerations are integrated throughout the training content lifecycle, from instructional design and content development to delivery, maintenance, and ongoing updates.

Conduent develops training materials in accordance with ADA accessibility requirements and applicable accessibility standards, including WCAG 2.1 Level AA and Section 508 requirements, when applicable to DHHS.

## Accessible Training Delivery

Conduent will work with DHHS to support accessible participation across all approved training delivery methods.

Depending on the selected modality, training delivery may include:

- Caption-enabled virtual training sessions
- Accessible electronic training materials distributed in advance
- Recorded sessions with captions and transcripts, when applicable
- Screen-reader compatible content
- Multiple content formats to support diverse learning needs
- Accommodation of approved accessibility requests identified by DHHS

Accessibility considerations will be incorporated into instructor-led, virtual, webinar-based, and self-paced learning experiences.

## Accessibility Review and Quality Validation

Prior to publication or distribution, Conduent will conduct accessibility reviews of training materials as part of our standard quality assurance process.

Review activities include:

- Verification of accessibility features and document structure
- Testing of electronic documents for accessibility compliance
- Validation of alternative text and navigation functionality
- Review of multimedia accessibility features, including captions
- Confirmation that updates and revisions maintain accessibility requirements

Accessibility reviews will occur during initial development and whenever training materials are revised.

| | |
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| **CDT-16** | Vendor must provide a training environment that is available to DHHS and must maintain and update the training environment with training data to use during user training. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide DHHS with a dedicated training environment that is separate from production. Conduent will maintain and update the environment and associated training data throughout the contract term to support implementation, onboarding, refresher training, and system enhancement activities. The training environment will remain available to authorized DHHS users throughout the contract term, subject to scheduled maintenance.

## Training Data Management

To support realistic learning experiences, Conduent will populate and maintain training data representative of DHHS business operations.

Conduent will maintain representative training data, role-based training scenarios, and training exercises that reflect approved business processes and system functionality. Training data will be refreshed as needed to support scheduled training activities.

## Environment Maintenance and Updates

Conduent will maintain the training environment throughout the contract lifecycle and align it with approved solution releases.

Maintenance activities include:

- Applying approved configuration updates
- Updating workflows and business rules used for training
- Synchronizing training functionality with production releases, as appropriate
- Validating training scenarios following system changes
- Updating training datasets and exercises to reflect new functionality
- Monitoring environment availability and performance during scheduled training activities

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| **CDT-17** | Vendor must make training records available to be included in the data available for reporting. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will make training records available for inclusion in DHHS reporting capabilities, dashboards, and data extracts. Training records collected through the Proponisi Learning Management System (LMS) and approved training administration tools will be available for operational, compliance, audit, and management reporting.

Training records maintained by Conduent include:

- Course enrollment and attendance
- Training completion status and completion dates
- Assessment and evaluation results
- Training modality and course information
- Learner training history and participation records

Authorized DHHS users will have access to training data through standard reports, dashboards, and approved data exports. Training records can be incorporated into workforce readiness, compliance, completion, and training performance reporting.

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| **CDT-18** | Solution must have system and user documentation to allow for efficient maintenance and operational use of the Vendor's solution. The draft version of system and user documentation must:<br>a. Be submitted within ninety (90) calendar days of the Go Live date.<br>b. Be reviewed and approved by DHHS within timeframes agreed in approved work plan.<br>c. Address the remaining documentation requirements within this section. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will develop, maintain, and deliver comprehensive system and user documentation that enables DHHS personnel to effectively operate, administer, support, and maintain the solution throughout its lifecycle.

Conduent will submit draft system and user documentation within ninety (90) calendar days of Go-Live, facilitate DHHS review and approval activities according to the approved work plan, and update documentation as needed to reflect approved comments, system changes, and operational requirements.

## System Documentation

Conduent will develop technical documentation to support efficient solution administration, maintenance, troubleshooting, and operational support.

System documentation may include:

- System architecture diagrams
- Infrastructure and environment documentation
- Interface and integration specifications
- Data flow diagrams
- Security and access control documentation
- Configuration and parameter settings
- Operational procedures
- Batch processing documentation
- Monitoring and alert procedures
- Backup and recovery procedures
- Troubleshooting guides
- Release and deployment procedures

This documentation enables DHHS technical staff to understand, support, and maintain the solution.

## User Documentation

Conduent will develop user-focused documentation that supports daily system operations and business processes.

User documentation may include:

- User guides
- Quick reference guides
- Standard operating procedures
- Job aids
- Frequently Asked Questions (FAQs)
- Process workflows
- Role-based instructions
- Training materials and reference resources

User documentation will use clear language, screenshots, step-by-step instructions, and business-relevant examples to support efficient use of the solution.

## Draft Documentation Delivery

Within ninety (90) calendar days of Go-Live, Conduent will deliver draft system and user documentation for DHHS review and approval in accordance with the approved work plan. Documentation will reflect the implemented solution, approved configurations, finalized business processes, and all documentation requirements identified within this solicitation.

## Document Governance and Version Control

Conduent will maintain all system and user documentation within a centralized document repository using formal document governance practices.

Each document will include:

- Unique document identifier
- Version number
- Revision date
- Document owner
- Approval status
- Revision history

Only approved versions will be published for operational use, while prior versions will be archived to support audit and historical reference needs.

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| **CDT-19** | Solution documentation must include a detailed, comprehensive data element dictionary (DED), including, at a minimum:<br>a. Data element names, numbers, descriptions, and definitions (including length and type).<br>b. Valid values with definitions; sources for all identified data elements.<br>c. Field calculations.<br>d. Table listings for all table(s) elements.<br>e. Lists from the DED in multiple sort formats (e.g., data element name, data element number).<br>f. Align with industry standards for definition and use as applicable. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide a detailed data element dictionary (DED) supporting operation and use of the solution, including data element definitions, valid values, sources, and related documentation. Proprietary Conduent intellectual property will be maintained in escrow under a mutually agreed escrow agreement. Escrow materials will be released only upon specified release events defined in the escrow agreement and not for routine operational, transition, or procurement activities. The DED will be developed during implementation and maintained throughout the contract term through Conduent's established data governance, configuration management, and change control processes. Updates resulting from system enhancements, CMS regulatory changes, interface modifications, reporting enhancements, data conversions, or operational process changes will be incorporated into the DED and made available to DHHS through the secure documentation repository.

## Data Element Dictionary Content

For each data element, the DED will include:

- Data Element Name
- Data Element Number or Unique Identifier
- Business Description
- Business Definition
- Technical Definition
- Data Type (character, numeric, date, currency, etc.)
- Data Length and Precision
- Required/Optional Indicator
- Business Rules
- Validation Rules
- Edit Criteria
- Calculation Logic and Formulas
- Data Transformation Rules
- Relationship to Other Data Elements
- Security Classification
- Audit Requirements

- Valid Values and Enumerated Codes
- Default Values
- Source System
- Source File and Field Name
- Destination Table and Column Name
- Reporting Usage
- Interface Usage
- CMS Reference Source Alignment
- Industry Standard References, where applicable

The DED will include operational, financial, reference, utilization, dispute, invoicing, payment, manufacturer, labeler, provider, drug, and reporting-related data necessary to support DHHS use, administration, reporting, and operation of the solution. Proprietary Conduent intellectual property and documentation maintained in escrow are excluded except as provided under the applicable escrow agreement. Conduent will organize the DED in multiple formats to support business and technical users, including:

- Alphabetical listings
- Database table listings
- Interface-specific views
- Report-specific views
- Data source mappings
- Business process mappings

The DED will be maintained under version control and made available through a secure documentation repository to authorize DHHS personnel.

## Governance and Maintenance

Conduent maintains all system documentation under formal configuration management and document governance controls.

The DED will include:

- Version number
- Publication date
- Revision history
- Change description
- Approval status
- Author and reviewer information

Changes are reviewed through established change management procedures before publication. Historical versions remain archived for audit and reference purposes. Authorized DHHS personnel will have continuous access to current and historical versions through the centralized document repository.

DHHS receives access to data definitions, data relationships, and supporting documentation necessary to operate, administer, audit, and support the solution, while proprietary Conduent intellectual property remains subject to the confidentiality and escrow provisions described above.

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| **CDT-20** | Solution documentation must include descriptions showing the flow of business processes, business rules, and interface(s) with DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide documentation describing business processes, business rules, and interfaces with DHHS necessary to implement, operate, and support the solution. Documentation will describe data flows, interfaces, inputs, outputs, and Nebraska-specific implementation details. Proprietary product information will be maintained as confidential. Conduent retains ownership of the software, while DHHS retains ownership of implementation-specific documentation and deliverables.

Conduent will provide documentation describing business processes, business rules, and interfaces with DHHS. Documentation will include process narratives, workflow diagrams, decision points, business rules, inputs, outputs, exception processing, and interface data flows. Interface documentation will describe file exchanges, integration points, data mappings, transmission methods, and processing requirements. Business process and interface documentation will be maintained under version control and updated as approved changes are implemented.

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| **CDT-21** | Solution must provide on-line help for all of its features, functions, and data element fields, as well as descriptions and resolutions for error messages, using help features including indexing, searching, tool tips, and context- sensitive help topics. Solution must also provide a customer service support line and subject matter expert staff to be available to assist with resolution of various questions related to the operations of the system. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide online help capabilities throughout the CMdS Rebate Administration solution for all system features, functions, workflows, screens, and data element fields. Users can access guidance while performing daily activities.

The solution's online help capabilities include:

- Searchable help content
- Indexed help topics
- Context-sensitive help links
- Field-level tool tips and definitions
- Step-by-step process guidance
- Frequently Asked Questions (FAQs)
- Error message descriptions and resolution guidance
- Role-based user assistance

Help content will include descriptions of system functionality, business processes, data fields, workflow steps, validation messages, and recommended corrective actions for common errors.

Conduent will maintain online help content to reflect approved system enhancements, configuration changes, business process updates, and regulatory requirements.

In addition to online help, Conduent will provide a customer service support line and access to qualified subject matter experts to assist DHHS users with operational, technical, and business-related questions. Support personnel will research issues, provide guidance, assist with troubleshooting, and coordinate resolution activities when additional expertise is required.

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| **CDT-22** | All solution documentation must be accessible to users online, with a printable version available. Browse and search capabilities must be provided to permit users to easily locate specific information in the documentation (e.g., training, user manuals, etc.). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will make all approved solution documentation available online to authorized DHHS users through a centralized documentation repository. Documentation, including user manuals, training materials, operational procedures, technical documentation, and reference guides, will be available in both online and printable formats.

The repository will provide:

- Browse capabilities organized by document type, functional area, and user role
- Full-text search capabilities to quickly locate specific topics, documents, keywords, and data elements
- Version-controlled access to current approved documentation
- Printable document formats for offline use
- Access to training materials, user manuals, operational procedures, and technical documentation from a single location

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| **CDT-23** | The solution user manual documentation must include full mock-ups of all screens/windows and provide narrative descriptions of the navigation features for each screen/window. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will develop user manual documentation that includes screen mockups, window layouts, navigation paths, and step-by-step instructions for all major system functions.

Each user guide will contain:

- Screen and window mockups
- Descriptions of fields, controls, and actions
- Navigation instructions
- Workflow diagrams
- Role-based procedures
- Examples and screenshots

Narrative descriptions explain how users navigate between screens, access system functions, complete tasks, and resolve common errors.

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| **CDT-24** | All solution documentation must be organized in a format that facilitates updating and maintenance, including version control. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will organize all solution documentation using a structured document management and governance framework that supports efficient maintenance, updating, and long-term usability. Documentation will be maintained within a centralized repository and organized by document category, functional area, and audience to support easy access and administration.

All documentation will be maintained under formal version control procedures. Each document will include:

- Unique document identifier
- Version number
- Effective date
- Revision history
- Document owner
- Approval status

Documentation updates will be managed through established change management and review processes. Revisions resulting from system enhancements, configuration changes, business process updates, regulatory changes, or operational improvements will be tracked and incorporated into the appropriate documentation. Historical versions will be archived and retained for audit and reference purposes.

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| **CDT-25** | Solution on-line tutorials must provide on-line access to the user manual and training materials. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide online tutorials that include direct online access to user manuals, training materials, job aids, reference guides, and other learning resources. Users will be able to access these materials from within the solution and through the centralized training and documentation repository.

Online tutorials will include:

- Links to applicable user manual sections
- Access to training presentations and recorded sessions
- Job aids and quick reference guides
- Step-by-step instructions and demonstrations
- Frequently Asked Questions (FAQs)
- Context-sensitive learning resources related to specific tasks and workflows

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| **CDT-26** | Solution documentation must include a user guide for the reporting management and repository feature. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will provide a Reporting Management and Repository User Guide that describes:

- Report creation and execution
- Report scheduling
- Parameter selection
- Report repository navigation
- Report search and retrieval
- Export functions
- User permissions
- Report retention and archive access

The guide includes screenshots, navigation instructions, workflow examples, and troubleshooting guidance.

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| **CDT-27** | Solution must provide and keep all system and user documentation current at the time changes and upgrades are applied to the system. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent updates all system, technical, operational, and user documentation as part of the release management process.

Before implementing upgrades or system changes, affected documentation is reviewed, revised, version controlled, and approved. Updated documentation is made available to DHHS users when the related change is deployed.

This process ensures documentation remains synchronized with production functionality.

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| **CDT-28** | Solution must use system design documents that utilize a widely supported modeling language (e.g., UML, BPMN). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Project-specific design documents will use industry-standard modeling techniques as appropriate for system architecture, business process modeling, workflows, interfaces. Technical design documentation will be escrowed with the solution code. Escrow materials will be released only upon specified release events defined in the escrow agreement and not solely as a result of contract expiration, transition activities, or procurement of a successor solution.

Conduent develops and maintains system design documentation in Visio to support the implementation, operation, and ongoing maintenance of the solution. Project-specific design artifacts, including architecture diagrams, process flowcharts, interface documentation, and technical design documents, are created and maintained throughout the project lifecycle to ensure clear communication, support knowledge transfer, and facilitate ongoing system maintenance. Documentation related to the proprietary design of Conduent's commercial CMdS Rebates solution is considered confidential and proprietary.

| | |
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| **CDT-29** | Solution must provide context sensitive help (situational clarification and support associated with process specific steps), to support user activities (e.g., maintenance activities). |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

The CMdS Rebate Administration solution provides context-sensitive help that delivers task-specific guidance directly within the application.

Features include:

- Field-level help text
- Tool tips
- Context-sensitive assistance
- Screen-specific help topics
- Error message explanations
- Step-by-step process guidance

Users can access help directly from the screen they are using without leaving the application.

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| **CDT-30** | Solution must retain the following files and data for the term of the contract.<br>a. CMS Unit Rebate Amounts<br>b. CMS Labeler Information<br>c. CMS Unit Rebate Offset Amounts<br>d. State Claims utilization information<br>e. State Managed Care Organization (MCO) information<br>f. State Drug description information<br>g. State Medicaid Provider information<br>h. State National Provider Identification (NPI) information<br>i. System Reference Files<br>j. CMS Utilization Data<br>k. State Supplemental Utilization Data<br>l. Quarterly Invoices |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent will retain all rebate-related files, reference data, operational records, invoices, utilization data, and supporting documentation for the duration of the contract and in accordance with all applicable Federal and State retention requirements.

The CMdS Rebate Administration solution maintains secure retention of:

- CMS Unit Rebate Amount files
- CMS Labeler files
- CMS Unit Rebate Offset Amount files
- State claims utilization files
- State Managed Care Organization information
- State drug description information
- Medicaid provider information
- State National Provider Identification (NPI) information
- System reference files
- CMS utilization data
- Supplemental rebate utilization data
- Quarterly invoices

All retained data is protected through:

- Role-based security
- Encryption
- Backup procedures
- Disaster recovery controls
- Audit logging
- Data integrity validation

Historical records remain searchable and accessible to authorized DHHS personnel throughout the contract term.

## Tools and Methods

- FedRAMP-certified cloud hosting
- Automated backups
- Disaster recovery environment
- Secure archival repositories
- Audit logging capabilities

| Staffing and Resource (SAR) | |
|---|---|
| **Number** | **Requirement Description** |
| **SAR-01** | Vendor must provide implementation and operational staff to support the following functions:<br>a. Project Management/Support (e.g. requirements, design, development, testing, implementation, etc.)<br>b. Development or Configuration Management / Coordination<br>c. Testing Management/Coordination<br>d. Training Management/Coordination<br>e. Certification Management/Coordination<br>f. System and Data Security Management/Coordination<br>g. Dispute resolution operations<br>h. Conversion adjustments and application review<br>i. Monetary invoicing threshold review |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Response

We provide dedicated implementation and operational staff with deep Medicaid drug rebate expertise to support Nebraska throughout implementation, transition, and ongoing operations. Our team works closely with DHHS stakeholders to deliver timely, accurate, and compliant services that strengthen program performance and maximize rebate collections.

### *a. Project Management/Support (requirements, design, development, testing, implementation, etc.)*

Our Project Manager leads all phases of the project, from requirements validation through implementation and operational stabilization. We develop and maintain the Project Management Plan, integrated schedule, risk and issue logs, communication plans, and status reporting. Our team facilitates stakeholder meetings, manages deliverables, coordinates resources, and provides transparent reporting. This approach enables DHHS to monitor progress and make informed decisions throughout the project lifecycle.

### *b. Development or Configuration Management/Coordination*

Our business analysts, configuration specialists, and technical resources collaborate with DHHS to validate requirements, configure system functionality, and support system enhancements. They manage configuration changes through a structured change management process, document all modifications, coordinate releases, and maintain alignment between business requirements, system functionality, and operational objectives.

### *c. Testing Management/Coordination*

Our testing team plans, coordinates, and manages all testing activities, including unit, integration, system, regression, and user acceptance testing. We develop test plans, test cases, and requirements traceability documentation, track and resolve defects, and provide detailed testing results. We work alongside DHHS staff to validate functionality and support successful production readiness.

### *d. Training Management/Coordination*

Our Training Lead develops and coordinates a comprehensive training program tailored to DHHS users, administrators, and operational staff. We deliver instructor-led training, knowledge transfer sessions, user guides, and system documentation. Training materials reflect current workflows and system functionality, enabling users to effectively perform their responsibilities from day one.

### *e. Certification Management/Coordination*

Our CMS certification specialists manage certification-related activities and collaborate with DHHS to support CMS certification objectives. We develop required certification documentation, track certification milestones, coordinate artifact collection, support readiness reviews, and provide subject matter expertise throughout certification activities to support federal compliance and funding requirements.

### *f. System and Data Security Management/Coordination*

Our security team manages system and data security activities in accordance with federal and State requirements. We maintain security documentation, coordinate security assessments, manage access controls, monitor compliance activities, and support incident response processes. Our staff work with DHHS and technical stakeholders to protect sensitive data and maintain a secure operating environment.

### *g. Dispute Resolution Operations*

Our rebate operations specialists manage dispute resolution activities with manufacturers and labelers. The team tracks disputes, researches supporting documentation, coordinates communications, monitors resolution status, and documents outcomes. Our proven dispute management processes help DHHS accelerate resolution timelines, improve collections, and maintain complete audit trails.

### *h. Conversion Adjustments and Application Review*

Our data conversion specialists plan, execute, and validate conversion activities, including data mapping, reconciliation, adjustment processing, and application review. We conduct multiple validation cycles, analyze discrepancies, document corrective actions, and collaborate with DHHS to confirm data accuracy and operational readiness before production deployment.

### *i. Monetary Invoicing Threshold Review*

Our operational team performs monetary invoicing threshold reviews as part of ongoing rebate operations. Using automated system controls and established review procedures, we identify invoices that meet defined threshold criteria, evaluate exceptions, support DHHS review activities, document findings, and provide reporting that promotes accurate invoicing, financial accountability, and program integrity.

Through this integrated staffing model, DHHS receives experienced project, technical, operational, training, security, certification, and rebate management resources that support program objectives and compliance requirements throughout the contract period.

| | |
|---|---|
| **SAR-02** | Vendor must provide technical operations support for all system related functionality. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Response: Technical Operations Support for All System-Related Functionality

We provide comprehensive technical operations support for all system-related functionality associated with the Nebraska Medicaid Drug Rebate (MDR) System. Our dedicated technical, operational, and support teams collaborate closely with DHHS to maintain system performance, support business operations, and deliver a stable, secure, and reliable solution throughout the contract term. Our approach combines proactive monitoring, responsive support, and continuous operational oversight to help DHHS achieve its program objectives.

Our technical operations team supports all production, test, and training environments and provides ongoing management of system functionality, configuration, interfaces, data processing, reporting, and operational workflows. Staff monitor system performance, identify and resolve issues, coordinate maintenance activities, and provide timely communication regarding system status and resolution efforts.

### *Monitoring and Performance*

We continuously monitor system availability, processing activities, operational metrics, and application performance to support reliable day-to-day operations. Our team proactively identifies performance trends, investigates potential issues, coordinates corrective actions, and communicates status updates to DHHS stakeholders. This proactive approach supports operational continuity, minimizes disruptions, and promotes consistent access to critical rebate management functions.

### *Configuration, Updates, and Change Management*

We manage application configuration, system updates, enhancements, and release activities through established configuration and change management processes. Our technical specialists evaluate proposed changes, coordinate deployments, document modifications, and validate functionality following implementation to support uninterrupted operations and alignment with DHHS business requirements.

### *Issue Management*

Our support team provides incident management, problem resolution, and root-cause analysis for system-related issues. Staff track issues from identification through resolution, collaborate with DHHS and external stakeholders as needed, and implement corrective actions that improve system reliability and operational efficiency.

### *Data Management*

We support all system integrations and data exchange processes, including monitoring interface performance, validating data transmissions, investigating exceptions, and resolving processing errors. Our team reviews data quality, reconciliation results, and operational metrics to support accurate rebate administration and financial processing activities.

### *Testing and Quality*

Our testing and quality management resources support technical operations through ongoing validation of system updates, patches, enhancements, and configuration changes. We conduct required testing activities, document results, and coordinate user validation activities before deploying changes into production.

### *Security and Compliance*

We maintain a dedicated security and compliance team that manages system access, supports security monitoring activities, coordinates security assessments, and protects sensitive Medicaid data in accordance with applicable State and federal requirements. Our team works closely with DHHS to address security-related issues and maintain required compliance documentation.

### *Ongoing Assistance and Training*

To support long-term operational success, we provide ongoing technical assistance, knowledge transfer, and user support. Our staff respond to questions, assist with troubleshooting, coordinate resolution activities, and provide guidance on system functionality, reporting, and operational processes. This collaborative approach enables DHHS users to maximize the value of the MDR system while maintaining efficient program operations.

Through this comprehensive technical operations model, DHHS gains a responsive, experienced team that actively supports all system-related functionality, promotes operational stability, supports regulatory compliance, and advances the successful administration of the Medicaid Drug Rebate Program.

| | |
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| **SAR-03** | Vendor must provide operational staff to support the following functions:<br>a. Disputes, Conversion adjustments and Monetary invoicing threshold review<br>b. Customer Support (DHHS staff and partners, labelers, CMS, etc.)<br>c. Training<br>d. System Maintenance |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Response: Operational Staffing Support

We provide dedicated operational staff with extensive Medicaid Drug Rebate Program experience to support ongoing program administration, stakeholder engagement, knowledge transfer, and system operations. Our operational team works as an extension of DHHS, delivering responsive support, accurate processing, and continuous operational oversight that advances program objectives and promotes efficient rebate management activities.

### *a. Disputes, Conversion Adjustments, and Monetary Invoicing Threshold Review*

Our rebate operations specialists manage all dispute-related activities, including research, documentation, tracking, manufacturer coordination, and resolution support. The team analyzes rebate discrepancies, maintains detailed audit trails, monitors dispute status, and facilitates timely resolution to support accurate rebate collections and program accountability.

Our conversion specialists support conversion adjustments and post-conversion reviews by validating migrated data, analyzing discrepancies, conducting reconciliations, and documenting corrective actions. Staff collaborate with DHHS and technical teams to review converted data and support a smooth transition of rebate operations.

Our operational team also conducts monetary invoicing threshold reviews using established business rules and system controls. Staff evaluate invoices meeting designated thresholds, investigate exceptions, support review activities, document findings, and provide operational reporting that promotes financial accuracy, transparency, and effective rebate administration.

### *b. Customer Support (DHHS Staff and Partners, Labelers, CMS, etc.)*

Our customer support staff serve as a central point of contact for DHHS personnel, business partners, labelers, manufacturers, CMS, and other authorized stakeholders. The team responds to inquiries, resolves operational issues, coordinates follow-up activities, and provides timely communication. Staff assist stakeholders with system functionality, rebate processes, reporting, and program operations. Through proactive stakeholder engagement and responsive service, we support productive collaboration across all participating organizations. Our staff document inquiries, track resolution activities, identify recurring issues, and provide operational feedback that supports process improvement and stakeholder satisfaction.

### *c. Training*

Our training specialists develop, coordinate, and deliver comprehensive training programs for DHHS users and authorized external stakeholders. We provide instructor-led training, user guides, job aids, knowledge transfer sessions, and ongoing training support to promote user proficiency and successful adoption of system functionality and business processes. Training materials are updated to reflect system enhancements, process modifications, and operational changes, enabling users to effectively perform their responsibilities throughout the contract period.

### *d. System Maintenance*

Our operational and technical support teams collaborate to maintain the Medicaid Drug Rebate System and support continuous operations. Staff coordinate routine maintenance activities, configuration updates, production support, issue resolution, release deployments, and operational monitoring. The team reviews system performance, supports testing of updates and enhancements, monitors interfaces and processing activities, and communicates maintenance activities to relevant stakeholders. This proactive approach supports reliable system operations, regulatory compliance, and uninterrupted access to critical rebate management functions.

Through this integrated operational support model, DHHS gains experienced professionals who provide dispute management, conversion support, invoicing oversight, stakeholder assistance, training services, and system maintenance support. Our team remains focused on delivering responsive service, operational excellence, and reliable support that advances Nebraska's Medicaid Drug Rebate Program objectives.

| Turnover and Contract Closeout (TCC) | |
|---|---|
| **Number** | **Requirement Description** |
| **TCC-01** | At least one hundred eighty (180) days before the end of the Contract, the Vendor must develop and implement a DHHS approved Turnover Plan. The Turnover Plan must be comprehensive detailing the proposed schedule, activities, and resource requirements associated with turnover tasks. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Turnover Plan

At least one hundred eighty (180) days before contract expiration, Conduent develops and implements a comprehensive Turnover Plan and submits it to DHHS for review and approval. The plan supports an orderly transition of MDR operations, technical services, system knowledge, and project assets. Our approach uses the project management, staffing, communication, risk, and deliverable governance processes established during Design, Development, and Implementation (DDI) and Maintenance and Operations (M&O) to provide DHHS with a structured, transparent, and low-risk transition framework. Consistent with RFP requirements, the Turnover Plan is maintained through completion of all transition activities and updated through approved change management processes as needed.

The Turnover Plan includes a detailed Work Breakdown Structure (WBS) and Schedule that identifies all turnover activities, task dependencies, responsible teams, resource assignments, estimated effort, start and finish dates, critical path activities, review cycles, and DHHS approval milestones. The schedule establishes measurable checkpoints and transition-readiness criteria, allowing DHHS to monitor progress and validate successful completion of turnover activities. Progress is tracked through regular status meetings, written reports, risk reviews, and issue-resolution activities throughout the turnover period.

Conduent documents and executes all turnover activities required to transition operational responsibility to DHHS or its designated successor. Activities include:

- Structured knowledge transfer sessions
- Operational and technical walkthroughs
- Transfer of system, configuration, interface, maintenance, and support documentation
- Delivery of data inventories and associated technical artifacts
- Review of open issues, maintenance activities, and enhancements
- Security and access transition activities
- Reporting and reconciliation support
- Final transition validation

We maintain comprehensive turnover inventories, tracking logs, and acceptance records to support accountability and traceability throughout the transition process.

## A Dedicated Team

Our transition team led by the Account Manager and supported by the Turnover/Transition Manager, MDR operational subject matter experts, system support personnel, and training resources execute the Turnover Plan. The plan contains a detailed resource matrix identifying roles, responsibilities, participation timelines, and estimated effort by turnover activity. Resource assignments follow the approved Staffing Management approach and provide continuity of support throughout the transition period.

## Knowledge Transfer

The Turnover Plan includes a formal Knowledge Transfer Plan designed to prepare DHHS personnel and/or a successor vendor to independently operate and support the MDR solution. Knowledge transfer activities include instructor-led sessions, operational process reviews, technical architecture reviews, configuration and maintenance walkthroughs, documentation reviews, and hands-on transition support. Training materials, operational procedures, system administration guides, interface specifications, configuration inventories, and support documentation are delivered as turnover artifacts and reviewed with designated stakeholders.

## Turnover Deliverables

All turnover deliverables follow the DHHS Deliverable Review and Approval Process (DRAP), including review cycles, comment resolution, updates, and formal acceptance procedures. Conduent submits turnover deliverables according to an approved schedule and collaborates closely with DHHS to address feedback and obtain written acceptance. Deliverables include the Turnover Plan, turnover schedule, resource matrix, knowledge transfer materials, documentation inventory, transition risk register, status reports, and turnover completion report.

Conduent incorporates a risk-based transition strategy that identifies potential operational, technical, staffing, security, and knowledge-transfer risks and documents mitigation and escalation procedures. Throughout the turnover period, we continue to support MDR operations and contractual responsibilities while executing transition activities, minimizing disruption and protecting business continuity. Through disciplined governance, experienced resources, comprehensive documentation, and collaborative planning, Conduent delivers a seamless transition that preserves institutional knowledge, supports uninterrupted MDR operations, and positions DHHS and its designated successor for long-term success.

| | |
|---|---|
| **TCC-02** | Vendor must work with the successor Vendor for data conversion activities from the current system to the proposed system. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Data Conversion Support for Successor Vendor

Conduent works collaboratively with DHHS and the successor vendor to support all data conversion activities required to transition MDR operations from the current environment to the replacement solution. Leveraging our experience implementing and supporting Medicaid drug rebate systems, data conversions, and operational transitions, we provide the technical, operational, and subject matter expertise necessary to facilitate a successful migration of MDR data and business processes.

As part of the transition process, Conduent participates in conversion planning sessions, data-mapping workshops, technical reviews, and readiness assessments with DHHS and the successor vendor. We coordinate activities through established project governance processes, including defined milestones, issue management, risk tracking, status reporting, and transition reviews.

Conduent provides the information and artifacts required to support conversion design, development, testing, and validation activities, including data extracts, data dictionaries, file layouts, interface specifications, configuration inventories, business rules, operational procedures, and supporting system documentation. Our MDR subject matter experts conduct technical and operational walkthroughs to explain source-system data structures, rebate processing workflows, dispute management activities, reporting requirements, and historical data considerations that may affect conversion planning and execution.

Throughout the conversion effort, Conduent supports data validation and reconciliation activities by reviewing conversion results, responding to questions, clarifying source-system data elements, and assisting with the identification and resolution of conversion issues. We maintain data transfer logs, conversion support records, issue logs, and turnover documentation to support traceability and accountability throughout the transition period.

Conduent continues supporting ongoing MDR operations while assisting with conversion activities, enabling DHHS and the successor vendor to complete the migration with minimal disruption to business operations. Through active collaboration, comprehensive documentation, and experienced MDR resources, Conduent facilitates transition of MDR data, system knowledge, and operational capabilities to the successor.

| | |
|---|---|
| **TCC-03** | Vendor must turnover all Nebraska data, including archived claims, to DHHS and the successor Vendor. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Turnover of Nebraska Data and Archived Claims

Conduent provides DHHS and the successor vendor with all Nebraska Medicaid Drug Rebate (MDR) data maintained under the Contract, including archived claims, historical claims records, rebate utilization data, invoice and dispute records, payment and reconciliation information, operational reports, audit history, configuration data, interface-related information, supporting metadata, and associated system documentation. This supports a complete transfer of the information and artifacts required to maintain MDR operations, support ongoing rebate activities, and facilitate future system administration.

As part of the turnover process, Conduent delivers comprehensive data extracts, archived claims files, historical transaction records, data dictionaries, file layouts, interface specifications, configuration inventories, reconciliation reports, and supporting documentation. Conduent subject matter experts and technical resources then conduct knowledge-transfer sessions and technical walkthroughs to explain source data structures, business rules, data relationships, reporting requirements, and historical processing considerations. This transfer of operational and technical knowledge provides DHHS and the successor vendor with the information necessary to understand, use, convert, and support the transferred data assets.

## Collaboration

Conduent collaborates with DHHS and the successor vendor to coordinate transfer schedules, review turnover inventories, support data conversion and validation activities, address questions regarding source-system information, and resolve issues identified during transition. Data turnover activities include documented transfer procedures, reconciliation support, validation checkpoints, issue tracking, and status reporting, providing transparency and accountability throughout the transition period.

## Audit and Tracing

To support auditability and traceability, Conduent maintains data transfer logs, turnover inventories, chain-of-custody records, issue logs, and turnover completion documentation. All transferred assets are documented and tracked through completion of the turnover process and DHHS acceptance activities.

By combining comprehensive data turnover, documented transfer procedures, and collaborative transition support, Conduent enables DHHS and the successor vendor to efficiently assume MDR program responsibilities while maintaining access to the historical data, records, and operational information necessary for ongoing program administration.

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|---|---|
| **TCC-04** | Vendor must turnover all documents and Repositories, in a format prescribed by DHHS. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Turnover of Documents and Repositories

Conduent will provide all contract-required documents, repositories, and Nebraska-owned information in a format prescribed by DHHS. Proprietary Conduent intellectual property will be maintained in escrow under a mutually agreed escrow agreement. Escrow materials will be released only upon specified release events defined in the escrow agreement and not solely as a result of contract expiration, transition activities, or procurement of a successor solution.

Conduent transfers all contract-required documents, repositories, deliverables, and Nebraska-owned information developed, maintained, or managed in support of the Nebraska MDR program. All materials are delivered to DHHS or the successor vendor in the format prescribed by DHHS. Transferred assets include project, operational, technical, administrative, training, maintenance, and governance documentation, along with associated repositories, inventories, version histories, and supporting artifacts required to support continued MDR operations and administration.

**Table TCC-1. Categories of Transferred Documents and Repositories**

| Project Documentation | Technical Repositories | Operational Documentation | Governance & Compliance Assets |
|---|---|---|---|
| Work Breakdown Structure (WBS) | Configuration Documentation | Standard Operating Procedures (SOPs) | DRAP Records |
| Integrated Master Project Schedule | Interface Specifications | Operational Reports | Deliverable Acceptance Records |
| Project Management Plan | Data Dictionaries & Metadata | Support & Maintenance Procedures | Risk & Issue Logs |
| Communication, Staffing, Risk & Change Management Plans | Requirements Traceability Matrix | Training Materials & User Guides | Change Management Records |
| | Repository Administration Documentation | Knowledge Transfer Materials | |

## Transfer of Artifacts

Conduent maintains complete inventories of turnover artifacts and transfers all approved contract-required documents, repositories, deliverables, and Nebraska-owned information to the State. All materials are organized, indexed, and delivered in accordance with DHHS-prescribed formats and submission requirements.

## Repository Support

Conduent provides repository documentation and administrative knowledge to support continued access, management, and use of transferred assets. Subject matter experts conduct repository walkthroughs and knowledge-transfer sessions covering repository structure, document organization, version history, governance processes, and operational usage considerations associated with transferred turnover assets. This supports efficient transition of institutional knowledge and facilitates ongoing management of MDR program assets.

Conduent collaborates with DHHS and the successor vendor to review inventories, validate transferred materials, address questions, and resolve discrepancies identified during turnover activities. Repository transfers include documented inventories, transfer logs, validation checkpoints, and acceptance tracking to provide transparency and accountability throughout the transition process.

## Audit

To support auditability and long-term stewardship, Conduent maintains documented chain-of-custody records, repository inventories, transfer confirmations, issue logs, and turnover completion records. All transferred contract-required documents, repositories, deliverables, and Nebraska-owned information remain traceable through completion of turnover activities and DHHS acceptance.

DHHS and the successor vendor receive a complete, organized, and accessible set of contract-required documents, repositories, deliverables, and Nebraska-owned information required to support ongoing MDR operations, maintenance, governance, and future program administration.

Conduent transfers all contract-required documents, repositories, deliverables, and Nebraska-owned information in the format prescribed by DHHS. This supports operational continuity, preservation of institutional knowledge, and a seamless transition of program responsibilities.

| Project Management and Implementation (PMI) | |
|---|---|
| **Number** | **Requirement Description** |
| **PMI-01** | Vendor must utilize, maintain, and facilitate an industry recognized project management process, tool, and documentation, such as the Project Management Institute's (PMI's) Project Management Body of Knowledge (PMBOK) or Scaled Agile Framework to complete the scope of work. Vendor must follow agreed upon project management lifecycle process, and work with DHHS project management resources to align activities and resources during the implementation and operations phases of the contract. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

Conduent uses Project Management Methodology (PMM), which aligns with the **PMBOK® Guide, Seventh Edition** and incorporates mature delivery practices from the **Capability Maturity Model Integration** (CMMI®) framework to complete the scope of work. Rather than creating project management processes from scratch, we tailor proven governance, reporting, templates, and controls used successfully across recent Medicaid implementations to meet DHHS requirements. Our implementation methodology combines PMI PMBOK® best practices, CMMI maturity level 3 standards, Medicaid Enterprise System (MES) implementation experience, CMS certification expertise, and proven Medicaid Drug Rebate implementation methodologies. We follow an agreed upon project management lifecycle process and works with DHHS project management resources to align activities and resources during the implementation and operations phases of the contract.

| | |
|---|---|
| **PMI-02** | Vendor must develop and maintain a Project Management Plan (PMP). The PMP minimally must include the following:<br>a. Executive Summary<br>b. Communications Management Plan<br>c. Change Management Plan<br>d. Staffing Management Plan<br>e. Quality Management Plan<br>f. Risk Management Plan<br>g. Issue Management Plan<br>h. Deliverable Review and Approval Process (DRAP)<br>i. Application Configuration and Maintenance Plan<br>j. Scope Management<br>k. Schedule Management Plan<br>l. Performance Management Plan |

| | |
|---|---|
| | The Vendor must maintain a defective ticket tracking system, which is readily available via direct access by DHHS staff. The vendor must also provide phone and email customer support related to defect reporting and management. The PMP must address this requirement.<br>The PMP plan must be reviewed and approved by DHHS staff, and any identified adjustments will be made prior to signoff. A sample of the PMP plan must be submitted with the Technical Response. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

A comprehensive Project Management Plan (PMP) is developed, maintained, and managed as a core component of our Project Management Methodology (PMM). The PMP defines the processes, inputs, outputs, roles, metrics, and governance activities required to initiate, plan, execute, monitor, and control all project activities. Our standardized and configurable project management framework aligns with DHHS requirements and supports continuous collaboration throughout the project lifecycle.

The PMP includes the following components:

- Executive Summary providing an overview of project objectives, governance, scope, approach, and critical success factors
- Communication Management Plan defining stakeholder communications, communication protocols, reporting activities, meeting management practices, stakeholder analysis, and communication schedules
- Change Management Plan establishing structured processes to submit, evaluate, approve, track, manage, and implement changes to hardware, software, documentation, scope, and schedule
- Staffing Management Plan describing project organization, resource planning, role assignments, responsibilities, and staffing oversight
- Quality Management Plan defining quality activities, performance standards, peer reviews, quality assurance, quality control, and performance management processes
- Risk Management Plan detailing risk identification, analysis, mitigation, monitoring, escalation, reporting, ownership, and resolution processes
- Issue Management Plan providing standardized procedures for issue identification, tracking, ownership, escalation, reporting, resolution, and closure
- Deliverable Review and Approval Process (DRAP) and Deliverable Expectation Documents (DEDs) governing deliverable development, reviews, submissions, feedback incorporation, approval workflows, and document retention
- Application Configuration and Maintenance Plan documenting configuration management processes, tools, procedures, maintenance activities, and system change controls
- Scope Management processes for establishing, maintaining, monitoring, and controlling the scope baseline throughout the project lifecycle
- Schedule Management Plan defining project work planning, milestone management, schedule maintenance, progress monitoring, critical-path management, and reporting activities
- Performance Management Plan incorporating project metrics, status reporting, performance standards, work performance information, and governance reporting

A standardized processes is maintained for managing defects, issues, risks, action items, and changes through centralized project management and collaboration tools. SharePoint supports tracking and monitoring of project information, including change requests, risks, issues, and action items, while Azure DevOps supports requirements management, traceability, assignments, and work management activities. These tools provide DHHS visibility into project status, issue resolution, and project performance.

Customer support channels provide for issue reporting, defect management, and project communications. Our communication management processes establish communication methods, stakeholder contacts, reporting frequencies, escalation procedures, and status reporting requirements to support timely coordination and resolution activities.

During project planning, the PMP is reviewed and all supporting plans with DHHS stakeholders to align project management standards, processes, documentation, and reporting requirements. We incorporate DHHS feedback, update plan components as needed, and maintain the approved PMP throughout the project lifecycle to reflect project evolution and continuous improvement. See the Work Plan document for the full PMP with milestones, activities, and deliverables.

| | |
|---|---|
| **PMI-03** | Vendor must utilize, maintain, and facilitate Risk Management Plan/Process, Issue Management Plan/Process supporting documentation, and tools (such as a RAID log) to manage project issues and risks. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

Risk management is treated as a continuous lifecycle activity rather than a periodic project exercise. We use, maintain, and facilitate our Risk Management Plan and Issue Management Plan that supports documentation, and tools, including a RAID log, to manage project issues and risks. Our team identifies, evaluates, prioritizes, mitigates, and monitors risks throughout implementation using a formal Risk and Issue Management process. Figure PMI-1 details our Proactive Risk Management lifecycle.

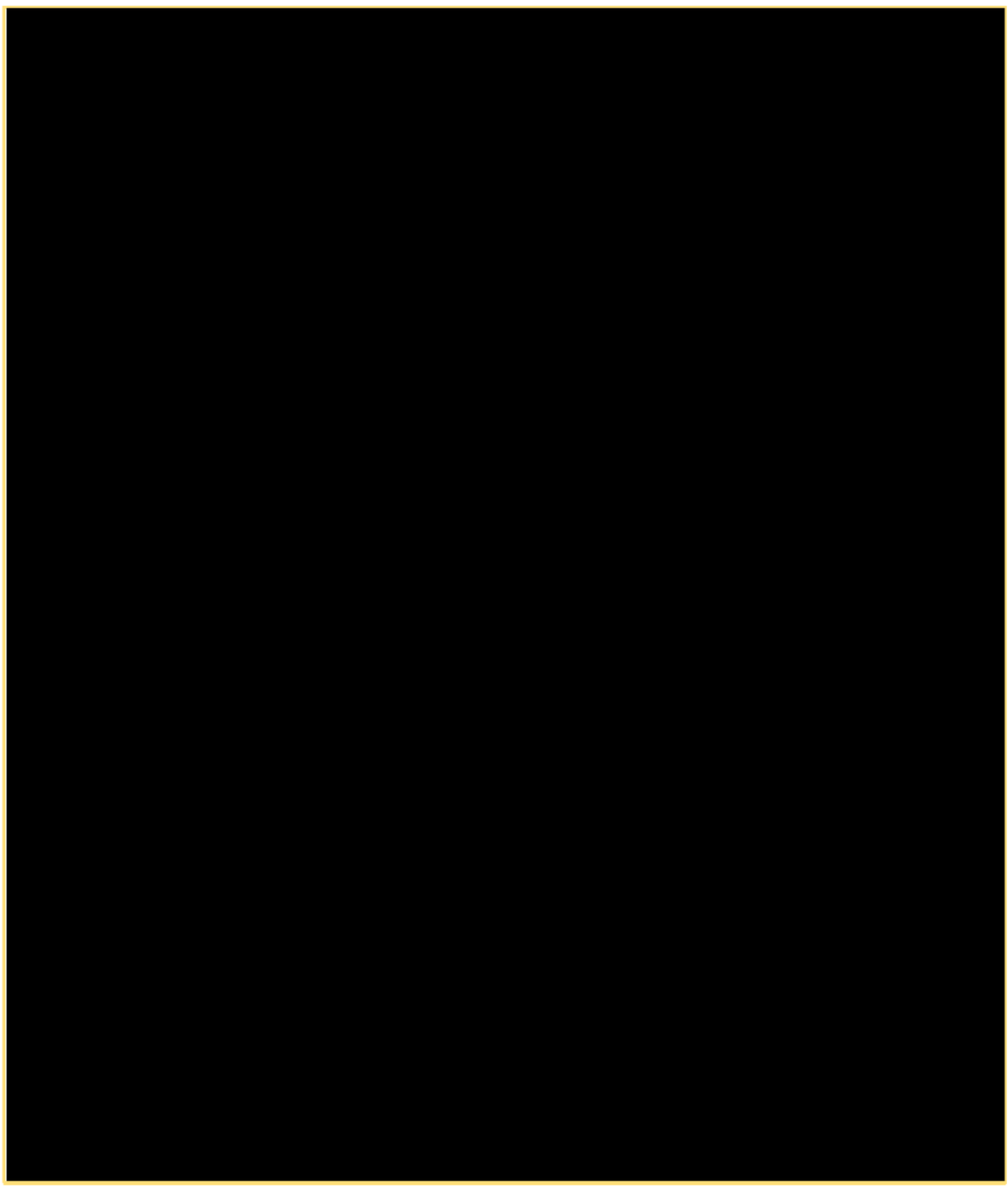


**Figure PMI-1.** [redacted]

We regularly use and maintain a centralized RAID (Risks, Actions, Issues, and Decisions) repository to track all project risks and issues. The repository provides full transparency into mitigation activities, status updates, ownership assignments, and resolution timelines.

The framework categorizes all risks and issues that arise from low to critical and escalation paths are documented and integrated into governance meetings. DHHS, Conduent, and stakeholders may submit risks or issues through our centralized RAID repository. Resolution status is monitored through weekly status reporting. Roles and responsibilities are also a key part of this framework. Each risk and issue has an assigned owner, a target resolution date, a mitigation plan, and an escalation plan. Each risk or issue is then defined and categorized by defined levels from negligible to severe. The matrix determines prioritization, response strategy, and escalation requirements.

| | |
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| **PMI-04** | Vendor must participate in all levels of project governance as necessary, to include, but are not limited to the steering and operating committees and change control board. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

Our implementation methodology fully supports a formal project governance framework and active participation at all governance levels throughout the Medicaid Drug Rebate (MDR) system implementation and operational transition. We recognize that effective governance is critical to maintaining executive alignment, managing project risks, resolving issues promptly, controlling scope, and ensuring successful delivery of project objectives.

Conduent's governance approach establishes and maintains a multi-tier governance model aligned with DHHS governance requirements and industry-standard PMBOK project management practices. Key project resources, including the Executive Sponsor, Account Manager, Project Manager, Solution Architect, Business Lead, and other subject matter experts (SMEs), participate in governance forums as appropriate based on the topic, decision authority, and escalation level.

**Table PMI-1. Project Governance Structure and Responsibilities**

| Governance Body | Conduent Participation | Primary Responsibilities |
|---|---|---|
| Executive Steering Committee | Executive Sponsor, Account Manager, Project Director | Strategic oversight, milestone reviews, executive decision-making, risk escalation, budget and schedule management |
| Operating Committee | Project Manager, Business Leads, Technical Leads, SMEs | Day-to-day project oversight, status review, issue resolution, deliverable tracking, dependency management |
| Change Control Board (CCB) | Project Manager, Solution Architect, Business Analyst, Technical Lead | Review, impact analysis, approval/rejection of change requests, scope management, schedule and resource assessment |
| Ad Hoc Governance Sessions | Appropriate SMEs | Topic-specific decision support, technical reviews, interface discussions, testing readiness, and operational planning |

**Governance Meeting Management.** Governance activities are supported by preparing and distributing meeting agendas at least 24 hours before the meeting. We facilitate Steering Committee, Operating Committee, and CCB meetings, documenting decisions, action items, risks, issues, and approvals. Meeting minutes are distributed within 48 hours following each meeting. When ad-hoc governance sessions are requested, we provide the appropriate SMEs to participate. We maintain governance artifacts in a centralized project repository accessible to authorized DHHS personnel, and provide project dashboards and status reports that include:

- Schedule Status
- Milestone Progress
- Budget Tracking
- Risks and Mitigation activities
- Open Issues and Escalations
- Resource Status
- Change Request Status and Impacts

**Change Control Board Participation.** We actively support and participate in the CCB process by:

- Documenting and submitting change requests
- Performing impact analyses for scope, schedule, cost, resources, testing, and operational readiness
- Presenting recommendations and alternatives to DHHS
- Maintaining a comprehensive Change Log and audit trail
- Not implementing changes that have not been formally approved and authorized by DHHS

| | |
|---|---|
| **PMI-05** | Vendor must participate in and capture notes from all necessary project meetings. The Vendor must be responsible for creation and dissemination of all project meeting agendas, minutes, and necessary documentation. Agendas should be submitted 24 hours in advance of meetings. Minutes should be delivered within 48 hours. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

Project support includes preparing and distributing meeting agendas at least 24 hours before each scheduled project meeting. Project teams capture project status, deliverable progress, milestone achievement, schedule performance, risks, issues, action items, staffing updates, solution changes, and completed work. Teams also document meeting decisions, action items, risk mitigation activities, issue resolution efforts, and resulting work products. Meeting minutes are distributed within 48 hours following each meeting.

| | |
|---|---|
| **PMI-06** | Vendor must facilitate a project initiation kickoff meeting with key stakeholders and create a kickoff meeting presentation targeted to specific scope and audiences. The presentation must be submitted to and approved by DHHS 2 weeks prior to kickoff. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

A comprehensive Kickoff Presentation is developed and submitted at least two (2) weeks prior to the Leadership Kickoff meeting for review, prior to the Leadership and Project Kickoff meetings. The presentation serves to establish a shared understanding of project objectives, scope, governance structure, implementation methodology, key milestones, deliverables, resource assignments, risks, assumptions, and communication protocols. The presentation and Kickoff meetings serve as the foundation for project planning and stakeholder alignment. The Project Manager facilitates the presentation, documents decisions and action items, and incorporates DHHS feedback into subsequent project planning deliverables, including the Project Management Plan, Integrated Master Schedule, and Work Breakdown Structure.

| | |
|---|---|
| **PMI-07** | Vendor must provide all deliverables and/or documentation as identified in the project work plan. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

All RFP-required deliverables and supporting documentation are incorporated into the approved Project Work Plan (PWP). The PWP identifies each deliverable, responsible owner, due date, dependencies, review period, and approval milestone.

Before submission to DHHS, each deliverable undergoes peer review and document quality assurance review. Conduent then submits the deliverable through the approved review and approval process, tracks comments through resolution, and stores working and final versions in the project SharePoint repository. After DHHS approval, the deliverable is baselined and maintained under configuration control. Updates follow the approved change control process. If a delay or significant revision is required, we coordinate with DHHS to assess the impact, establish a resolution path, assign actions, and update the PWP and schedule as approved.

| | |
|---|---|
| **PMI-08** | Vendor must utilize, maintain, and facilitate a deliverable development and maintenance process. The Vendor must take the following into account in the process:<br>a. Deliverables must be delivered in a consistent format that includes change history, version control, and approval page.<br>b. The Vendor must provide a Deliverable Expectations Document (DED) for each deliverable that describes the purpose, content, applicable Certification minimum required content and industry standards (e.g., PMI, IEEE/ISO, CMS XLC) that are satisfied for each Deliverable. Each DED is a deliverable.<br>c. The size and complexity of the deliverables must be considered when determining the length of time available for reviewing cycles. Collaboration with DHHS staff for review turnaround expectations is required.<br>d. Any change control processes must be taken into consideration.<br>e. Vendor facilitated walkthroughs of draft deliverables must be used when requested.<br>f. DHHS staff capacity to support simultaneous review of numerous deliverables.<br>g. Deliverables should not require more than 3 submissions. Utilize collaboration sessions to reach consensus.<br>h. All deliverable submissions must meet acceptable quality standards (grammar, spelling, punctuation, completeness). |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

For each deliverable identified in the Project Work Plan, a corresponding Deliverable Expectations Document (DED) is developed that defines the deliverable's purpose, scope, required content, applicable CMS certification criteria, industry standards – PMI, IEEE/ISO, CMS XLC - acceptance criteria, review participants, and approval requirements. The DED is submitted to DHHS for review and approval. The DED serves as a foundational governance artifact that aligns stakeholder expectations before document development begins and supports successful certification activities where applicable.

Deliverable development begins after the DED is approved by DHHS. All project artifacts are delivered using standardized templates that include document versioning, change history, approval signatures, author and reviewer information, document status, and traceability to project requirements. This structured approach promotes consistency across all deliverables and simplifies review, maintenance, auditability, and knowledge transfer.

Large, complex deliverables require greater stakeholder engagement. Conduent collaborates closely with DHHS to establish practical review schedules that account for document complexity, certification requirements, project priorities, and staff availability. Deliverable timelines are incorporated into the Integrated Master Schedule and coordinated with project governance activities to avoid review bottlenecks and excessive simultaneous submissions.

Before submission, every deliverable undergoes internal quality assurance reviews to verify completeness, consistency, readability, technical accuracy, compliance with contractual requirements, and adherence to professional documentation standards. Deliverables are submitted that reflect high-quality workmanship, including proper grammar, spelling, punctuation, formatting, and content integrity, ensuring DHHS receives deliverables that are review-ready and professionally presented.

We facilitate working sessions, formal walkthroughs, comment-resolution meetings, and collaborative review workshops whenever requested by DHHS. Our project teams actively engage stakeholders throughout document development, allowing questions, concerns, and recommendations to be addressed early rather than during formal review periods. This collaborative model promotes consensus-building and supports the objective of obtaining approval within three submissions or fewer.

A proven Deliverable Review and Approval Process (DRAP) is applied that combines disciplined project controls, collaborative stakeholder engagement, and stringent quality management to ensure every project deliverable meets DHHS expectations on the first submission whenever possible. Our approach establishes clear deliverable expectations, promotes transparency, and provides DHHS with complete visibility into deliverable development, review, and approval activities throughout the project lifecycle.

All approved change control procedures are incorporated into the deliverable lifecycle. Changes affecting scope, content, schedule, certification requirements, or acceptance criteria are documented, evaluated, and managed through the established project governance and Change Control Board processes, enabling alignment between deliverables and approved project baselines.

All deliverable submissions are reviewed and meet acceptable quality standards, including grammar, spelling, punctuation, and completeness.

This collaborative and quality-focused methodology enables us to consistently produce high-quality deliverables, streamline approval cycles, support CMS certification readiness, and maintain project momentum while reducing administrative burden on DHHS staff.

| | |
|---|---|
| **PMI-09** | Vendor must submit and update a project status report to support the steering and operating committee meetings. The report must contain the following at a minimum:<br>a. Current project work plan and schedule with percentage complete for milestones and tasks.<br>b. Overall completion status.<br>c. All past due tasks or milestones and the plan(s) for completing them.<br>d. Planned tasks and activities for the next 30 days.<br>e. Identification of any staffing issues or changes.<br>f. Current status on all identified issues and mitigation proposed.<br>g. Current status on all identified risks and mitigation steps.<br>h. Current status on testing and metrics.<br>i. Current status on performance standards.<br>Vendor must deliver and update the project status report monthly and submit to DHHS within five (5) calendar days of the end of the prior month. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Conduent Project Status Reporting Approach

A comprehensive monthly Project Status Report is provided that supports Steering Committee and Operating Committee oversight. The report promotes informed decision-making, and provides DHHS with complete visibility into project performance. This includes schedule execution, resource utilization, testing progress, risks, issues, and operational readiness. Our reporting approach aligns with PMBOK project management best practices. The Project Manager compiles, validates, and submits the report within five (5) calendar days following the end of each reporting month. A sample screenshot is provided in Figure PMI-2.



**Figure PMI-2.**

PROPRIETARY INFORMATION

### *a. Current Project Work Plan and Schedule with Percentage Complete for Milestones and Tasks*

An Integrated Master Schedule is maintained in Microsoft Project and includes the following in each monthly report:

- Current Project Work Plan status
- Milestone completion percentages
- Task completion percentages
- Critical path activities
- Planned versus actual progress
- Schedule variances and corrective actions

This reporting provides DHHS with a clear view of project execution and adherence to approved timelines.

### *b. Overall Completion Status*

We provide an executive-level summary of overall project health that includes:

- Overall project completion percentage
- Current implementation phase
- Key accomplishments during the reporting period
- Progress toward major milestones
- Readiness indicators

Project status utilizes standard Green/Yellow/Red health indicators to facilitate rapid governance review and decision-making.

### *c. All Past Due Tasks or Milestones and Plans for Completing Them*

All overdue tasks and milestones are identified and reported, including:

- Delayed activities
- Schedule impact assessments
- Root cause analysis
- Recovery strategies
- Revised completion dates
- Assigned owners

The Project Manager tracks corrective actions through governance forums until resolution.

### *d. Planned Tasks and Activities for the Next 30 Days*

Each report includes a forward-looking 30-day execution plan identifying:

- Scheduled deliverables
- Design and configuration activities
- Testing events
- Training activities
- Governance meetings
- Upcoming decision points
- CMS certification-related activities, as applicable

This planning outlook supports stakeholder coordination and resource planning.

### *e. Identification of Any Staffing Issues or Changes*

Transparency into project resource management is provided by reporting:

- Current staffing assignments
- Key personnel changes
- Resource availability concerns
- Vacancy status, if applicable
- Mitigation actions for staffing impacts
- Resource utilization trends

This approach enables proactive management of project staffing and continuity.

### *f. Current Status on All Identified Issues and Proposed Mitigation*

An active Issue Log and Reports is maintained that includes:

- Open issues
- Business and technical impacts
- Severity and priority levels
- Assigned ownership
- Resolution activities
- Escalation status
- Target resolution dates

Issue resolution progress receives regular review through Operating Committee and project governance meetings.

### *g. Current Status on All Identified Risks and Mitigation Steps*

A formal RAID methodology is used and reports:

- Current project risks
- Probability and impact assessments
- Risk exposure ratings
- Mitigation strategies
- Contingency plans
- Emerging risks
- Risk trend analysis

This proactive risk management process supports informed decision-making and minimizes implementation disruptions.

### *h. Current Status on Testing and Metrics*

Detailed testing dashboards and quality metrics are provided that include:

- Testing phase status
- Test case execution results
- Pass/fail percentages
- Defect counts by severity
- Defect aging and closure trends
- User Acceptance Testing progress
- Performance testing results
- Security testing results
- Accessibility testing status

Testing metrics undergo validation before reporting to ensure accuracy and consistency.

### *i. Current Status on Performance Standards*

Performance standards and key project metrics are monitored and reported, including:

- Schedule performance
- Deliverable performance
- Defect management performance
- Issue resolution performance
- Staffing utilization metrics
- Service level compliance
- Quality management metrics
- CMS certification readiness indicators, where applicable

Performance results are compared against approved project baselines, and corrective actions are documented when variances occur.

| | |
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| **PMI-10** | Vendor must develop and maintain a detailed project work plan (PWP) that includes milestones, tasks, planned start and finish dates, actual start and finish dates, work hours, and assigned resources. The PWP must be developed and maintained in Microsoft Project or other state-approved software and be represented visually (e.g. Gantt Chart). The Vendor must provide DHHS with the PWP in Adobe PDF and Microsoft Excel formats. A sample of the PWP must be submitted with the Technical Response. Vendor must deliver the draft PWP to DHHS within thirty (30) calendar days of contract signing and update weekly throughout implementation. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

A detailed project work plan (PWP) is developed and maintained that includes milestones, tasks, planned start and finish dates, actual start and finish dates, work hours, and assigned resources. We begin by developing the Project Schedule by starting with a standardized work plan from our Project Management Methodology (PMM). Then it is aligned to the project's lifecycle phases, tasks, milestones, deliverables, resource requirements, and contractual objectives. Detailed task decomposition, dependencies, resource assignments, historical project data, and subject matter expertise are used to create a predictive schedule. The schedule also defines activities, durations, critical path elements, and milestone dates. During project planning, we review and refine the schedule collaboratively with DHHS to establish a mutual understanding of project activities, deliverables, milestones, and maintenance standards to create the PWP. While it is developed and maintained in Microsoft project, it is also provided in Adobe PDF and Microsoft Excel formats, all of which visually represent the PWP in a Gantt Chart. A sample of the PWP is submitted along with our Technical Response, and the draft is delivered to DHHS within thirty (30) calendar days of contract signing and updated weekly throughout implementation.

We understand that Nebraska expects the DDI effort to be completed within twelve (12) months of Project Kickoff. Experienced project leadership, certified project management professionals, Medicaid Drug Rebate Subject Matter Experts (SMEs), business analysts, technical architects, data migration specialists, and certification experts are dedicated to maintain momentum and keep the project on schedule. Our implementation framework incorporates milestone reviews, readiness assessments, critical-path monitoring, and executive governance throughout the project lifecycle to prevent delays and support successful delivery.

The timeline below assumes a Project Kickoff date of Month 0 and demonstrates our ability to complete DDI within the State's targeted twelve-month implementation window while maintaining schedule flexibility within the eighteen-month maximum period. The proposed timeline conforms with the required timeframes outlined in Section (V)(H)(3). Figure PMI-3 details the key milestones of our highly configurable CMdS solution.



**Figure PMI-3.** [redacted]

PROPRIETARY INFORMATION

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| **PMI-11** | Vendor must utilize the DHHS project repository for maintaining project documentation and deliverables. DHHS currently uses Microsoft SharePoint and will provide access to the Vendor's staff. The Vendor must provide Microsoft SharePoint training for the Vendor's staff as necessary. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Conduent Approach

It is important to maintain a centralized, secure, and accessible project repository to support project governance, collaboration, auditability, and deliverable management throughout the implementation lifecycle. Consistent with DHHS requirements, we use the DHHS-designated Microsoft SharePoint repository as the system of record for project documentation, deliverables, project plans, status reports, meeting materials, governance artifacts, testing documentation, and other project-related work products.

## Repository Management

Conduent establishes project document management procedures that align with DHHS governance standards and SharePoint administration practices. Our project team maintains all approved project artifacts within the DHHS SharePoint environment and organizes content using a structured repository framework that supports:

- Version control and document history
- Deliverable management and approval tracking
- Document check-in/check-out procedures
- Project correspondence and meeting documentation
- Governance and committee materials
- Testing and certification artifacts
- Audit readiness and traceability

This approach provides DHHS stakeholders with real-time access to current project information and maintains a complete record of project activities and decisions.

## SharePoint Utilization Standards

Conduent leverages Microsoft SharePoint to:

- Store and manage all project deliverables and supporting documentation
- Maintain document versioning and change history
- Track deliverable review and approval status

- Facilitate collaboration between DHHS and project stakeholders
- Support project governance, including Steering Committee, Operating Committee, and Change Control Board activities
- Maintain a centralized repository for CMS certification artifacts, project plans, testing documentation, and operational readiness deliverables
- Access controls and permissions are managed in accordance with DHHS policies to protect sensitive project information and ensure appropriate stakeholder access

## SharePoint Training and User Readiness

Conduent assesses project team familiarity with Microsoft SharePoint during project initiation and provides SharePoint orientation and role-based training as needed for effective repository use. Training focuses on:

- Repository navigation and organization
- Document storage and retrieval
- Version management
- Collaboration features
- Deliverable submission processes
- Approval workflows
- Security and access protocols

This approach enables staff to efficiently use the DHHS SharePoint environment while adhering to established project governance and document management procedures.

| | |
|---|---|
| **PMI-12** | Vendor must develop and maintain an Implementation Plan (IP) that includes pre-Go Live, Go Live, and post-Go Live activities and implementation progress reporting. Post-Go Live activities must include an online end user survey to solicit feedback on the implementation results. Vendor must resolve customer friction points as identified through customer inquiries. The Vendor must submit the draft IP to DHHS for review and approval. Vendor must deliver the draft IP to DHHS within six (6) months of Go Live date and update weekly throughout implementation. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Implementation Planning and Go-Live Approach

An implementation methodology is employed that emphasizes operational readiness, stakeholder preparedness, deployment success, and continuous improvement. Consistent with the Nebraska MDR implementation timeline, we develop and maintain a comprehensive Implementation Plan (IP) that governs all activities leading to Operational Readiness and Go-Live, including pre-Go Live preparation activities in Month 11 and production deployment activities in Month 12. The IP serves as the primary roadmap for coordinating technical, operational, training, communication, and deployment activities across all project stakeholders.

## Implementation Plan Development and Maintenance

The Implementation Plan is prepared and submitted as a draft to DHHS no later than six (6) months prior to the approved Go-Live date. The plan undergoes collaborative review with DHHS stakeholders and remains subject to ongoing refinement throughout the implementation lifecycle. The Plan is updated weekly to reflect project progress, approved changes, emerging risks, readiness activities, and deployment milestones. Updates are maintained within the DHHS project repository and incorporated into regular project status reporting and governance reviews.

## Pre-Go Live Activities

The Implementation Plan includes detailed pre-Go Live activities designed to support operational readiness and deployment preparedness, including:

- Operational Readiness Review (ORR) activities
- Implementation readiness assessments
- User Acceptance Testing validation and signoff
- Data conversion and migration readiness
- Interface validation and deployment readiness
- Security and access provisioning
- Business continuity and contingency planning
- Cutover and rollback procedures
- Training completion verification
- Communication and stakeholder readiness activities
- Go/No-Go decision criteria and governance reviews

These activities provide DHHS with measurable readiness indicators before production deployment.

## Go-Live and Production Deployment Activities

Conduent coordinates all production deployment activities through a controlled implementation process that includes:

- Final deployment readiness validation
- Approved cutover execution plan
- Production environment validation
- Real-time deployment monitoring
- Issue escalation and resolution procedures
- Command center support
- Executive and operational status reporting
- Go-Live performance monitoring

Our project leadership, technical resources, business analysts, and subject matter experts actively support deployment activities to facilitate a successful transition into production operations.

## Post-Go Live Activities and Customer Experience Management

A comprehensive post-Go Live support and stabilization plan is executed following deployment that is designed to promote user adoption, operational effectiveness, and customer satisfaction. Post-Go Live activities include:

- Hypercare support
- Production monitoring and stabilization
- Performance and operational reporting
- User support and issue resolution
- Knowledge transfer activities
- Transition to operations and maintenance support

To gather direct stakeholder feedback, an online end-user survey following Go-Live is administered. Survey results are analyzed to identify implementation strengths, improvement opportunities, training gaps, and user experience concerns. Survey findings are incorporated into continuous improvement activities and corrective action planning.

## Resolution of Customer Friction Points

Conduent maintains a formal process for capturing, analyzing, prioritizing, and resolving customer friction points identified through:

- End-user survey responses
- Customer inquiries
- Help desk interactions
- Stakeholder meetings
- Operational support activities
- Project governance forums

Issues affecting user experience, business operations, training effectiveness, or system usability are documented, assigned ownership, and tracked through resolution. Progress and resolution status are communicated through established project governance and operational reporting processes. This proactive approach promotes user satisfaction and successful operational adoption.

## Reporting and Governance

Implementation progress reporting is integrated into weekly project management activities and monthly governance reporting. Progress updates include:

- Completion status of implementation activities
- Operational readiness progress
- Cutover readiness status
- Go-Live milestones
- Outstanding risks and issues
- Customer feedback trends
- Post-Go Live stabilization metrics

This governance-driven methodology provides DHHS with continuous visibility into implementation readiness, deployment execution, and operational transition activities while supporting a successful Month 12 Go-Live and production deployment.

| | |
|---|---|
| **PMI-13** | Vendor must develop and maintain a Communication Management Plan. The Vendor must submit the draft plan to DHHS for review and approval. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

A comprehensive Communication Management Plan is developed during the Project Initiation and Planning phase and submitted with the PWP for DHHS review and approval. It promotes transparency, accountability, and stakeholder engagement, and is maintained by the Project Manager. Information gathered through feedback mechanisms may lead to updates in the Plan. Figure PMI-4 describes each component of the Plan, including the target audiences, objectives, channels, feedback, responsibilities, and schedules.




**Figure PMI-4. Communication Management Plan**

*The Communication Management Plan promotes transparency, accountability, and stakeholder engagement.*

The Communication Management Plan is structured into six core areas. It identifies key **Target Audiences**, such as project leadership, end users, and other project stakeholders. There are clear **Objectives** focused on informing progress, supporting decision-making, and mitigating risks. To maintain alignment, it details specific **Channels** (like Microsoft Teams and dashboards) and a structured **Schedule** of recurring weekly and monthly meetings. Finally, the plan defines accountability through structured **Responsibilities** (mapping owners, frequencies, and methods) and establishes formal **Feedback Mechanisms**, such as workshops and surveys, for continuous collaboration.

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| **PMI-14** | Vendor must utilize, maintain, and facilitate an industry recognized systems development lifecycle process, and documentation, in order to implement Solution. Documentation must include environment configuration, code migration and deployment processes. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Conduent Systems Development Lifecycle (SDLC) Approach

A Hybrid-Agile Systems Development Lifecycle (SDLC) methodology is used that supports the planning, design, configuration, development, testing, deployment, and ongoing maintenance of the Medicaid Drug Rebate (MDR) solution. Our SDLC framework incorporates project management, quality assurance, security, configuration management, change control, and deployment governance practices to promote consistency, traceability, and successful implementation outcomes.

## SDLC Governance and Documentation

Comprehensive SDLC documentation is maintained throughout the project lifecycle and all approved artifacts are stored within the DHHS project repository. Documentation supports project governance, auditability, knowledge transfer, operational readiness, and CMS certification activities. Key SDLC artifacts include:

- Requirements Traceability Matrix (RTM)
- Solution Design Documentation
- Configuration Documentation
- Test Plans and Test Results
- Change Control Documentation
- Release and Deployment Plans
- Environment Management Documentation
- Operational Readiness Documentation
- Production Support Procedures

Each artifact follows standardized version control, change history, review, and approval processes consistent with the Deliverable Review and Approval Process (DRAP).

## Environment Configuration Management

All implementation environments, including development, testing, training, staging, and production environments are developed and maintained. Environment documentation includes:

- Environment architecture and purpose
- Hardware and software configurations
- Security controls and access management
- Interface configurations
- Database configurations
- Integration endpoints
- Environment promotion criteria
- Environment readiness checklists

This structured approach promotes consistency across environments and supports repeatable deployments throughout implementation and operations.

## Code Migration and Change Management

Formal configuration and change management processes are employed to govern application updates, configuration changes, enhancements, and defect corrections. All code and configuration changes follow documented promotion procedures that include:

- Change request documentation
- Impact assessment and approval
- Configuration management controls
- Code review and quality validation
- Testing and defect remediation
- Release readiness assessments
- Change Control Board review, when required
- Deployment authorization

This provides full traceability from development through production deployment and supports compliance with DHHS governance requirements.

## Deployment Management

Documented deployment procedures are maintained that define how application code, configuration updates, interfaces, reports, and related components move between environments and into production. Deployment documentation includes:

- Deployment schedules
- Release content and scope
- Deployment runbooks
- Validation procedures
- Rollback and contingency procedures
- Production verification activities
- Post-deployment monitoring and support activities

Deployment activities are coordinated through project governance processes and integrated with Operational Readiness and Go-Live planning activities to support a controlled and successful production transition.

## Quality Assurance and Continuous Improvement

Quality assurance is integrated into activities throughout the SDLC lifecycle to verify that all configurations, code migrations, and deployments meet established requirements and quality standards. Because of our extensive MDR experience, our Internal reviews, testing validation, configuration audits, and deployment checkpoints help ensure solution stability, security, and operational readiness. This disciplined SDLC approach provides DHHS with a repeatable, transparent, and well-governed implementation framework that supports successful delivery of the Nebraska Medicaid Drug Rebate Solution.

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| **PMI-15** | Vendor must utilize, maintain, and facilitate an industry recognized requirements management process, tool, and supporting documentation to elicit, document, and maintain the Vendor's solution requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

A mature requirements management methodology is applied using Azure DevOps, that provides complete visibility, traceability, governance, and control throughout the MDR System lifecycle. We combine structured business analysis practices, collaborative stakeholder engagement, formal change management procedures, and industry-standard requirements management tools to capture, validate, maintain, and manage requirements from project initiation through operations and maintenance.

The CMdS MDR solution leverages existing and proven MDR capabilities that satisfy much of functional and operational requirements through existing product capabilities. This allows the project team to focus implementation activities on DHHS specific system configuration, interface integration, data conversion and migration planning, and project-specific operational needs. As a result, we prioritize these specialized areas rather than investing effort in extensive custom development. Requirement activities begin with a comprehensive discovery and requirements elicitation process involving DHHS stakeholders, business owners, subject matter experts, technical teams, and integration partners. Through facilitated workshops, interviews, document reviews, business process analysis, use case development, and requirements validation sessions, we identify and document functional, technical, interface, reporting, security, conversion, operational, and compliance requirements. This collaborative approach promotes a shared understanding of business objectives and supports alignment between DHHS expectations and the proposed MDR solution.

Our requirements management framework incorporates industry best practices from the International Institute of Business Analysis (IIBA), Project Management Institute (PMI), and CMS guidance for Medicaid Enterprise Systems. Requirements are documented using standardized templates and methodologies that support consistency, quality, completeness, and auditability. Conduent utilizes enterprise-grade requirements management and lifecycle management tools to maintain a centralized repository of all approved requirements, related artifacts, and supporting documentation.

The repository serves as the authoritative source for requirements management and supports:

- Business, functional, technical, interface, and reporting requirements
- User stories and use cases
- Business rules
- Process flows and workflow documentation
- Data requirements and data mappings
- Design specifications
- Test cases and test results
- Change requests and approvals
- Traceability and audit history

Each requirement receives a unique identifier and version history, allowing stakeholders to track requirement evolution throughout the project lifecycle. Role-based access controls provide appropriate visibility while protecting the integrity of approved requirements.

A comprehensive Requirements Traceability Matrix (RTM) is maintained that establishes bidirectional traceability between requirements, design artifacts, configuration activities, development activities, testing activities, training materials, and implementation deliverables. This enables DHHS and Conduent project teams to verify that every approved requirement receives appropriate design consideration, testing coverage, and implementation validation. The RTM also supports CMS certification activities, quality assurance reviews, audits, and project governance functions.

Formal governance controls support ongoing requirements management throughout the project. Proposed requirement changes follow a documented change control process that evaluates business impacts, technical impacts, schedule implications, risks, dependencies, and resource considerations before approval. All approved changes are incorporated into the requirements repository, traceability matrix, project plans, and associated solution documentation to maintain complete alignment across project work products.

Supporting documentation is produced and maintained throughout the requirements lifecycle, including:

- Requirements Management Plan
- Business Requirements Documents (BRDs)
- Functional Requirements Specifications (FRSs)
- Business Rules Catalogs
- Use Cases and User Stories
- Process Flow and BPMN Diagrams
- Interface Requirements Documents (IRDs)
- Requirements Traceability Matrix (RTM)
- Change Request Documentation
- Requirements Validation and Approval Records

By leveraging proven requirements management practices, industry-standard tools, robust governance controls, and comprehensive documentation, we provide DHHS with a disciplined and transparent approach to eliciting, documenting, managing, and maintaining MDR solution requirements throughout the life of the project and ongoing operations. This approach reduces implementation risk, strengthens stakeholder alignment, improves solution quality, and provides complete traceability from requirement definition through solution delivery.

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| **PMI-16** | Vendor must provide all mutually agreed upon implementation work products and deliverables identified in the Project Work Plan (PWP) to DHHS staff for review and approval and follow the agreed upon deliverable review process. Work products and deliverables include requirements, design, development, testing, pre-implementation (e.g. training, data conversion, etc.), go live, and post-implementation. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

A disciplined project management and deliverable governance approach is employed that provides DHHS with complete visibility into project progress, work products, and decision-making throughout the Medicaid Drug Rebate (MDR) System implementation lifecycle. Our methodology emphasizes collaboration, accountability, quality management, and formal approval processes to support successful project delivery and regulatory compliance.

At project initiation, we collaborate with DHHS to develop and maintain a comprehensive **Project Work Plan (PWP)** that defines activities, milestones, deliverables, dependencies, review periods, approval criteria, and responsible parties. The PWP serves as the governing framework for all project activities and establishes the schedule and process for the submission, review, revision, and approval of implementation work products.

All mutually agreed-upon work products and deliverables identified in the PWP are delivered to DHHS in accordance with approved schedules and deliverable expectations. Each deliverable undergoes internal quality assurance reviews before submission to verify completeness, accuracy, consistency, traceability, and alignment with approved project requirements and standards.

Our deliverable management process supports all phases of the project lifecycle, including:

- Project planning and management
- Requirements elicitation and analysis
- Solution design and architecture
- Configuration and development
- Interface development and integration
- Data conversion and migration
- System, integration, performance, and user acceptance testing
- Training and knowledge transfer
- Operational readiness and implementation planning
- Go-live support
- Post-implementation stabilization and operations support

Deliverables are submitted through a structured Deliverable Review and Approval Process (DRAP) that provides DHHS staff with sufficient time to review, evaluate, comment on, and approve submitted work products. Deliverables include clearly defined objectives, assumptions, dependencies, risks, traceability information, and acceptance criteria, allowing DHHS reviewers to efficiently evaluate deliverable quality and completeness.

The review process follows a consistent lifecycle:

- Develops and submits to DHHS a Deliverable Expectation Document (DED) for each deliverable for review and approval
- Develops and quality-reviews the deliverable
- Submits the deliverable to DHHS in accordance with the approved PWP
- DHHS conducts its review and documents comments, questions, and requested revisions
- Reviews and addresses all DHHS feedback
- Updates and resubmits the deliverable, as necessary
- DHHS provides final approval or acceptance

Conduent baselines approved deliverables and maintains version-controlled copies within the project repository.

This approach promotes transparency, supports stakeholder engagement, and provides documented evidence of review, approval, and project decisions throughout the implementation lifecycle.

A centralized project repository is maintained that stores all project work products, deliverables, approval records, meeting materials, requirements documentation, design artifacts, test results, training materials, conversion documentation, implementation plans, and operational deliverables. Version control and document management practices provide a complete history of revisions, approvals, and baseline changes, enabling efficient project governance and audit readiness.

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| **PMI-17** | Vendor must develop and maintain a Test Management Plan that minimally includes roles and responsibilities, planning and execution activities, testing methodology and approach, progress reporting, defect management, and testing tool(s). The Test Management Plan must include the testing phases (e.g. unit, system, integration, performance, user acceptance, end-to-end testing) and activities required for each environment and interface. The Test Management Plan must align with the CMS Testing Framework. Vendor must deliver the draft Test Management Plan to DHHS thirty (30) calendar days prior to the start of testing activities and update as necessary during implementation. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Test Management Plan

A comprehensive, CMS-aligned testing methodology is applied that validates system functionality, integrations, performance, security, data integrity, and business readiness throughout the MDR System implementation lifecycle. Our testing approach combines structured planning, formal governance, traceability, defect management, and rigorous quality assurance processes to support successful implementation and operational readiness.

A comprehensive Test Management Plan (TMP) is developed that governs all testing activities associated with the MDR System implementation. The draft Test Management Plan is delivered to DHHS no fewer than thirty (30) calendar days prior to the commencement of testing activities. The Plan is also maintained throughout implementation to reflect project changes, approved scope modifications, lessons learned, and evolving testing requirements.

The Test Management Plan aligns with the Centers for Medicare & Medicaid Services (CMS) Testing Framework and incorporates industry best practices for test planning, execution, monitoring, reporting, defect management, and quality control. The TMP serves as the authoritative testing governance document and establishes a consistent and repeatable framework for validating all solution components, interfaces, business processes, and operational workflows.

At a minimum, the Test Management Plan addresses:

- Testing governance structure
- Roles and responsibilities
- Testing scope and objectives
- Testing methodology and approach
- Entry and exit criteria
- Test environments
- Test data management
- Interface testing requirements
- Defect management processes
- Issue escalation procedures
- Progress monitoring and reporting
- Testing tools and technologies
- Requirements traceability
- Acceptance and approval processes

Dedicated testing leadership and quality management resources are assigned that are responsible for planning, coordinating, monitoring, and reporting testing activities. Clearly defined roles and responsibilities establish accountability across Conduent, DHHS, implementation partners, interface partners, and stakeholder groups. Testing governance activities include status reviews, defect triage sessions, readiness assessments, risk reviews, and executive reporting. The Test Management Plan defines a comprehensive testing lifecycle that includes all required testing phases and corresponding validation activities for each system environment, module, interface, and business process.

Testing phases include:

**Unit Testing.** Validate individual system components, configurations, business rules, calculations, reports, workflows, interfaces, and custom functionality to verify that each element performs according to approved design specifications and requirements.

**System Testing.** Validate complete system functionality within the integrated application environment, including business processes, workflow execution, security controls, correspondence generation, reporting, audit functionality, and user interface behavior.

**System Integration Testing (SIT).** Conduct end-to-end testing of all system interfaces and data exchanges with CMS, DHHS, MMIS, financial systems, data warehouses, drug reference sources, and other external systems. Integration testing verifies accurate data transmission, processing, validation, exception handling, and reconciliation activities.

**End-to-End Business Process Testing.** Validate complete operational workflows using realistic business scenarios that reflect actual MDR business operations. Testing scenarios encompass invoice processing, dispute management, collections, accounting activities, rebate calculations, reporting, and federal reporting requirements.

**Performance and Volume Testing.** Evaluate system performance under expected and peak transaction volumes to validate processing efficiency, scalability, throughput, response times, batch processing performance, and system stability.

**User Acceptance Testing (UAT).** Support DHHS-led User Acceptance Testing by preparing test environments, test data, test scripts, traceability documentation, training materials, and issue management support. UAT validates that the implemented solution supports Nebraska's business objectives, operational requirements, and user expectations.

**Regression Testing.** Execute regression testing following defect corrections, configuration changes, or deployments to confirm existing functionality continues to operate as designed.

**Operational Readiness Testing.** Validate production readiness activities, including operational procedures, system administration processes, monitoring capabilities, security controls, disaster recovery procedures, business continuity, security testing, and support processes.

The Test Management Plan identifies testing activities required within each project environment, including development, testing, training, staging, and production readiness environments. Environment-specific entry criteria, configuration requirements, data preparation activities, and validation procedures support consistent testing outcomes across all testing phases.

A complete traceability between business requirements, functional requirements, design specifications, test scenarios, test cases, defects, and testing results are maintained through a Requirements Traceability Matrix (RTM). This confirms that each approved requirement receives appropriate testing coverage and validation.

Defect management activities follow a structured lifecycle that includes identification, logging, classification, prioritization, assignment, remediation, retesting, validation, and closure. Enterprise testing and defect management tools are used to track testing progress, monitor defect trends, manage testing artifacts, and support reporting activities throughout implementation. Defect status, severity levels, aging metrics, resolution trends, and testing progress remain visible through regular project governance and status reporting processes.

The Test Management Plan also establishes comprehensive test reporting processes. We provide routine reporting that includes:

- Test execution status
- Test case completion metrics
- Requirements coverage metrics
- Defect summaries and trends
- Environment readiness status
- Testing risks and issues
- Interface testing results
- Performance testing results
- UAT readiness and completion status
- Overall testing health indicators

These reports provide DHHS with actionable insight into testing progress, solution quality, risk exposure, and implementation readiness.

Throughout implementation, we review and update the Test Management Plan as needed to reflect approved project changes, testing results, environmental changes, interface modifications, and lessons learned. Version-controlled documentation and formal review processes provide DHHS with continued visibility into testing activities and project quality management efforts.

By combining a CMS-aligned testing framework, structured governance, comprehensive testing phases, rigorous defect management, complete requirements traceability, and proactive reporting, Conduent delivers a disciplined testing program that validates the MDR solution across all environments, interfaces, and business processes while supporting successful implementation and operational readiness for DHHS.

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| **PMI-18** | Vendor must develop and maintain an Integration Plan that details the milestones, tasks, schedule, and dependencies for establishing interfaces with the Vendor's solution. Vendor must deliver the draft Integration Plan to DHHS within thirty (30) calendar days following DHHS approval of requirements and design and update as necessary during implementation. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

Following DHHS approval of requirements and design, Conduent develops and submits a draft Integration Plan within thirty (30) calendar days. The Integration Plan serves as the governing document for all interface-related activities and establishes the roadmap for interface design, development, testing, deployment, and operational readiness. The Integration Plan is maintained throughout implementation and updates it as necessary to reflect approved project changes, new dependencies, interface modifications, risk mitigation activities, and implementation progress.

The Integration Plan provides a comprehensive view of the integration landscape and documents all activities required to establish, validate, and support interfaces between the MDR solution and participating systems. The plan includes detailed milestones, schedules, dependencies, resource assignments, governance activities, and implementation timelines for each interface and integration component. As part of the Integration Plan, we develop and maintain an Interface Control Document (ICD) for each interface. The ICD serves as the authoritative source for interface specifications and documents interface objectives, source and target systems, data elements, file layouts, message structures, transmission methods, security requirements, validation rules, schedules, error handling procedures, data ownership, testing requirements, and operational support processes. The ICDs are used to establish a shared understanding among DHHS, Conduent, and external trading partners and to manage interface changes through the approved change management process. Consistent with Nebraska's current MDR environment, we work with the systems and trading partners supporting fee-for-service claims, managed care encounter data, rebate reference data, CMS rebate data, and all inbound and outbound files required for MDR operations.

At a minimum, the Integration Plan addresses:

- Interface inventory and scope
- Integration objectives and requirements
- Milestones and deliverables
- Tasks and implementation activities
- Resource assignments and responsibilities
- Dependency identification and management
- Interface development schedules
- Environment requirements
- Data exchange specifications
- Security requirements
- Testing and validation activities
- Risk and issue management
- Cutover and deployment activities
- Operational readiness activities
- Ongoing monitoring and support processes

Conduent coordinates interface design sessions, reviews file specifications, confirms data mapping requirements, conducts end-to-end testing, resolves interface issues, and documents results within the ICDs and Integration Plan. Each interface receives a detailed implementation profile describing business purpose, source and destination systems, data elements, interface protocols, transmission schedules, security controls, error handling requirements, reconciliation procedures, and ownership responsibilities.

The Integration Plan establishes a detailed implementation schedule containing key milestones and dependencies associated with each interface lifecycle phase, including:

**Interface Requirements and Analysis.** Validate business, technical, operational, security, and reporting requirements associated with each interface and confirms alignment with approved solution requirements and design specifications.

**Interface Design.** Develop and document interface specifications, data mappings, business rules, file layouts, API specifications, transmission protocols, validation requirements, reconciliation procedures, and exception handling processes.

**Interface Development and Configuration.** Configure, develop, and prepare interface components according to approved specifications, data standards, and security requirements.

**Interface Testing.** Plan and execute comprehensive interface testing activities, including:

- Unit testing
- Interface testing
- System integration testing
- End-to-end testing
- Data validation testing
- Error handling testing
- Performance testing
- User acceptance testing support

Testing activities validate data integrity, transmission accuracy, workflow execution, exception processing, and operational readiness across all integrated environments.

## Deployment and Operational Readiness

Interface migration activities, cutover planning, production readiness reviews, deployment support, and post-implementation validation activities are coordinated to promote a smooth transition into production operations.

The Integration Plan explicitly identifies project dependencies that may affect schedule, implementation sequencing, testing readiness, third-party coordination, data availability, infrastructure readiness, security approvals, or external partner participation. These dependencies are actively tracked and risk mitigation strategies to minimize implementation delays and support informed decision-making are incorporated.

To support governance and oversight, a centralized integration inventory is maintained. A status tracking process provides DHHS with visibility into interface progress, readiness, risks, issues, testing status, deployment milestones, and operational dependencies. Regular project status reports and governance meetings include integration-specific metrics and progress updates.

The Integration Plan also documents interface-related risks and contingency strategies, including:

- External system dependencies
- Data quality concerns
- Vendor coordination risks
- Infrastructure readiness risks
- Security and compliance considerations
- Testing constraints
- Schedule impacts
- Deployment risks

For each identified risk, defines mitigation activities, escalation paths, ownership assignments, and monitoring procedures are defined.

Throughout implementation, a version-controlled integration documentation is maintained, including:

- Integration Plan
- Interface Inventory
- Interface Control Documents (ICDs)
- Data Mapping Specifications
- Data Exchange Specifications
- File Layout Documentation
- API Specifications
- Interface Testing Documentation
- Reconciliation Procedures
- Deployment and Cutover Plans
- Interface Operational Support Documentation

This documentation provides complete visibility into the integration architecture and supports ongoing operations, maintenance, knowledge transfer, troubleshooting, audit activities, and future system enhancements.

By combining proven integration management practices, comprehensive planning, detailed dependency management, rigorous testing, and proactive governance, we provide DHHS with a structured and transparent Integration Plan that supports successful interface implementation, minimizes project risk, and promotes seamless interoperability between the MDR solution and all required internal and external systems. Following implementation, Conduent maintains the Integration Plan and associated ICDs as living documents, updating them to reflect approved modifications, interface enhancements, maintenance activities, and operational changes throughout the life of the contract.

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| **PMI-19** | Vendor must develop and maintain Automated Testing Scripts that can be executed when modifications and configuration changes are made to the Solution. Vendor must conduct regression testing on modification and configuration changes. Vendor must execute prior to Go Live to demonstrate successful execution of scripts, and during operations. Vendor will review and update Automated Testing Scripts, as necessary. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

A mature automated testing strategy is employed that supports continuous quality assurance, rapid validation of system changes, and long-term operational stability for the Medicaid Drug Rebate (MDR) System. Our approach combines automated testing, regression testing, requirements traceability, and structured release management practices to validate modifications, configuration changes, enhancements, defect corrections, and system updates throughout implementation and ongoing operations.

As part of the implementation lifecycle, Conduent develops, maintains, and executes a comprehensive suite of Automated Testing Scripts designed to validate critical system functionality, business processes, interfaces, calculations, workflows, security controls, and reporting functions. The automated testing framework supports repeatable, consistent, and efficient validation activities whenever modifications or configuration changes occur within the MDR solution.

Automated Testing Scripts are created using industry-standard testing tools and methodologies and are aligned with approved business requirements, functional specifications, design documentation, and test scenarios. Each automated script is traceable to specific system functions and business requirements, providing measurable validation of solution performance and operational readiness.

The automated testing framework supports validation of key MDR business functions, including:

- Drug rebate invoice generation
- Rebate calculation processing
- Prior quarter adjustment processing
- Manufacturer payment processing
- Dispute management workflows
- Accounts receivable and accounting activities
- CMS file processing
- Claims utilization processing
- Interface transactions and data exchanges
- Reporting and analytics functions
- User security and role-based access controls
- Workflow and notification processing
- Audit trail and historical data management
- System configuration and business rule execution

Formal regression testing is conducted whenever modifications, defect corrections, enhancements, releases, patches, upgrades, or configuration changes are introduced into the solution. Regression testing confirms that new changes perform as intended and that existing functionality continues to operate correctly without unintended impacts to related business processes or system components.

Our regression testing approach incorporates both automated and manual testing methodologies, with automated testing serving as the primary mechanism for validating high-volume, repeatable business processes and core system functionality. Automated execution significantly reduces testing effort, improves consistency, accelerates release validation activities, and increases overall solution quality.

The regression testing lifecycle includes:

**Change Impact Analysis.** Proposed modifications and configuration changes are evaluated to identify affected business functions, interfaces, workflows, reports, security components, and testing requirements. This analysis determines the scope of automated and manual regression activities required for each change.

**Automated Test Execution.** Automated Testing Scripts execute against affected and dependent functionality to validate application behavior, system calculations, workflow processing, interface operations, and business rule execution.

**Defect Identification and Resolution.** Testing results are reviewed to identify defects, performance issues, integration concerns, or unexpected outcomes. Defects are documented, prioritized, remediated, retested, and validated through established defect management procedures.

**Regression Certification.** Regression testing results are reviewed and approved prior to deployment into subsequent environments or production release activities. Testing outcomes become part of the release readiness assessment process.

Prior to Go Live, the complete suite of Automated Testing Scripts is executed to demonstrate successful operation of system functionality, business processes, interfaces, and critical workflows. Test execution results are documented and shared with DHHS as part of overall implementation readiness activities. Automated testing results complement system testing, integration testing, end-to-end testing, performance testing, and user acceptance testing activities to provide comprehensive validation of the MDR solution before production deployment.

Automated Testing Scripts are maintained as living project artifacts throughout implementation and operations. As new functionality is introduced, business rules evolve, interfaces are modified, or regulatory requirements change, Conduent reviews, updates, and expands the automated testing library to maintain appropriate testing coverage and alignment with current system functionality.

The ongoing maintenance process includes:

- Review of script effectiveness and coverage
- Updates for modified workflows and business processes
- Addition of tests for new functionality
- Enhancement of existing automated test scenarios
- Retirement of obsolete scripts
- Validation of script accuracy and performance
- Alignment with approved requirements and system configurations

During operations, Automated Testing Scripts are incorporated into routine release management and maintenance activities. Automated regression testing supports system upgrades, configuration changes, defect resolutions, security updates, and enhancement deployments, providing ongoing assurance that operational changes do not adversely impact system functionality or business operations.

Complete documentation is maintained, supporting automated testing activities, including:

- Automated Test Script Inventory
- Requirements Traceability Matrix
- Regression Test Plans
- Test Execution Results
- Defect Reports
- Release Readiness Documentation
- Change Impact Assessments

This documentation provides transparency into testing activities, supports audit and compliance requirements, and enables effective knowledge transfer throughout the contract lifecycle. By combining comprehensive automated testing, structured regression testing practices, continuous test maintenance, and rigorous release validation processes, DHHS is provided a proven quality assurance framework that reduces implementation risk, accelerates change validation, improves system reliability, and supports successful operations throughout the life of the MDR solution.

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| **PMI-20** | Vendor must utilize, maintain, and facilitate a Change Control Process and supporting documentation (e.g. change request form, change log) to manage changes throughout implementation. Jira is an acceptable tool. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

A formal, industry-standard Change Control Process is used to identify, evaluate, approve, document, implement, and monitor changes throughout the Medicaid Drug Rebate (MDR) System implementation lifecycle. Our approach provides a governance framework that promotes transparency, accountability, traceability, and informed decision-making while minimizing project risk and maintaining alignment with approved scope, schedule, budget, and project objectives.

A centralized change management repository is established and maintained that serves as the authoritative source for all project change activities. The process incorporates standardized documentation, formal review procedures, impact assessments, approval workflows, audit history, and reporting capabilities to support effective project governance and stakeholder oversight.

To facilitate change management activities, an enterprise change management and issue-tracking tool is used, Azure DevOps, which the State has identified as an acceptable solution. DevOps supports end-to-end change lifecycle management, workflow automation, approval routing, status tracking, reporting, auditability, and historical record retention.

The platform provides authorized DHHS and project stakeholders with visibility into submitted changes, assessment activities, approval status, implementation progress, and change outcomes.

The Change Control Process governs all proposed changes that may affect project scope, requirements, design, interfaces, configurations, development activities, testing activities, schedules, deliverables, integrations, operational processes, or project resources.

The process includes the following key activities:

## Change Request Submission

Authorized project stakeholders submit change requests using a standardized Change Request Form. Each request includes a unique identifier and captures sufficient information to support evaluation and decision-making, including:

- Change description
- Business justification
- Requested implementation timeframe
- Affected business processes
- Associated requirements or deliverables
- Requestor information
- Priority and urgency indicators
- Assumptions and dependencies

## Impact Analysis

An impact analysis assesses each proposed change to determine potential impacts on:

- Business requirements
- Project scope
- Schedule and milestones
- Testing activities
- Interfaces and integrations
- Project resources
- Operational processes
- Risks and dependencies
- Training and documentation

The impact analysis provides DHHS and project governance teams with the information necessary to evaluate the overall implications of the proposed change.

## Change Review and Approval

Formal review sessions are facilitated with DHHS and designated governance bodies, including project leadership and change control stakeholders. Based on the impact assessment, changes may be:

- Approved
- Approved with conditions
- Deferred
- Rejected
- Returned for additional analysis

All decisions, comments, approvals, and action items are documented and maintained within the change management repository.

## Change Implementation

Following approval, the change is incorporated into the appropriate project work products, requirements documentation, design specifications, project schedules, test plans, implementation plans, and related artifacts. Approved changes are tracked through completion and verified through established quality assurance and testing processes.

## Validation and Closure

Conduent validates successful implementation of approved changes and documents completion status, testing results, approvals, and closure activities. Closed changes remain available for future reference, audit activities, and project reporting.

To support governance and auditability, comprehensive supporting documentation is maintained throughout implementation, including:

- Change Management Plan
- Change Request Forms
- Change Log
- Impact Assessments
- Approval Records
- Decision Registers
- Change Status Reports
- Audit History Documentation

The Change Log provides a complete historical record of all submitted and approved changes and includes:

- Change request identifier
- Submission date
- Requestor
- Change description
- Priority level
- Status
- Approval dates
- Implementation dates
- Resolution details
- Associated project artifacts

Routine reporting on change management activities are provided through project status reports, governance meetings, and executive reviews. Reporting includes change volume, approval trends, implementation status, aging metrics, priority assessments, and potential impacts to project objectives. This transparency allows DHHS to proactively monitor project changes and make informed decisions throughout implementation.

By leveraging a proven Change Control Process, standardized documentation, formal governance procedures, and enterprise tools such as Azure DevOps, DHHS is provided with a disciplined and transparent approach to managing project changes. This approach maintains alignment with project objectives, reduces implementation risk, provides complete traceability, and supports successful delivery of the MDR solution throughout the implementation lifecycle.

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| **PMI-21** | Vendor must develop and execute a Data/File Conversion and Migration Plan for migrating the DHHS existing application data to the Solution. The plan must minimally include roles and responsibilities, planning and execution activities, data migration and validation approach, and reporting. Vendor must deliver the draft Data/File Conversion and Migration Plan to DHHS sixty (60) calendar days prior to the start of Conversion and Migration activities and update as necessary during implementation. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Data/File Conversion and Migration Plan

A comprehensive Data/File Conversion and Migration Plan is developed and executed to support the accurate, secure, and efficient migration of DHHS historical and active Medicaid Drug Rebate (MDR) data into the Conduent MDR solution. Our proven conversion methodology minimizes operational disruption, preserves data integrity, and provides DHHS with complete visibility into conversion readiness, execution activities, validation results, and migration outcomes.

A draft Data/File Conversion and Migration Plan is delivered to DHHS no fewer than sixty (60) calendar days prior to the commencement of conversion and migration activities. The plan serves as the governing document for all conversion-related activities and remains under formal version control throughout implementation. We review and update the plan as necessary to reflect approved project changes, data discoveries, conversion findings, testing results, and implementation requirements.

The Data/File Conversion and Migration Plan establish the framework for planning, extracting, transforming, validating, loading, reconciling, and certifying data migration activities. At a minimum, the plan addresses:

- Conversion scope and objectives
- Source and target data inventories
- Roles and responsibilities
- Conversion schedules and milestones
- Conversion testing activities
- Data validation and reconciliation processes
- Risk management procedures
- Reporting requirements

- Data extraction activities
- Data profiling and cleansing activities
- Data mapping specifications
- Transformation rules
- Cutover activities
- Production migration activities
- Post-conversion support and validation

Our methodology incorporates multiple mock conversion cycles, validation checkpoints, and readiness reviews to identify and resolve issues proactively before production deployment.

## Roles and Responsibilities

A conversion management team is established that is responsible for planning, coordinating, executing, validating, and monitoring all migration activities. Clearly defined roles and responsibilities promote accountability and support efficient collaboration between Conduent, DHHS, and external stakeholders.

Key Conduent conversion resources include:

- Project Manager
- Conversion Specialists
- Business Analysts
- Configuration Specialists
- Technical Resources
- Security Team
- Testing Team
- Operations Team
- Rebate Operations Specialists
- CMS Certification Specialists

The Project Manager serves as the primary point of accountability for conversion planning, execution, issue management, status reporting, and stakeholder coordination.

DHHS stakeholders participate in:

- Source data review and clarification
- Data mapping validation
- Business rule confirmation
- Conversion testing
- Reconciliation activities
- Conversion readiness reviews
- Final migration approval activities

Recurring conversion working sessions, validation reviews, and governance discussions are facilitated to maintain alignment throughout the conversion lifecycle.

## Planning and Execution Activities

A structured, phased conversion methodology designed is followed to reduce risk and improve migration accuracy.

Planning and execution activities include:

**Data Assessment and Discovery.** Perform a detailed assessment of source systems, file structures, data quality characteristics, business rules, historical records, interfaces, and reporting requirements. Data profiling activities identify anomalies, gaps, duplicates, and cleansing opportunities before migration begins.

**Data Mapping and Transformation Design.** Develop detailed data mapping documentation that defines source-to-target relationships, field-level mappings, transformation rules, conversion logic, defaults, crosswalks, and validation requirements. All mappings are reviewed with DHHS for confirmation prior to implementation.

**Conversion Development.** Develop automated conversion routines, migration scripts, transformation processes, and load procedures using repeatable and auditable methodologies. Conversion components support consistent execution across testing and production environments.

**Mock Conversions.** Conduct multiple mock conversion cycles to validate extraction, transformation, loading, reconciliation, and reporting processes. Lessons learned from each cycle drive process refinement and improve production conversion readiness.

**Production Migration Planning.** The plan includes detailed cutover procedures, migration timelines, resource assignments, contingency plans, rollback procedures, and production readiness checkpoints to support successful deployment.

**Final Production Conversion.** Executes the approved production migration according to the established migration schedule, validating successful completion through reconciliation and acceptance activities.

## Data Migration and Validation Approach

A rigorous validation and reconciliation processes are employed to verify migrated data is complete, accurate, and fully usable within the MDR solution.

The migration and validation approach includes:

**Data Quality Validation.** Data profiling tools and validation procedures are used to assess:

- Completeness
- Accuracy
- Consistency
- Referential integrity
- Data format compliance
- Duplicate records
- Missing values
- Business rule compliance

**Conversion Testing.** Conversion testing validates the successful migration of:

- Drug rebate invoices
- Manufacturer information
- Labeler information
- NDC reference data
- Claims utilization data
- Dispute records
- Accounts receivable data
- Payment records
- Audit history
- Historical reporting data
- Configuration and reference tables

**Reconciliation Activities.** Comprehensive reconciliation activities are performed, comparing source and target systems to validate:

- Record counts
- Financial totals
- Invoice balances
- Payment amounts
- Historical transaction records
- Key business metrics

Any variances identified during reconciliation are documented, investigated, resolved, and retested before migration acceptance.

**Business Validation.** DHHS stakeholders participate in business validation activities to confirm that migrated data supports operational processes, reporting requirements, audit needs, and user expectations. Business validation provides an additional assurance layer beyond technical reconciliation activities.

**Conversion Certification.** Following successful testing, reconciliation, and business validation, Conduent prepares conversion readiness documentation and migration certification materials supporting DHHS approval for production deployment.

## Reporting

Complete transparency is maintained throughout conversion activities through formal reporting and governance processes.

Conversion reporting includes:

- Conversion project status reports
- Data quality assessment reports
- Mapping completion reports
- Mock conversion results
- Reconciliation reports
- Conversion readiness assessments
- Production migration status reports
- Post-conversion validation reports

Reports include key metrics such as:

- Records converted
- Records excluded
- Data quality findings
- Validation results
- Reconciliation outcomes
- Outstanding issues
- Conversion progress against schedule
- Risk status and mitigation activities

Conduent reviews conversion status and results during regular project governance meetings, providing DHHS with continuous visibility into migration readiness and execution progress.

By leveraging proven conversion methodologies, rigorous validation procedures, multiple mock migration cycles, detailed reporting, and collaborative governance processes, Conduent delivers a comprehensive Data/File Conversion and Migration Plan that supports the successful migration of DHHS MDR data while minimizing risk, preserving data integrity, and promoting operational readiness at Go Live.

| | |
|---|---|
| **PMI-22** | Vendor must utilize, maintain, and facilitate a Performance Standard Management Process and documentation to monitor, manage, and report on the Vendor's adherence to the contract performance standards. Vendor must deliver the draft Performance Standard Management Process and Report to DHHS within thirty (30) calendar days of contract signing. Vendor must submit the Performance Standard Management Report to DHHS monthly during the DDI and M&O phases of the Contract. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Performance Standard Management Process

Effective performance management extends beyond contractual compliance. It provides DHHS with meaningful operational transparency, measurable accountability, and actionable insights that support informed decision-making throughout the life of the MDR contract.

Within thirty (30) calendar days of contract signing, we deliver a draft Performance Standard Management Process and associated Performance Standard Management Report for DHHS review and approval. The process establishes the governance framework, methodologies, tools, reporting mechanisms, and accountability structures used to monitor, manage, and report contract performance during both the DDI and M&O phases.

A structured performance management methodology is used that aligns contractual performance standards with operational activities, service delivery outcomes, quality management practices, and continuous improvement initiatives. The process provides real-time visibility into performance results and supports proactive identification and resolution of performance risks before they affect program operations.

The **Performance Standard Management Process** governs the measurement and reporting of all contractual service levels, operational metrics, key performance indicators (KPIs), deliverables, and performance standards established by DHHS and the contract.

At a minimum, the process addresses:

- Performance metric definitions
- Data collection methodologies
- Calculation and measurement standards
- Monitoring activities
- Escalation procedures
- Corrective action processes
- Root cause analysis procedures
- Reporting requirements
- Continuous improvement activities
- Governance and review processes
- Performance documentation retention

## Performance Monitoring and Management

An ongoing performance monitoring framework is employed that continuously evaluates compliance with contractual obligations and established service levels. Performance data is gathered through automated system monitoring tools, operational dashboards, workflow analytics, service management platforms, project management tools, testing repositories, and operational support processes. This integrated approach provides accurate and timely measurement of performance across all operational areas.

Conduent monitors key contract performance categories that may include:

- Project milestone achievement
- Deliverable timeliness
- System availability and uptime
- Interface processing performance
- Batch processing performance
- Incident and problem management performance
- Defect resolution performance
- Service desk responsiveness
- Data processing accuracy
- Reporting timeliness
- Security and compliance metrics
- Customer support performance
- Production support activities

Performance thresholds, targets, warning levels, and escalation criteria are documented and maintained as part of the performance management framework. When performance measurements indicate potential noncompliance or emerging operational concerns, proactive management activities are initiated that are designed to mitigate risk and restore performance before service disruption occurs.

## Performance Governance and Continuous Improvement

Performance management is incorporated into the overall project and operational governance framework. Performance results are reviewed through recurring governance meetings, operational reviews, executive oversight sessions, and performance management forums. These reviews provide opportunities to evaluate trends, identify risks, discuss improvement opportunities, and confirm alignment with DHHS priorities.

For any metric that falls below established performance targets, Conduent conducts formal root cause analysis to identify contributing factors and develop corrective action plans. Corrective action activities include:

- Identification of underlying causes
- Impact analysis
- Risk assessment
- Remediation planning
- Assignment of accountable owners
- Target completion dates
- Validation of corrective actions
- Continued monitoring until resolution

This disciplined approach supports continuous service improvement and strengthens overall program performance over the life of the contract. As operational maturity increases, performance data is leveraged to identify efficiencies, process improvements, automation opportunities, and best practices that further enhance service delivery outcomes for DHHS.

## Performance Standard Management Documentation

Conduent maintains comprehensive documentation supporting all aspects of performance management and contractual compliance.

Artifacts maintained throughout the contract lifecycle include:

- Performance Standard Management Plan
- Performance Metric Catalog
- Key Performance Indicator Definitions
- Service Level Documentation
- Measurement Methodologies
- Performance Dashboards
- Root Cause Analysis Reports
- Corrective Action Plans
- Performance Standard Management Reports
- Monthly Performance Reviews
- Historical Trend Analyses
- Governance Meeting Minutes

Version-controlled documentation provides transparency, auditability, and historical performance visibility for DHHS.

## Performance Standard Management Reports

A Performance Standard Management Report is submitted to DHHS on a monthly basis throughout both the DDI and M&O phases of the contract. The report serves as a comprehensive performance management tool that provides both current-state visibility and trend-based analysis. Rather than simply reporting whether a metric passed or failed, the report provides meaningful operational insight that supports program oversight and contract management.

Monthly reporting includes:

- Performance results for each contractual standard
- Service level attainment status
- KPI measurements and trend analysis
- Historical performance comparisons
- Risks and emerging concerns
- Open corrective action plans
- Root cause analysis results
- Issue escalation status
- Continuous improvement initiatives
- Upcoming performance impacts or dependencies

Performance reporting includes graphical dashboards, trend analyses, scorecards, and narrative summaries that allow DHHS leadership and operational staff to quickly assess program health and performance. Where performance exceeds expectations, successful outcomes and best practices are highlighted. Where performance challenges occur, transparent reporting, detailed root cause analysis, and actionable remediation plans are provided that are designed to restore and sustain compliance.

## Commitment to Accountability and Transparency

Conduent's Performance Standard Management Process transforms contractual performance monitoring into a proactive management discipline that drives operational excellence, accountability, and continuous improvement. Through structured governance, automated monitoring, comprehensive documentation, and transparent monthly reporting, DHHS is provided with complete visibility into contract performance while fostering a culture of performance ownership and continuous service enhancement throughout both implementation and operations.

| | |
|---|---|
| **PMI-23** | Solution must support data integrity through system controls for software program changes and promotion to production. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

Data integrity is protected through a structured Software Development Lifecycle (SDLC), formal change management procedures, and controlled release management practices. All software modifications, enhancements, defect corrections, and configuration changes follow a documented review, approval, testing, and deployment process before implementation. Each change is tracked through a centralized repository with complete traceability, impact analysis, approval history, and audit documentation, providing accountability and transparency throughout the solution lifecycle.

The CMdS MDR solution maintains strict separation between development, testing, staging, training, and production environments. Role-based security controls govern access to each environment, and only authorized personnel can approve and promote changes through the release process. Prior to production deployment, all modifications undergo comprehensive testing, including regression, integration, and end-to-end testing, to verify that existing functionality, business rules, interfaces, and data remain accurate and unaffected by the change.

Data integrity is further safeguarded through configuration management, version control, automated validation processes, and comprehensive audit logging. All application components, configuration settings, and deployment packages are maintained in controlled repositories with full version histories and rollback capabilities. Post-deployment validation and ongoing monitoring confirm successful implementation and continued system stability, while detailed audit trails provide DHHS with the ability to review changes, approvals, user activities, and deployment events to support compliance, operational oversight, and audit requirements.

| | |
|---|---|
| **PMI-24** | Vendor must conduct an Implementation Assessment that includes an analysis of DHHS's existing solution and operational processes and must provide a detailed plan for transitioning data and operations, including process changes, to the Vendor's solution. The Transition Plan must track DHHS state of readiness to transition to the Vendor's solution and operational processes. Vendor must provide the Implementation Assessment within thirty (30) calendar days of the implementation start date and provide the Pre-Operational Transition Plan within sixty (60) calendar days of the implementation start date. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Describe Bidder's approach/ability to meet the requirement] |

## Implementation Assessment

A successful MDR implementation requires more than system deployment. It requires a thorough understanding of DHHS's current operational environment, business processes, data assets, reporting requirements, interfaces, staffing responsibilities, and program objectives. Within thirty (30) calendar days of the implementation start date, a comprehensive Implementation Assessment is delivered that evaluates the State's current solution, operational workflows, supporting technologies, business rules, data sources, organizational dependencies, and operational practices. The assessment identifies opportunities to streamline operations, reduce manual effort, improve data quality, strengthen controls, and align business processes with the capabilities of the CMdS MDR solution.

The Implementation Assessment includes detailed analyses of existing rebate invoicing processes, dispute management activities, financial reconciliation procedures, data exchanges, reporting functions, compliance activities, operational pain points, risks, dependencies, and staffing responsibilities. Conduent collaborates closely with DHHS stakeholders through discovery sessions, workshops, interviews, document reviews, and process analysis activities to validate current-state operations and establish a complete understanding of future-state business objectives. The assessment serves as the foundation for implementation planning, solution configuration, conversion activities, testing, training, operational readiness, and transition planning.

## Transition Plan

Within sixty (60) calendar days of the implementation start date, a comprehensive Pre-Operational Transition Plan is delivered that defines the activities, milestones, responsibilities, dependencies, and readiness criteria required to transition DHHS from its existing environment to the CMdS solution. The Transition Plan provides a detailed roadmap for transitioning data, business operations, users, interfaces, reporting processes, operational procedures, and supporting functions while minimizing disruption to ongoing program operations.

The Transition Plan documents all transition-related activities, including data conversion and migration, interface implementation, business process transformation, training and knowledge transfer, operational procedure development, testing activities, cutover planning, production readiness validation, and post-implementation stabilization support. The plan also identifies required process changes and operational improvements that support adoption of the new solution and promote efficient, compliant MDR operations. The Transition Plan is maintained throughout implementation and updates it as project activities progress, readiness assessments are completed, and operational decisions are finalized.

## Readiness Tracking and Operational Transition

A key component of the Transition Plan is a formal readiness management framework designed to provide DHHS with clear visibility into organizational, operational, technical, and business preparedness for implementation. Conduent establishes measurable readiness criteria and tracks progress across critical transition domains, including data conversion readiness, interface readiness, testing readiness, training readiness, operational readiness, business process readiness, security readiness, and production deployment readiness.

Readiness assessments are conducted throughout implementation and reported through project governance processes, allowing DHHS leadership to evaluate progress, identify risks, address gaps, and make informed go-live decisions. Readiness scorecards, risk assessments, issue tracking, milestone reporting, and operational checklists are used to monitor transition activities and verify successful completion of all prerequisites before production deployment. This structured approach provides DHHS with confidence that personnel, processes, technology, data, and operational procedures are fully prepared to support a successful transition to the CMdS MDR solution and ongoing operations.

**ATTACHMENT B - Technical Requirements**
**RFP# 124528 ON**
**Medicaid Drug Rebate (MDR) System**
**State of Nebraska, Department of Health and Human Services**

**IMPORTANT:**

Please note that any additional cost must be captured only on the Cost Sheet and NOT within the response to the specification.
Failure to adhere to these instructions shall result in the bidder being deemed as "Non-Responsive".

## General Guidelines for Vendors

1. **Thoroughly Review Requirements:** Carefully read each requirement, including subpoints and links provided. Ensure responses clearly address each aspect of the requirement.
2. **Provide Supporting Details:** Each response should include clear descriptions, processes, tools, or diagrams demonstrating how the solution meets the requirement.
3. **Organize Responses:**
    - Use headings and subheadings to structure responses.
    - Include bullet points for clarity.
4. **Use Standards and Best Practices:**
    - Refer to relevant standards (e.g., Section 508, NIST, FIPS, HIPAA).
    - Provide details of certifications, tools, and industry-compliant processes.
5. **Clarity and Precision:**
    - Avoid vague language or ambiguous claims.
    - Use concise, professional terminology.
    - Ensure responses are tailored to DHHS requirements and align with federal and state guidelines.
6. **Supporting Artifacts:**
    - Include visuals such as diagrams, charts, and flowcharts where applicable.
    - Reference external documents or standards as appropriate.
7. **Testing and Validation:** Detail testing approaches, validation processes, and evidence that the solution meets outlined expectations.

## Specific instructions to complete **Technical Requirements**

Bidders are to refrain from providing a solution that would result in additional fees and/or expressing that a feature or functionality is available at an additional cost.

This document contains four tables for each Technical Requirement type. The requirement types are as follows:

| Requirement Type | Range |
|---|---|
| Architecture | ARCH-01 - ARCH-06 |
| Data Management | DM-01 – DM–05 |
| Security, Privacy, and Compliance | SPC-01 – SPC-09 |
| Operations Management | OM-01 – OM-09 |

For each requirement listed under the tables in this document, the bidder shall choose whether their solution "Met the Requirement" then choose the "Implementation Approach" and the "Bidder's Response" by following the instructions provided for each requested information directly below.

Met The Requirements

Within each requirement there is a dropdown option to select from three options to answer whether the bidder will meet the requirement or not. The available options to choose from and their descriptions are as follows.

| Available Options | Description |
|---|---|
| YES | The Bidder confirms that their solution meets the specified requirement |
| NO | The Bidder confirms that their solution does not meet the requirement |
| MET WITH DEVIATION | The Bidder Confirms that their solution meets the specified requirement with deviation taken to the specified requirement.<br>(If this option is selected, then the bidder shall explain within the Bidder's Response section how they plan to meet the requirement. |

Implementation Approach:

The Implementation Approach requested in this document can be described as the methodology that will be utilized by the bidder to meet the specific requirement. Within each requirement there is a dropdown option provided to select your Implementation Approach from which an option must be selected. The available options to choose from and their descriptions are as follows:

| Available Options | Description |
|---|---|
| Out of Box (OOB) | Indicates that the functionality is available in the solution without any modifications. |
| Customization | Refers to changes made to the base product to meet specific requirements. This may involve coding or other significant alterations. |
| Configuration | Refers to adjustments or settings changes within the solution that do not require coding but adapt the product to meet requirements. |
| TPS | Met with third party software |
| NA | Not Available |

Bidder's Response

As bidders prepare responses to each individual requirement, the responses are expected to address the individual requirement in a manner that demonstrates to DHHS that the bidder understands the requirement and how the bidder will meet the specific requirement. If the bidder's response simply repeats the requirement, acknowledges, or adds sales materials in the Bidder's response, DHHS will reserve the right to deem the response as a "Non-Responsive Solicitation Response". However, if needed to appropriately explain bidder's response, a mix of tables, graphical details, and written narrative is acceptable.

The bidder's response to each requirement must include confirmation and a detailed explanation for the Implementation Approach taken. Bidders shall capture any assumptions, risks, or dependencies related to fulfilling each individual requirement.

Provide specifics, such as:

- Tools or methods used.
- Estimated effort for customizations/configurations.

| ARCHITECTURE | |
|---|---|
| **Number** | **Requirement Description** |
| **ARCH-01** | 1. Describe the bidder solution to addressing the following architectural details:<br>a. Technology Architecture: Describe the software components, including third-party software products, open-source libraries, and utilities that complete the platform for running a service or supporting an application. This section should document any technical requirements for accessing the software, including but not limited to client desktop installs, etc. Further, the section should clearly outline any State required infrastructure, such as setting up VPN, SFTP, etc., to implement or operate the system.<br>b. Network Architecture: Describe the means of communication, the method of sending and receiving information, between the assets in the Technology Architecture.<br>c. Application Architecture: Describe how the solution components are assembled and interact to meet the business needs. Describe the solution's ability to manage and store documents and attachments.<br>d. Data Flow Architecture: Describe the data flows into and out of the system boundary, include transmission and storage, along with ports, protocols, and services of all inbound and outbound traffic. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's MDR Solution provides a comprehensive cloud-hosted architecture as a standard out-of-the-box capability. The solution is hosted in Microsoft Azure and leverages microservices-based architecture, secure APIs, web services, and integration components to support claims processing, rebate management, provider services, data analytics, reporting, and portal functionality. The Solution supports secure data transmission, storage, disaster recovery, monitoring, and interoperability with external systems through standard integration mechanisms. Technology, network, application, and data flow architectures are documented as part of the implementation deliverables and support the operational and technical requirements needed to implement and maintain the solution. We provide additional information on the architectural details below.

a. **Technology Architecture.** The MDR Solution is hosted in Microsoft Azure and is delivered as a secure, cloud-based web application. The solution uses Azure-hosted application services, relational databases, reporting services, APIs, integration services, monitoring tools, and security services as standard platform components. Users access the system through supported web browsers without requiring specialized desktop software installations. During implementation, Conduent works with Nebraska to establish required connectivity, including secure VPN, SFTP, APIs, and other approved integration methods needed to support interfaces, file exchanges, and operational processing.

b. **Network Architecture.** The MDR Solution uses secure network communications between users, application services, databases, reporting components, and external systems. Communications are protected through encrypted protocols and controlled network access. Inbound and outbound data exchanges are performed through secure APIs, web services, SFTP processes, and other approved integration mechanisms. Network monitoring, logging, and security controls help support availability, reliability, and secure data transmission.

c. **Application Architecture.** The MDR Solution uses a modular architecture in which application components work together to support rebate invoicing, dispute management, manufacturer communications, payment tracking, reporting, security administration, workflow management, and portal capabilities. Components communicate through secure services and APIs, allowing functionality to be configured and maintained without impacting the overall solution. The solution also supports management and storage of documents and attachments associated with rebate operations, including supporting records, correspondence, and audit documentation.

d. **Data Flow Architecture.** The MDR Solution manages secure data flows between users, interfaces, internal application components, databases, reports, and external systems. Data is transmitted through secure protocols and approved services, including APIs, web services, and file transfer mechanisms. The architecture supports inbound and outbound data exchanges, secure storage of operational and historical information, audit logging, and controlled access to sensitive data. During implementation, Conduent documents the required ports, protocols, services, interface connections, and data flows as part of the architecture and integration deliverables.

| | |
|---|---|
| **ARCH-02** | 1. Describe the bidder solution to address the following:<br>a. Type of Software – SaaS, PaaS or, IaaS<br>b. Licensing Model- Perpetual or Subscription based licenses<br>c. Single or Multi-Tenant architecture |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's MDR Solution is delivered using a Software as a Service (SaaS) model hosted in Microsoft Azure. The solution uses Azure Kubernetes Service (AKS) and cloud-hosted infrastructure to support application hosting, scalability, monitoring, and disaster recovery. The licensing approach is subscription-based. The solution is provided as a hosted service and does not require perpetual software licenses.

The MDR Solution operates in a multi-tenant cloud environment. The architecture supports shared cloud infrastructure while maintaining logical separation of client data and security controls. The solution uses role-based access controls, audit capabilities, and data protection features to support client-specific operations.

| | |
|---|---|
| **ARCH-03** | The bidder solution must be a cloud-based hosted environment with all components and data residing in the United States and consisting of ready-made software products that do not require major modifications but support customization to meet the functional requirements as outlined in Attachment A – MDR Functional Requirements. Bidder must describe how their approach will meet these requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's MDR Solution is a cloud-based, hosted solution operating in Microsoft Azure data centers located within the United States. The solution supports claims processing, rebate management, reporting, analytics, and portal functions through a secure SaaS delivery model. The MDR Solution consists of mature, production-ready software components currently supporting Medicaid pharmacy programs. The solution uses configurable business rules, workflows, security roles, interfaces, and reporting capabilities to align with client-specific requirements. The MDR Solution does not require major product modifications to support the requirements defined in Attachment A. Standard configuration capabilities allow adaptation of program rules, operational processes, reporting needs, and integrations.

| | |
|---|---|
| **ARCH-04** | Describe bidder's ability to provide multiple environments concurrently to support functions including but not limited to production, testing, and training. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's MDR Solution provides multiple environments that support production, testing, training, development, user acceptance testing, sandbox, and disaster recovery activities. The solution is hosted in Microsoft Azure and supports concurrent use of these environments throughout implementation and operations. Separate environments support system integration testing, user acceptance testing, training, configuration activities, and production operations. The architecture allows project teams, business users, and technical staff to work in parallel without affecting production services. The MDR Solution includes dedicated production and disaster recovery environments. Additional environments support development, testing, and training functions during implementation and ongoing maintenance activities.

| | |
|---|---|
| **ARCH-05** | 1. Bidder shall review the accessibility requirements described in the following:<br>a. Section 508 compliance standards https://www.section508.gov/manage/laws-and-policies/)<br>b. 45 CFR Part 85 (https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-A/part-85)<br>c. State of Nebraska Accessibility requirements (https://nitc.nebraska.gov/standards/index.html#2)<br><br>Bidder must confirm that your company has read, understands, and can meet all the capabilities and/or requirements as outlined for each of the items +and+ indicate how your solution will meet such requirements as they relate to the accessibility requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent has reviewed the accessibility requirements identified in Section 508, 45 CFR Part 85, and the State of Nebraska Accessibility Standards and confirms that the MDR Solution can meet the applicable accessibility capabilities and requirements. The MDR Solution is delivered through standards-based web technologies and incorporates accessibility features that support keyboard navigation, screen reader compatibility, color contrast considerations, accessible forms and controls, alternative text support, and logical page structure.

Conduent incorporates accessibility requirements throughout the system lifecycle by evaluating accessibility during solution configuration, design reviews, development activities, testing, training development, and user acceptance testing. Accessibility validation is performed as part of quality assurance activities using accessibility testing tools and manual review processes to identify and address potential issues before production deployment.

The MDR Solution is web-based and supports access through standard browsers without requiring specialized desktop software. User documentation, training materials, and operational procedures are developed with accessibility considerations in mind. During implementation, Conduent works with DHHS stakeholders to review accessibility requirements, validate accessibility-related configurations, and address any State-specific accessibility needs.

Through these processes, the MDR Solution provides the functionality, accessibility controls, testing practices, and operational support needed to satisfy applicable federal and State accessibility requirements.

| | |
|---|---|
| **ARCH-06** | 1. The bidder's solution must provide Scalability and High Availability Architecture. The bidder must describe how their solution will meet this requirement. The response must include, at a minimum, the following details:<br>a. The system architecture must support scaling with increased load.<br>b. The system must provide high availability to support minimum disruptions to the business operations.<br>c. The system must handle notifications when a component or interface endpoint is unavailable.<br>d. The system must handle performance functionality and monitoring tools.<br>e. The system must handle recovery of failed transactions because of a component failure.<br>f. The system must be available online Monday to Friday 7AM to 6PM Central Time during State working days. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's MDR Solution provides a scalable, high-availability architecture hosted in Microsoft Azure. The solution uses cloud-native services, load balancing, auto-scaling, geographically separated environments, and disaster recovery capabilities. It also meets the following details:

a) The MDR Solution supports scaling as transaction volumes, users, interfaces, and processing demands increase. Azure auto-scaling and resource management capabilities allow the platform to adjust capacity based on workload demands.
b) The solution provides high availability through Azure Availability Zones, Azure Region Pairing, Azure Load Balancer, Azure Traffic Manager, redundant infrastructure components, and disaster recovery services. These capabilities support continuous operations and minimize service disruptions.
c) The MDR Solution includes automated monitoring, alerts, notifications, and operational dashboards. System alerts are generated when performance thresholds, interfaces, or application components require attention. Notifications are routed to support teams for investigation and resolution.
d) The solution uses monitoring and performance management tools, including application and infrastructure monitoring capabilities. These tools provide visibility into availability, latency, throughput, and system health.
e) Recovery capabilities support transaction processing continuity in the event of component failures. The solution uses redundancy, failover mechanisms, backup services, replication, and disaster recovery processes to restore processing functions and recover affected transactions.
f) The MDR Solution supports availability requirements that exceed the State's required operating hours of Monday through Friday, 7:00 AM to 6:00 PM Central Time. The solution is designed for continuous operations and supports 24/7 availability.

| DATA MANAGEMENT | |
|---|---|
| **Number** | **Requirement Description** |
| **DM-01** | The bidder solution must use industry standard cryptographic modules such as those certified to meet FIPS 140-2/-3 for encrypting data at rest and in transit. Bidder must describe how their approach will meet this requirement. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's MDR Solution uses industry-standard cryptographic controls, including FIPS 140-2 and FIPS 140-3 validated cryptographic modules available within the Microsoft Azure environment, to protect data at rest and in transit. Data transmitted between users, interfaces, system components, and external entities is protected using encrypted communication protocols. Data stored within the hosted environment is protected using encryption technologies supported by Azure services that leverage FIPS-compliant cryptographic capabilities.

| | |
|---|---|
| **DM-02** | Describe the bidder's technical approach for supporting data conversion and data migration. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent uses a structured data conversion and migration methodology during MDR Solution implementation. The approach begins with data discovery sessions to identify source systems, data elements, conversion scope, business rules, and retention requirements. Our team performs detailed mapping between source data and the MDR Solution data model. Conversion rules are documented and reviewed with State stakeholders before development activities begin. Data quality assessments are also performed to identify anomalies, duplicates, and incomplete records that may affect conversion results.

The MDR Solution provides dedicated environments for development, testing, user acceptance testing, training, and production activities. These environments support multiple conversion cycles, validation activities, and reconciliation efforts before production deployment. Data migration activities include extraction, transformation, loading, reconciliation, and verification processes. Conversion results are reviewed against source data to confirm record counts, relationships, and business rule execution. Any exceptions are analyzed and resolved through an established issue management process.

Prior to production deployment, Conduent conducts end-to-end testing, operational readiness activities, and final migration rehearsals. This approach allows stakeholders to validate converted data and confirm operational readiness before go-live.

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| **DM-03** | 1. The bidder's solution must support data integration. The bidder must describe how their solution will meet this requirement. The response must include, at a minimum, the following details:<br>a. Ability to import and export data using these file types (XML, JSON, CSV).<br>b. Support for integration using industry standards approaches and principles for REST APIs and Webservices.<br>c. Support for industry integration data standards for Health Level 7 (HL7), Fast Healthcare Interoperability Resources (FHIR), X-12, HIPAA. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's MDR Solution provides a flexible integration framework designed to support data exchange across internal and external systems. The architecture uses industry-standard integration methods and supports interoperability across healthcare, financial, and administrative platforms.

a. **Ability to Import and Export Data using these File Types (XML, JSON, CSV).** The MDR Solution supports data import and export processes using commonly accepted industry file formats, including XML, JSON, and CSV. These formats can be used for interfaces, reporting, data exchange, batch processing, and integration activities.

b. **Support for Integration using Industry Standards Approaches and Principles for REST APIs and Web Services.** The MDR Solution uses a service-oriented architecture that supports API-based integrations and web services. The solution provides capabilities to exchange data with external applications, State systems, vendors, and business partners through secure and standards-based integration methods.

c. **Support for Industry Integration Data Standards for Health Level 7 (HL7), Fast Healthcare Interoperability Resources (FHIR), X-12, HIPAA.** The MDR Solution is designed to support healthcare industry standards and interoperability requirements. The architecture supports HIPAA-compliant transactions and integration approaches that align with HL7, FHIR, and X-12 standards where required by interfacing systems and business processes.

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| **DM-04** | The bidder solution must securely dispose of State data from its systems upon request and in accordance with the National Institute for Standards and Technology (NIST) Special Publication 800-88 revision 1 (https://nvlpubs.nist.gov/nistpubs/SpecialPublications/NIST.SP.800-88r1.pdf) and must provide to DHHS a certificate of data destruction. Bidder must describe how their approach will meet this requirement. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent follows established data lifecycle management practices for the MDR Solution, including the secure disposition of State data when requested or at contract termination. The solution operates within a secure Microsoft Azure environment and follows security controls aligned with NIST-based standards and government healthcare requirements.

Upon authorization from DHHS, Conduent will execute data destruction activities in accordance with documented security and operational procedures. These activities include the removal of State data from production, backup, storage, and disaster recovery environments, as applicable to the approved data disposition scope. Conduent's data destruction processes align with NIST Special Publication 800-88 Revision 1 guidance for media sanitization. Procedures are designed to prevent unauthorized recovery of State data and to maintain appropriate audit records throughout the disposition process.

Following completion of the data destruction activities, Conduent will provide DHHS with written documentation confirming completion of the destruction process, including a certificate of data destruction.

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| **DM-05** | Bidder shall review the data retention requirements described in the following:<br>a. 45 CFR Part 164.316 (https://www.ecfr.gov/current/title-45/subtitle-A/subchapter-C/part-164/subpart-C/section-164.316)<br><br>Bidder must meet all the capabilities and/or requirements as outlined for each of the items and indicate how your solution will meet such requirements as they relate to the data retention requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent has reviewed the data retention requirements identified in 45 CFR Part 164.316. The MDR Solution provides data retention, backup, audit, and record management capabilities that support regulatory and operational requirements. The MDR Solution maintains business records, audit information, system documentation, security-related records, and transactional data in accordance with established retention policies. Historical data remains available to authorized users based on security roles and operational needs. The solution supports retention of system logs, audit trails, configuration information, security documentation, and operational records. These capabilities support compliance activities, reporting requirements, audits, investigations, and program oversight.

The MDR Solution operates within a secure Microsoft Azure environment that includes backup, recovery, and record retention capabilities. Data retention processes are managed in accordance with applicable contractual, regulatory, and organizational requirements. Conduent works with DHHS during implementation to review retention schedules and establish retention policies that align with State and federal requirements. The MDR Solution supports the retention, retrieval, protection, and disposition of information throughout the data lifecycle.

| SECURITY, PRIVACY, AND COMPLIANCE | |
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| **Number** | **Requirement Description** |
| **SPC-01** | 1. Bidder shall review the standards and policies described in the following:<br>a. DHHS Information Technology (IT) Security Policies and Standards (http://dhhs.ne.gov/ITSecurity).<br>b. Nebraska Information Technology Commission (NITC) Standards and Guidelines (https://nitc.nebraska.gov/standards/index.html).<br>c. Health Insurance Portability and Accountability Act (HIPAA) of 1996.<br>d. Health Information Technology for Economic and Clinical Health Act (HITECH) of 2009<br>e. Nebraska Electronic Signature Statute (http://www.nebraskalegislature.gov/laws/statutes.php?statute=86-611)<br>f. Privacy Act of 1974<br><br>Bidder must meet all the capabilities and/or requirements as outlined for each of the items and indicate how your solution will meet such requirements as they relate to the standards and policies described above. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent has reviewed the DHHS Information Technology Security Policies and Standards, Nebraska Information Technology Commission standards, HIPAA, HITECH, the Nebraska Electronic Signature Statute, and the Privacy Act of 1974 and confirms that the MDR Solution can support the applicable requirements.

The MDR Solution meets these requirements through multiple layers of administrative, technical, and operational security controls. Access to the solution is controlled through role-based security, user authentication, authorization controls, and least-privilege access principles. Sensitive information is protected through encryption of data at rest and in transit, while audit logging captures user activity, security events, data access, and administrative actions to support oversight and compliance reviews.

The solution operates within a secure Microsoft Azure environment that incorporates security monitoring, vulnerability management, backup and recovery capabilities, incident response procedures, and disaster recovery controls. Interfaces, file transfers, APIs, and external communications are secured through approved encryption methods and controlled access mechanisms.

Conduent incorporates security and privacy requirements throughout implementation and operations. Security controls and procedures are reviewed during solution design, configuration, testing, deployment, operations, maintenance, and change management activities. Security assessments, vulnerability scanning, penetration testing, audit reviews, and ongoing monitoring help identify and address potential risks.

Electronic records, audit trails, user activity records, security logs, and access controls support compliance, record retention, accountability, and operational oversight requirements. During implementation, Conduent collaborates with DHHS to review State-specific security, privacy, governance, and compliance requirements and incorporates approved policies and procedures into the operational environment.

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| **SPC-02** | The bidder must agree to conduct an independent, third-party penetration test for the solution which they are offering within one year prior to the anticipated go-live date that includes, at a minimum, the Open Web Application Security Project (OWASP) Top 10. Identified risks must be classified by severity and additional information must be provided for any risks identified as medium and above. This must be conducted at no additional charge to DHHS. Bidder must conduct this test at the appropriate time and describe how their approach will meet these requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent will conduct an independent third-party penetration test of the MDR Solution within one year prior to the anticipated production go-live date. The assessment will evaluate the security posture of the solution and associated components that are within the implementation scope. The testing approach will include industry-recognized methodologies and security practices, including validation against the Open Web Application Security Project (OWASP) Top 10. Testing activities will evaluate application, infrastructure, and interface security controls as appropriate to the deployed environment.

All identified findings will be documented and classified by severity. Results will include a description of the finding, affected components, potential impact, recommended remediation activities, and status. Additional details will be provided for findings classified as Medium, High, or Critical severity. Conduent will review the assessment results, address applicable findings through established remediation processes, and provide the final testing report and supporting documentation to DHHS upon request.

Testing activities include:

- Independent third-party penetration testing performed within one year prior to go-live
- Validation against OWASP Top 10 security risks
- Review of application, interface, API, authentication, and infrastructure security controls
- Identification and exploitation testing of potential vulnerabilities
- Documentation and severity classification of findings
- Verification of remediation activities and corrective actions
- Delivery of assessment results and supporting documentation to DHHS

All identified findings are documented and classified by severity. Results include a description of the finding, affected components, potential impact, recommended remediation activities, and status. Additional details are provided for findings classified as Medium, High, or Critical severity. Conduent reviews assessment results, remediates applicable findings through established security management processes, validates corrective actions, and provides the final penetration testing report and supporting documentation to DHHS. All testing activities are performed at no additional cost to DHHS.

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| **SPC-03** | The bidder must agree to conduct an annual independent third-party penetration test of the solution that includes the Open Web Application Security Project (OWASP) Top 10. The report must provide details of the critical, high, and medium findings and associated risks. This must be conducted at no additional charge to DHHS. Bidder must conduct this test at the appropriate time and describe how their approach will meet these requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent will conduct an annual independent third-party penetration test of the MDR Solution. The testing will be performed by qualified security professionals using industry-recognized methodologies and practices. The annual assessment will include testing against the Open Web Application Security Project (OWASP) Top 10 and will evaluate the security of the application, infrastructure, and external-facing components that are within scope.

The penetration test report will document identified findings and associated risks. Findings will be categorized by severity and will include details for Critical, High, and Medium findings. The report will also provide recommended remediation actions and status information, as applicable. Conduent will review results from each assessment and address identified risks through established security and remediation processes. Testing activities will be scheduled to support operational requirements and minimize business disruption. These annual penetration testing services will be provided at no additional cost to DHHS.

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| **SPC-04** | The bidder must agree to conduct an independent, third-party security and privacy controls assessment that aligns with the National Institute for Standards and Technology (NIST) SP 800-53 moderate standard, within one year prior to the go-live date. Identified security gaps must be classified by severity, and additional information must be provided for any gap identified as medium and above. This must be conducted at no additional charge to DHHS. Bidder must conduct this assessment at the appropriate time and describe how their approach will meet these requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent agrees to conduct an independent, third-party Security and Privacy Controls Assessment within one year prior to the MDR Solution go-live date and at no additional cost to DHHS. The assessment will evaluate the implemented solution against security and privacy controls aligned with the NIST SP 800-53 Moderate baseline and will include review of administrative, technical, and operational controls applicable to the production environment.

Conduent will coordinate the assessment at the appropriate stage of the implementation lifecycle, after system configuration, interfaces, security controls, and operational procedures have been established and before production deployment. The assessment will evaluate the effectiveness of implemented security and privacy controls, identify potential control gaps, and provide recommendations for remediation where appropriate.

Identified findings will be documented and classified by severity. For any finding assessed as Medium, High, or Critical severity, the assessment report will include a description of the gap, affected controls, potential impact, recommended corrective actions, and remediation status. Conduent will review assessment results, implement applicable remediation activities, validate corrective actions, and provide supporting documentation to DHHS upon request.

Assessment results, remediation activities, and final status will be tracked through established security and project governance processes to support production readiness and compliance with DHHS security and privacy requirements. Conduent will perform these activities as part of the implementation effort at no additional charge to DHHS.

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| **SPC-05** | The bidder must agree to conduct an annual independent third-party security controls assessment that meets the National Institute for Standards and Technology (NIST) SP 800-53 moderate standard. The report must provide details of the critical, high, and medium findings and associated risks. This must be conducted at no additional charge to DHHS. Bidder must conduct this assessment at the appropriate time and describe how their approach will meet these requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent will conduct an independent third-party security and privacy controls assessment of the MDR Solution within one year prior to the anticipated go-live date. The assessment will evaluate security and privacy controls against the NIST SP 800-53 Moderate baseline. The assessment will be performed by qualified independent security professionals. The review will evaluate administrative, technical, and operational controls across the MDR Solution environment and supporting infrastructure. Assessment results will be documented in a formal report. All identified security and privacy gaps will be classified by severity. Findings categorized as Medium, High, or Critical will include a description of the gap, potential impact, affected components, and recommended remediation activities.

Conduent will review assessment results and address identified findings through established risk management and remediation processes. Assessment activities will be scheduled to align with the implementation timeline and minimize operational impacts. The assessment and reporting activities described above will be provided at no additional cost to DHHS.

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| **SPC-06** | 1. Describe the bidder solution for the following: Support for self-service password activities.<br>a. Automatic log-off procedures after determined time of session inactivity.<br>b. Automatic account disablement after 120 days of inactivity.<br>c. Administrators' ability to lockout user(s).<br>d. Support and approach for single sign-on with State Active Directory<br>e. Support and approach for Multi-Factor Authentication<br>f. Automatic locking of account after determined number of failed logon attempts. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

The MDR Solution provides user authentication and access management capabilities through a combination of application security controls and enterprise identity management services.

a. **Automatic Log-off Procedures after Determined Time of Session Inactivity.** The MDR Solution supports configurable session timeout settings. User sessions can automatically terminate after a defined period of inactivity based on DHHS security policies and operational requirements.

b. **Automatic Account Disablement after 120 Days of Inactivity.** The MDR Solution supports account lifecycle management capabilities. Inactive account thresholds can be configured to align with DHHS security requirements, including automatic account disablement after a defined period of inactivity.

c. **Administrators' Ability to Lockout User(s).** Authorized administrators can manage user access and lock user accounts when necessary. Administrative controls support account suspension, reactivation, and access management activities.

d. **Support and Approach for Single Sign-on with State Active Directory.** The MDR Solution supports integration with enterprise identity management platforms and single sign-on capabilities. During implementation, Conduent will work with DHHS to integrate with the State's Active Directory environment and establish authentication policies.

e. **Support and Approach for Multi-Factor Authentication.** The MDR Solution supports multi-factor authentication through standard identity and access management services. Multi-factor authentication can be configured based on DHHS security requirements and user access policies.

f. **Automatic Locking of Accounts after Determined Number of Failed Logon Attempts.** The MDR Solution supports configurable account lockout policies. Failed authentication thresholds can be established to lock user accounts after a defined number of unsuccessful login attempts.

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| **SPC-07** | The bidder solution must use role-based security. Bidder must describe how their approach will meet this requirement |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

The MDR Solution provides role-based security as a standard capability. Access to application functions, data, reports, interfaces, and administrative tools is controlled through configurable user roles and permissions. Users are assigned access privileges based on their job responsibilities and authorized business functions. Security roles may be configured to support State staff, operational users, supervisors, administrators, auditors, and other designated user groups.

The MDR Solution allows administrators to manage user roles, assign permissions, and modify access as business needs change. Role assignments restrict users to only the functions and information necessary to perform their assigned duties. Role-based security is applied throughout the application and supports segregation of duties, data protection, audit requirements, and operational governance. Access controls work in conjunction with authentication, logging, and monitoring capabilities to support security and compliance requirements.

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| **SPC-08** | 1. Describe the bidder solution for the following: How user accounts are assigned and managed.<br>a. How the system provides usage reports, such as a listing of all users and their last usage date.<br>b. How the system supports authorization at an attribute/field level (e.g., edit, view). |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

The MDR Solution provides centralized user account administration through role-based security controls. Authorized administrators can create, update, disable, and manage user accounts based on business responsibilities and approved access requirements.

a. **How the System Provides Usage Reports, such as a Listing of All Users and their Last Usage Date.** The MDR Solution includes reporting and audit capabilities that provide visibility into user access and system activity. Authorized administrators can generate user-related reports showing user accounts, assigned roles, account status, access privileges, login activity, and each user's most recent system usage date. Audit logs and reporting capabilities support security reviews, compliance monitoring, account management activities, and operational oversight.

b. **How the System Supports Authorization at an Attribute/Field Level (e.g., edit, view).** The MDR Solution uses role-based permissions to control access to system functions, data, screens, and business processes. User roles determine the level of access available to each user. Permissions can be configured to support activities such as view-only access, data entry, updates, approvals, administrative functions, and other authorized actions. This approach allows access to be aligned with user responsibilities while protecting sensitive information.

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| **SPC-09** | Bidder shall review DHHS Information Technology (IT) Audit Standards located at: (https://www.dhhs.ne.gov/ITSecurity).<br><br>Bidder must meet all the capabilities and/or requirements as outlined and indicate how your solution will meet such requirements.<br>1. As a part of the bidder's response, at minimum, DHHS desires specific information regarding the following elements:<br>a. Detail the data elements that are audited.<br>b. Outline the level of audit tracking being maintained.<br>c. Provide a sample of their audit reports.<br>d. Capabilities for automated audit log evaluation to identify security issues.<br>e. How the bidder monitors, identifies, and reports on events impacting the system, such as attacks and other unauthorized use of the system. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

The MDR Solution provides comprehensive audit, logging, monitoring, and reporting capabilities to support operational oversight, security investigations, compliance activities, and system administration. Audit information is captured across application, user, security, and administrative activities.

a. **Detail the Data Elements that are Audited.** The MDR Solution maintains audit information for user authentication activities, account administration, role assignments, security changes, data updates, configuration changes, workflow actions, report generation, interface processing, and administrative functions. Audit records capture information such as transaction dates and times, user identification, system actions performed, affected records, and status changes.

b. **Outline the Level of Audit Tracking being Maintained.** The MDR Solution maintains detailed audit trails across application and administrative functions. Audit tracking supports user activity reviews, security investigations, compliance reporting, operational monitoring, and historical analysis. Audit records provide visibility into who performed an action, when the action occurred, and what information was affected.

c. **Provide a Sample of their Audit Reports.** The MDR Solution provides reporting capabilities that support user activity reviews, security monitoring, operational analysis, and audit reporting. Standard reports and audit logs can be queried, filtered, exported, and reviewed by authorized users. A sample audit report is provided in Section VI.A.2.II.c.4: Security, Privacy, and Compliance Sample Reports of our response.

d. **Capabilities for Automated Audit Log Evaluation to Identify Security Issues.** The MDR Solution supports automated monitoring and alerting capabilities. System logs, audit records, performance metrics, and security events can be evaluated to identify suspicious activity, unauthorized access attempts, configuration changes, failed authentication events, and other potential security concerns. Automated notifications support timely investigation and response activities.

e. **How the Bidder Monitors, Identifies, and Reports on Events Impacting the System, such as Attacks and Other Unauthorized Use of the System.** The MDR Solution uses security monitoring, alerting, logging, and infrastructure monitoring tools to identify system events and potential security threats. Alerts are generated when predefined thresholds or security conditions are met. Operational and security teams review events, investigate anomalies, and take appropriate corrective actions. Monitoring capabilities support the identification of unauthorized access attempts, service disruptions, infrastructure issues, interface failures, and other events that may impact system operations.

| OPERATIONS MANAGEMENT | |
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| **Number** | **Requirement Description** |
| **OM-01** | Describe the Business Continuity and Disaster Recovery (BCDR) plan for the solution they are offering. Bidder's response must describe, at a minimum, their plan to include the following information:<br>1. Procedures for data backup, restoration, communication to DHHS, and emergency mode operations in the event of:<br>a. Hardware or Software Failures.<br>b. Human Error.<br>c. Natural Disaster; and/or<br>d. Other unforeseeable emergencies. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent maintains comprehensive Business Continuity and Disaster Recovery (BCDR) Plans designed to support the continuous operation and rapid recovery of the CMdS Rebate Administration solution. The plans establish the policies, procedures, recovery strategies, communication protocols, and operational controls necessary to restore critical services following a disruption caused by hardware or software failures, human error, natural disasters, cybersecurity events, or other unforeseen emergencies.

The solution is hosted within a secure Microsoft Azure cloud environment that incorporates redundant infrastructure, geographically separated recovery capabilities, automated monitoring, and high-availability features. Production data is replicated to a secondary disaster recovery environment in near real time, allowing recovery operations to be initiated quickly while minimizing data loss. The architecture includes redundant servers, storage, network components, and failover mechanisms that support operational continuity and reduce single points of failure.

The BCDR Plans specifically address a range of potential events, including hardware failures, software failures, human error, natural disasters, and other emergencies that could affect system availability. Our disaster recovery capabilities have been validated through real-world events. For example, following a magnitude 7.1 earthquake near our Anchorage, Alaska facility in 2018, We activated our Business Continuity Plan within an hour of the event, accounted for employee safety, maintained continuous communication with stakeholders, and successfully resumed normal business operations by the next business day. This experience demonstrated the effectiveness of our recovery procedures, communication protocols, and operational readiness during a major natural disaster. Depending on the nature and severity of the event, we may restore services within the primary environment or transition operations to the secondary recovery environment to maintain continuity of MDR operations. The plans include detailed recovery procedures, contact information, escalation paths, and operational decision trees to support timely and effective responses.

To validate readiness, we conduct regular disaster recovery and business continuity testing and use the results to refine procedures, improve recovery effectiveness, and maintain operational preparedness. These activities help confirm that the CMdS Rebate Administration solution remains resilient and capable of supporting DHHS operations during emergency conditions while minimizing disruption to critical business functions.

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| **OM-02** | The bidder must agree to conduct a full disaster recovery test for the solution which they are offering prior to the anticipated go-live date. The most recent test must be within one year prior to the go-live date. This must be conducted at no additional charge to DHHS. Bidder must conduct this test at the appropriate time and describe how their approach will meet these requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent will conduct a full disaster recovery (DR) test of the CMdS Rebate Administration solution prior to production go-live and within one year of the anticipated go-live date. Disaster recovery testing is a standard component of our implementation methodology and operational readiness activities and is provided at no additional cost to DHHS.

The disaster recovery test validates the ability of the solution, infrastructure, data, interfaces, and operational support processes to recover from a declared disaster and successfully resume business operations within established recovery objectives. Testing includes verification of backup and recovery procedures, failover capabilities, data replication processes, system restoration activities, interface connectivity, and operational communications procedures.

Our disaster recovery environment is maintained separately from the production environment and includes replicated application components, databases, security controls, and supporting infrastructure. Production data is replicated to the disaster recovery environment in near real time, allowing recovery procedures to be tested under conditions that closely mirror actual operations.

As part of implementation, the disaster recovery test will be incorporated into operational readiness activities to confirm that recovery procedures, technical controls, support processes, and communications protocols function as designed. Test scenarios will evaluate the ability to recover critical business functions, restore system availability, validate data integrity, and resume rebate operations following a simulated disaster event.

Upon completion of testing, we will document the results, including the test scope, scenarios executed, recovery activities performed, lessons learned, and any corrective actions identified. Any issues discovered during testing will be addressed prior to production deployment to support operational readiness and minimize risk at go-live.

Through this proven approach, Conduent validates disaster recovery capabilities before implementation is complete, providing DHHS with confidence that the CMdS Rebate Administration solution can effectively recover from a major disruption while maintaining continuity of critical MDR Program operations.

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| **OM-03** | The bidder must agree to conduct an annual disaster recovery test for the solution and submit the annual results to the designated individual for DHHS. This must be conducted at no additional charge to DHHS. Bidder must conduct this test at the appropriate time and describe how their approach will meet these requirements. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent conducts annual disaster recovery (DR) and business continuity (BC) testing as part of our standard operational practices for the CMdS Rebate Administration solution. These activities validate the effectiveness of recovery procedures, confirm operational readiness, and demonstrate the ability to recover critical services following a disaster or significant service disruption. Annual disaster recovery testing is provided at no additional cost to DHHS.

The annual DR test evaluates the recovery of application services, databases, interfaces, infrastructure components, and supporting operational processes within the disaster recovery environment. Testing includes validation of backup and restoration procedures, data replication processes, failover capabilities, communications protocols, system availability, and the recovery of critical MDR Program functions. These exercises are designed to confirm that recovery objectives can be achieved and that established procedures remain current and effective.

Our disaster recovery strategy leverages geographically separated recovery resources, near real-time data replication, redundant infrastructure, and documented recovery procedures. Annual testing validates the operational performance of these capabilities and provides an opportunity to verify that changes to applications, infrastructure, interfaces, or business processes have not adversely affected recovery readiness.

Following each annual disaster recovery exercise, we prepare a summary report documenting the test scope, objectives, scenarios executed, recovery results, observations, lessons learned, and any recommended corrective actions or process improvements. The report is submitted to the designated DHHS representative for review and discussion. Any identified issues are tracked through established remediation processes and incorporated into continuous improvement activities as appropriate.

Through routine testing, documentation updates, and continuous evaluation of recovery procedures, we maintain a high level of disaster recovery preparedness and provide DHHS with ongoing assurance that the CMdS Rebate Administration solution can continue to support critical business operations in the event of a disaster.

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| **OM-04** | 1. The bidder solution shall meet the following: Compliance with the Recovery Time Objective (RTO) of within twelve (12) hours when the system outage is declared as a disaster.<br>a. Compliance with the Recovery Point Objective (RPO) of fifteen (15) minutes of data lost before the disaster event |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent's CMdS Rebate Administration solution is designed to support disaster recovery objectives that meet or exceed DHHS's required Recovery Time Objective (RTO) of twelve (12) hours and Recovery Point Objective (RPO) of fifteen (15) minutes. The solution is hosted within a secure Microsoft Azure environment and leverages redundant infrastructure, automated backup processes, geographically separate recovery resources, and near real-time data replication to support rapid recovery and operational continuity.

To support recovery objectives, production data is continuously replicated to a dedicated disaster recovery environment using warm standby architecture and synchronized database replication technologies. This approach minimizes potential data loss and allows recovery operations to resume using current transactional information. Our disaster recovery architecture supports an RPO of fifteen (15) minutes or less through near real-time replication of production data and system configurations.

In the event of a declared disaster, we follow documented recovery procedures that include failover activation, system restoration, validation of critical application and interface functionality, and resumption of production operations. Recovery processes are designed to restore critical MDR Program services within the required twelve-hour RTO and are regularly validated through disaster recovery testing and operational readiness activities.

The disaster recovery environment maintains the infrastructure, applications, security controls, and data necessary to support continuity of operations. Recovery procedures address the restoration of application services, databases, interfaces, reporting capabilities, and supporting operational functions to enable timely resumption of business activities following a disruption. Regular testing and validation activities help confirm recovery readiness and the continued ability to meet established recovery objectives.

Through this architecture and operational approach, we provide you with a resilient, highly available solution capable of recovering critical business functions while meeting the State's recovery requirements for system availability and data protection.

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| **OM-05** | 1. Describe the bidder solution for the following: Overall testing strategy and support for the following testing types: unit testing, system testing, integration testing, regression testing, user acceptance testing (UAT), parallel testing, performance and load testing, manual and automated and/or scripted testing, and end-to-end integration testing.<br>a. Approach to planning and preparing the test/staging environment.<br>b. Approach to conducting each test level.<br>c. Approach for testing nonfunctional requirements (security, performance, etc.).<br>d. Approach to test documentation (e.g., test cases, test scripts, test case matrices added as the design configuration progresses).<br>e. Approach to quality control/quality assurance.<br>f. Approach to test results reporting, traceability, and metrics |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

We use a comprehensive testing and quality management methodology that is integrated throughout the System Development Life Cycle (SDLC) to validate functionality, performance, security, interoperability, and operational readiness of the CMdS Rebate Administration solution. Our approach combines industry-standard testing practices, structured quality assurance processes, requirements traceability, and collaborative stakeholder participation to deliver a stable, reliable, and production-ready solution.

We develop a Master Test Plan that defines testing objectives, environments, test scenarios, roles and responsibilities, entry and exit criteria, defect management procedures, traceability requirements, and reporting processes. We test across dedicated development, system integration, user acceptance, training, and production-preparation environments to confirm that each stage accurately reflects its intended purpose. Test environments are established and maintained to support functional, technical, integration, security, and operational validation activities.

Our testing strategy encompasses all required testing levels, including unit testing, system testing, integration testing, interface testing, regression testing, end-to-end testing, user acceptance testing (UAT), parallel testing, performance and load testing, security testing, and business continuity/disaster recovery testing. Testing is performed throughout implementation using iterative design and configuration cycles, allowing issues to be identified and resolved early while providing continuous visibility into system readiness.

We conduct nonfunctional testing activities to verify solution performance, scalability, reliability, security, availability, and recoverability. Security testing includes vulnerability assessments, access-control validation, and security reviews, while performance testing evaluates response times, throughput, processing capacity, and system behavior under various workload conditions. Business continuity and disaster recovery testing validate recovery procedures and operational resilience.

Test case development and execution are managed through established requirements traceability processes. Requirements, design artifacts, test cases, test scripts, defects, and test results are linked and tracked to support end-to-end validation and complete traceability throughout the project lifecycle. Conduent maintains a Requirements Traceability Matrix (RTM) and utilizes lifecycle management tools such as Azure DevOps to provide visibility into testing progress, defect resolution, and overall solution readiness.

Quality assurance and quality control activities are embedded throughout the implementation process. Deliverables, configurations, test cases, scripts, and results undergo peer reviews, quality reviews, and formal validation activities to verify completeness, accuracy, and compliance with project requirements. Defects identified during testing are documented, prioritized, tracked, and resolved through established defect management procedures, with corrective actions implemented and retested prior to closure.

We provide regular test status reporting throughout implementation, including test execution metrics, defect trends, requirements coverage, readiness assessments, and overall progress toward testing milestones. Test results are reviewed collaboratively with DHHS to validate successful completion of testing activities and confirm readiness for user acceptance testing, operational readiness review, and production deployment. Through this disciplined testing approach, we deliver a thoroughly validated solution that supports the operational, technical, and business requirements of Nebraska's Medicaid Drug Rebate Program.

| | |
|---|---|
| **OM-06** | 1. Describe the bidder solution for software maintenance processes that address the following:<br>a. Approach to managing software versions to ensure bidder support.<br>b. Approach to Change Management, including defects and enhancements.<br>c. Approach to testing and release management.<br>d. Approach to maintaining integration with external and internal trading partners. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder’s Response] |

Conduent employs a structured software maintenance and release management methodology that supports the ongoing stability, security, and performance of the CMdS Rebate Administration solution. Our approach incorporates software version management, change management, defect resolution, enhancement delivery, testing, release management, and integration maintenance activities within a controlled operational framework. This methodology supports continuous improvement while minimizing operational disruption and maintaining alignment with DHHS business and technical requirements.

We manage software versions through a planned release strategy that includes emergency releases, quarterly maintenance releases, annual major releases, security updates, technology upgrades, defect corrections, regulatory updates, and client-approved enhancements. Release schedules are communicated in advance and coordinated with DHHS to support operational planning and minimize impacts to business operations. All software updates follow established development, testing, approval, and deployment procedures before implementation in the production environment.

Conduent maintains a formal change management process for all defects, enhancements, and operational improvements. Requested changes are documented, evaluated, and analyzed to determine business impact, technical impact, implementation effort, schedule considerations, and any associated risks. We review proposed changes with DHHS, provide impact assessments, and obtain appropriate approvals before initiating work. Once approved, enhancements and modifications follow the same disciplined SDLC used during implementation, including requirements validation, design, configuration, testing, user review, and deployment activities.

Testing and release management activities play a central role in maintaining solution quality. Before deployment, updates undergo appropriate levels of testing, including unit, system, integration, regression, performance, security, and user acceptance testing, as applicable. Release packages are validated in non-production environments prior to migration into production. Conduent maintains traceability between requirements, changes, test cases, defects, and deployment activities to support quality control and operational accountability.

We also maintain interfaces and integrations with internal and external trading partners through established interface management processes. Interface control documents, integration specifications, and communication protocols are maintained and updated as business or technical requirements evolve. Monitoring tools, automated alerts, reconciliation processes, and operational reviews provide visibility into interface activity and help identify issues for timely resolution. When interface changes are required, Conduent coordinates with DHHS and affected trading partners to assess impacts, conduct testing, and implement modifications in a controlled manner.

Through disciplined maintenance, change control, release management, and integration governance practices, we maintain a stable and secure CMdS Rebate Administration solution while supporting evolving program, regulatory, and operational needs throughout the contract period.

| | |
|---|---|
| **OM-07** | Describe the incident management process that will be used to report business and security incidents (such as any unauthorized access to, or incidents where data may have been compromised). |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder's Response] |

Conduent maintains a comprehensive incident management program to identify, report, investigate, escalate, resolve, and document business and security incidents affecting the CMdS Rebate Administration solution. The program supports rapid response to operational disruptions, security events, system failures, unauthorized access attempts, and potential data compromise incidents while maintaining communication with DHHS throughout the incident lifecycle.

Our incident management process begins with continuous monitoring of application, infrastructure, interface, and security events. Automated monitoring tools, alerts, audit logs, operational dashboards, and support personnel identify potential incidents requiring investigation. Events are evaluated to determine severity, business impact, affected services, and required response actions. Incidents are then classified and prioritized according to established operational and security procedures.

When a business or security incident occurs, designated support and security personnel initiate incident response activities that include containment, investigation, root cause analysis, corrective actions, system recovery, and verification of service restoration. Security-related incidents, including unauthorized access attempts, suspected breaches, malware events, or situations involving potential exposure of sensitive information, are managed through documented Incident Response Plans and security response procedures. These procedures support timely investigation, mitigation, and recovery activities while maintaining compliance with applicable regulatory and contractual obligations.

We use established escalation procedures to engage the appropriate technical, operational, management, and security resources based on incident severity. DHHS receives timely notification of significant incidents, along with updates regarding incident status, business impact, recovery activities, and resolution progress. Following resolution, We conduct root cause analysis to identify contributing factors and develop preventive measures that reduce the likelihood of recurrence.

All incidents, corrective actions, resolutions, and supporting documentation are tracked and maintained within our incident management and lifecycle management tools. Detailed records support operational oversight, trend analysis, audit requirements, compliance activities, and continuous improvement efforts. Incident metrics and recurring issues are regularly reviewed to identify opportunities for process improvements, technology enhancements, and risk reduction.

Through proactive monitoring, structured response procedures, formal escalation protocols, and continuous improvement practices, we provide the State with a disciplined incident management approach that protects system availability, safeguards sensitive information, and supports uninterrupted administration of the MDR Program.

| | |
|---|---|
| **OM-08** | 1. The bidder shall describe its approach on providing technical documentation that addresses the following.<br>a. System Operation Manual<br>b. Administrative Operations<br>c. Documentation to support testing and collaboration with integrating systems.<br>d. Documentation of the system's data dictionary which includes user-defined fields and tables. |
| | Met the requirement: YES<br><br>Implementation Approach: Out of Box (OOB) |
| | [Bidder’s Response] |

Conduent provides comprehensive technical and operational documentation to support implementation, testing, operations, maintenance, system administration, knowledge transfer, and ongoing collaboration with the State and its integration partners. Documentation is developed throughout the project lifecycle, maintained under version control, and updated as system enhancements, configuration changes, operational improvements, and regulatory updates occur. Authorized users have access to current documentation through a centralized repository that supports transparency, operational readiness, and long-term system support.

**System Operations Manual.** We develop and maintain a System Operations Manual that documents the procedures necessary to operate, monitor, support, and recover the CMdS Rebate Administration solution. The manual includes information related to system architecture, production operations, batch processing, interface monitoring, backup and recovery procedures, disaster recovery processes, operational schedules, troubleshooting guidance, escalation procedures, and routine support activities. This documentation provides the information needed to support day-to-day operations and operational continuity.

**Administrative Operations.** We also provide documentation supporting Administrative Operations, including user administration procedures, security administration processes, role-based access management, configuration management procedures, change management processes, release management activities, audit support procedures, and incident management workflows. Administrative documentation enables authorized DHHS personnel to effectively manage users, security, operational controls, and system governance activities.

To support system testing and collaboration with trading partners, Conduent develops and maintains documentation such as Interface Control Documents (ICDs), technical specifications, interface layouts, transmission protocols, testing procedures, test plans, test cases, test results, requirements traceability matrices, and integration support documentation. These artifacts facilitate interface design, validation, troubleshooting, and ongoing coordination with internal and external systems throughout implementation and operations.

**Documentation.** Conduent maintains documentation of the solution's data structures, including a Data Dictionary that describes system data elements, field definitions, table structures, relationships, valid values, and configuration parameters. Documentation includes both standard system objects and approved user-defined fields and tables implemented during the project. This information supports reporting, interface development, maintenance activities, data analysis, and future system enhancements.

In addition to technical documentation, we provide supporting materials such as user guides, training materials, operational procedures, knowledge transfer documentation, runbooks, and implementation artifacts. All documentation is reviewed periodically and updated to reflect changes to business processes, system configurations, interfaces, and operational practices. Through this comprehensive documentation approach, Conduent provides DHHS with the information and resources necessary to support effective system operation, administration, testing, maintenance, and long-term program success.

| | |
|---|---|
| **OM-09** | The bidder must describe its approach to use and integrate with DHHS JIRA infrastructure for the entire software development lifecycle. |
| | Met the requirement: YES<br><br>Implementation Approach: Configuration |
| | [Bidder’s Response] |

Conduent supports the use of industry-standard application lifecycle management and project collaboration tools and will work closely with the State to integrate project and operational activities with the State's JIRA environment throughout the software development lifecycle. Our implementation and operations teams regularly utilize lifecycle management platforms to support requirements management, backlog management, issue tracking, defect management, testing, change management, release management, and project governance activities.

During project initiation, we collaborate with the State to establish the appropriate integration approach, workflows, user roles, permissions, reporting requirements, and governance processes necessary to support the State's JIRA infrastructure. This collaborative approach allows project stakeholders to maintain visibility into project status, requirements, issues, risks, defects, test activities, change requests, and operational support activities using tools and processes aligned with DHHS standards.

Our software development lifecycle incorporates disciplined requirements traceability, defect tracking, change control, testing management, and release management processes. Requirements, user stories, defects, enhancements, risks, and action items are tracked throughout the project lifecycle and linked to supporting documentation, testing activities, and implementation deliverables. These processes can be configured to align with DHHS JIRA workflows and reporting requirements, providing transparency and traceability from requirements through deployment and ongoing operations.

For implementation and operational support activities, we will use JIRA-based workflows or integrated processes, as directed by DHHS, to manage project tasks, issues, defects, enhancement requests, and change requests. The solution supports established governance practices, including issue prioritization, escalation management, status tracking, resolution monitoring, and change approval workflows. Project teams, business users, technical staff, and DHHS stakeholders can use these tools to collaborate effectively and maintain visibility into project and operational activities.

We also support integration with complementary collaboration and documentation tools, such as Confluence or other DHHS-approved repositories, to maintain project documentation, meeting materials, requirements artifacts, test results, operational procedures, and knowledge transfer resources. This approach provides a centralized and auditable record of project and operational activities throughout the contract lifecycle.

Through this flexible and collaborative approach, we will align our project management, development, testing, change management, and operational support processes with DHHS's JIRA environment, promoting transparency, traceability, and effective collaboration across all phases of the MDR System lifecycle.



Submitted by: **Conduent State Healthcare, LLC**

CONDUENT

**Response to Request for Proposal**

# Medicaid Drug Rebate System (MDR)

## for the State of Nebraska, Department of Health and Human Services (DHHS)

Due Date: **August 6, 2026** | RFP Number: **124528 ON**

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# VI.A.2.II.c Requested Samples

We provide the following requested samples:

- Invoice Management Report Samples
  - IVM-40 Claims Paid by Labeler Report
  - IVM-41 Financial Summary Report
  - IVM-45 Outstanding Balances by Labeler Report
  - IVM-46 Rebate Deposit Report
  - IVM-51 Quarterly Processing Timeline Report
  - IVM-56 Excess Invoice Exception Report
  - IVM-59 Disputed NDC Claims Report
  - IVM-72 Reporting Capability Samples
- Customer Support, Documentation, and Training (CDT) Report Samples
  - CDT-06 Training Plan
- Project Management and Implementation Report Samples
  - PMI-02 Project Management Plan (PMP)
  - PMI-10 Project Work Plan (PWP)
- Security, Privacy, and Compliance Sample Reports
  - SPC-09 Audit Report
- Sample Error Logs Report
- Turnover Plan

VI.A.2.II.c.1 Invoice Management Report Samples

## IVM-40 Claims Paid by Labeler Report

### *Mock-up: Claims Paid by Labeler Report (IVM Req. #40)*

RFP requirement: report listing all claims paid for a specific labeler, in a specific quarter. A sample of the report must be submitted with the Technical Response. No existing report today.

#### *Request Window (Parameters)*

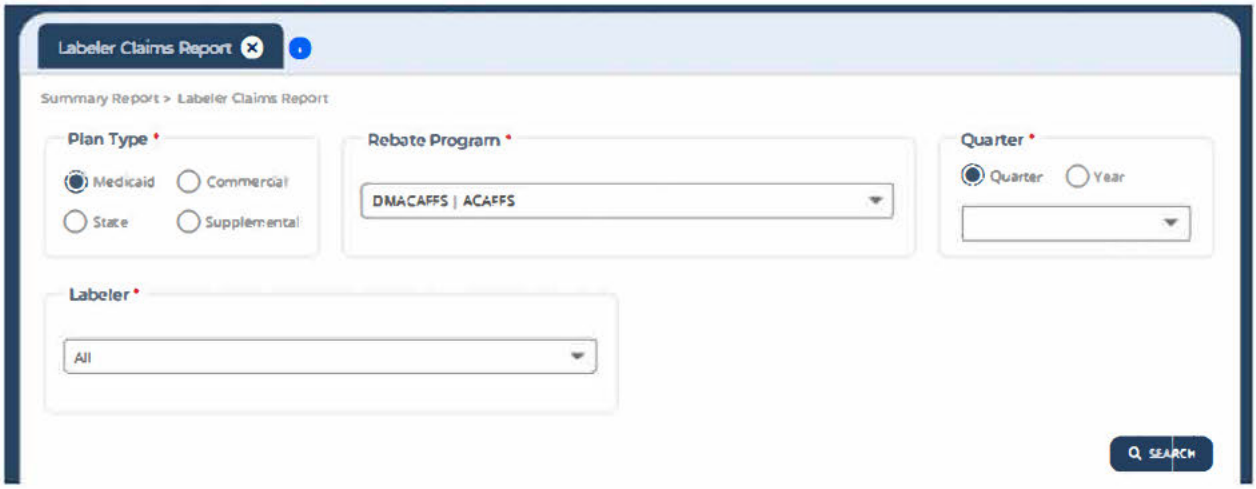
| | |
|---|---|
| **Labeler Name / Labeler ID** | Lookup / type-ahead selection (required) |
| **Quarter / Year** | Drop-down (required) |
| **Program** | Drop-down: All / FFS / MCO (optional) |
| **Output Format** | On-screen grid, PDF, or Excel export |

#### *Output Window – Sample Layout*

| Claim ID | NDC | Drug Name | Date of Service | Units | Amount Paid | Rebate Program |
|---|---|---|---|---|---|---|
| CLM-100234 | 00378-3506-93 | Metformin HCl ER 500mg | 04/14/2026 | 30 | $89.50 | FFS |
| CLM-100511 | 00378-1802-01 | Sertraline HCl 50mg | 05/02/2026 | 90 | $312.75 | MCO |
| CLM-101007 | 00378-6525-01 | Losartan Potassium 50mg | 05/19/2026 | 60 | $138.00 | FFS |
| CLM-101288 | 00378-0018-01 | Amlodipine Besylate 5mg | 06/08/2026 | 30 | $64.25 | MCO |

*Illustrative data only – for layout purposes. Rows shown are for a single selected labeler (Mylan Pharmaceuticals Inc.) across its NDCs for the selected quarter.*

### Request Window



### Output Window



| Claim ID | NDC | Drug Name | Labeler | Date of Service | Qty | Amount Paid |
|---|---|---|---|---|---|---|
| CLM-100234 | 00378-3506-93 | Metformin HCl ER 500mg | Mylan Pharmaceuticals Inc. | 04/14/2026 | 30 | $89.50 |
| CLM-100511 | 00093-7146-01 | Gabapentin 300mg | Mylan Pharmaceuticals Inc. | 05/02/2026 | 90 | $312.75 |
| CLM-101007 | 68180-0519-01 | Losartan Potassium 50mg | Teva Pharmaceuticals USA | 05/19/2026 | 60 | $138.00 |
| CLM-101288 | 65862-0187-01 | Amlodipine Besylate 10mg | Sen Botanicals Inc. | 06/08/2026 | 30 | $64.25 |

Columns

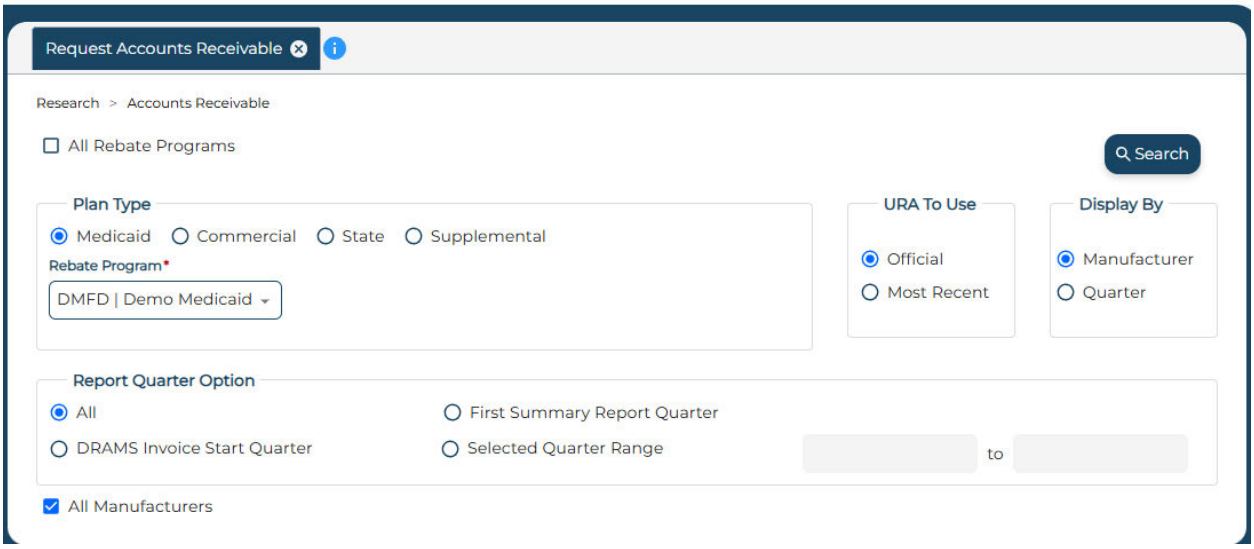
Total Results: 8

## IVM-41 Financial Summary Report

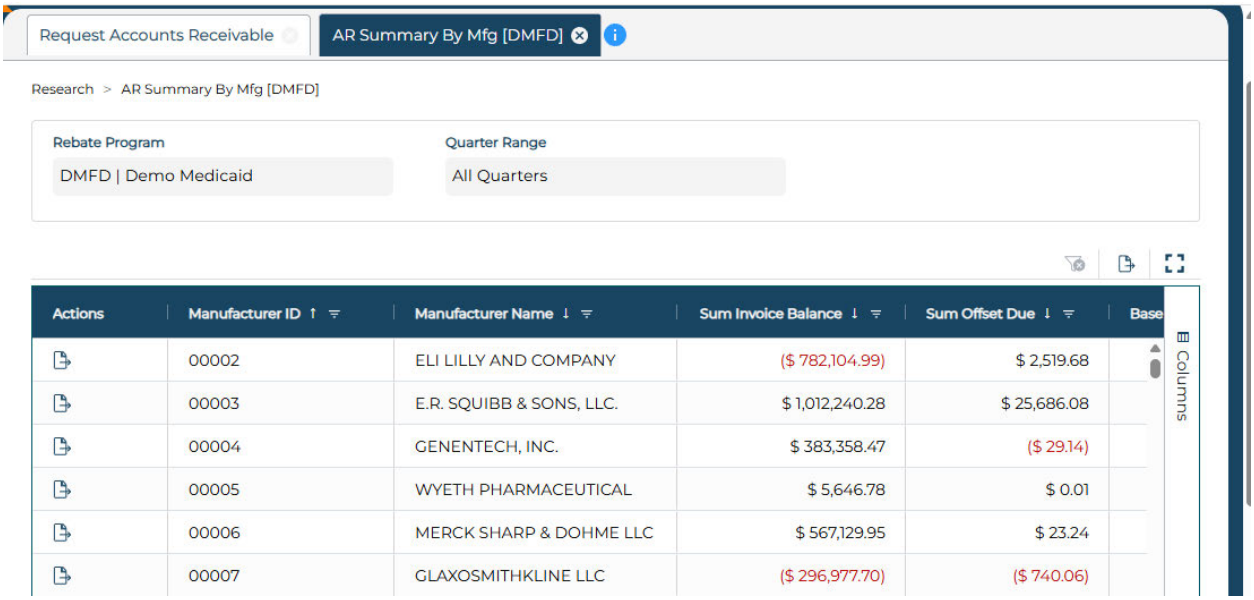
Solution must generate a report listing the total amounts billed, collected, adjusted, interest accrued, credits, disputed, not invoiced, and balance due, for all labelers, broken down by quarter and program. A sample of the report must be submitted with the Technical Response.

**Assumption:** Accounts Receivable meets this requirement.

### Request Window

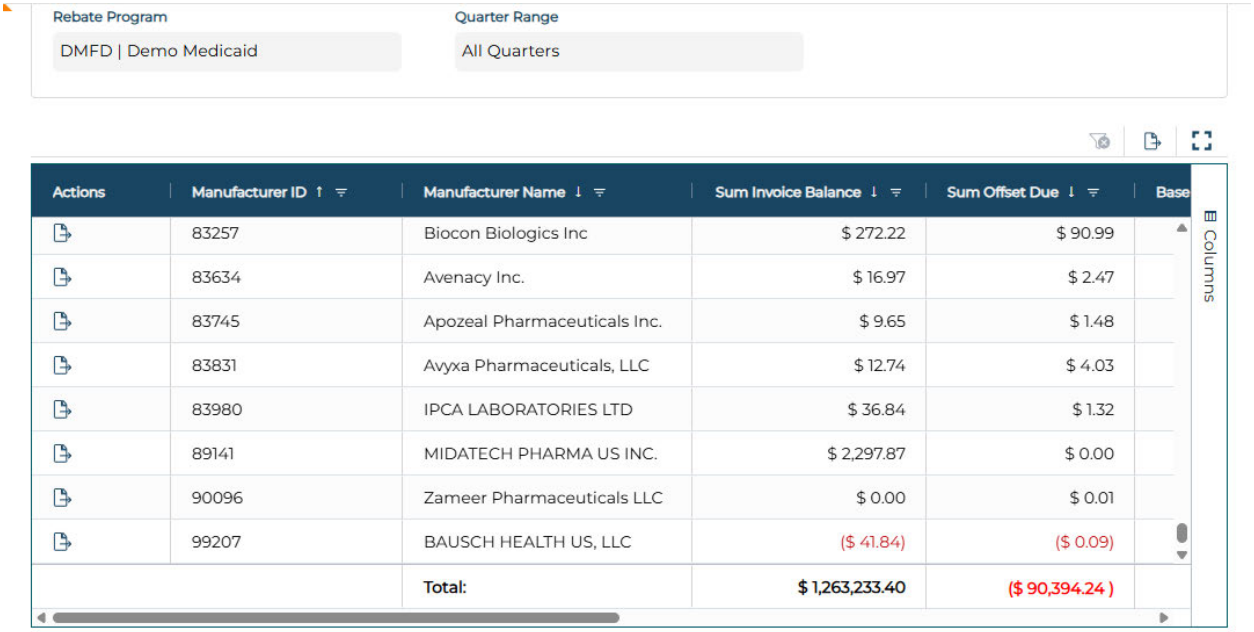


## Output Window




| Actions | Manufacturer ID | Manufacturer Name | Sum Invoice Balance | Sum Offset Due | Base |
|---|---|---|---|---|---|
| | 00002 | ELI LILLY AND COMPANY | ($ 782,104.99) | $ 2,519.68 | |
| | 00003 | E.R. SQUIBB & SONS, LLC. | $ 1,012,240.28 | $ 25,686.08 | |
| | 00004 | GENENTECH, INC. | $ 383,358.47 | ($ 29.14) | |
| | 00005 | WYETH PHARMACEUTICAL | $ 5,646.78 | $ 0.01 | |
| | 00006 | MERCK SHARP & DOHME LLC | $ 567,129.95 | $ 23.24 | |
| | 00007 | GLAXOSMITHKLINE LLC | ($ 296,977.70) | ($ 740.06) | |

## Continued (Bottom Totals)




| Actions | Manufacturer ID | Manufacturer Name | Sum Invoice Balance | Sum Offset Due | Base |
|---|---|---|---|---|---|
| | 83257 | Biocon Biologics Inc | $ 272.22 | $ 90.99 | |
| | 83634 | Avenacy Inc. | $ 16.97 | $ 2.47 | |
| | 83745 | Apozeal Pharmaceuticals Inc. | $ 9.65 | $ 1.48 | |
| | 83831 | Avyxa Pharmaceuticals, LLC | $ 12.74 | $ 4.03 | |
| | 83980 | IPCA LABORATORIES LTD | $ 36.84 | $ 1.32 | |
| | 89141 | MIDATECH PHARMA US INC. | $ 2,297.87 | $ 0.00 | |
| | 90096 | Zameer Pharmaceuticals LLC | $ 0.00 | $ 0.01 | |
| | 99207 | BAUSCH HEALTH US, LLC | ($ 41.84) | ($ 0.09) | |
| | | **Total:** | **$ 1,263,233.40** | **($ 90,394.24 )** | |

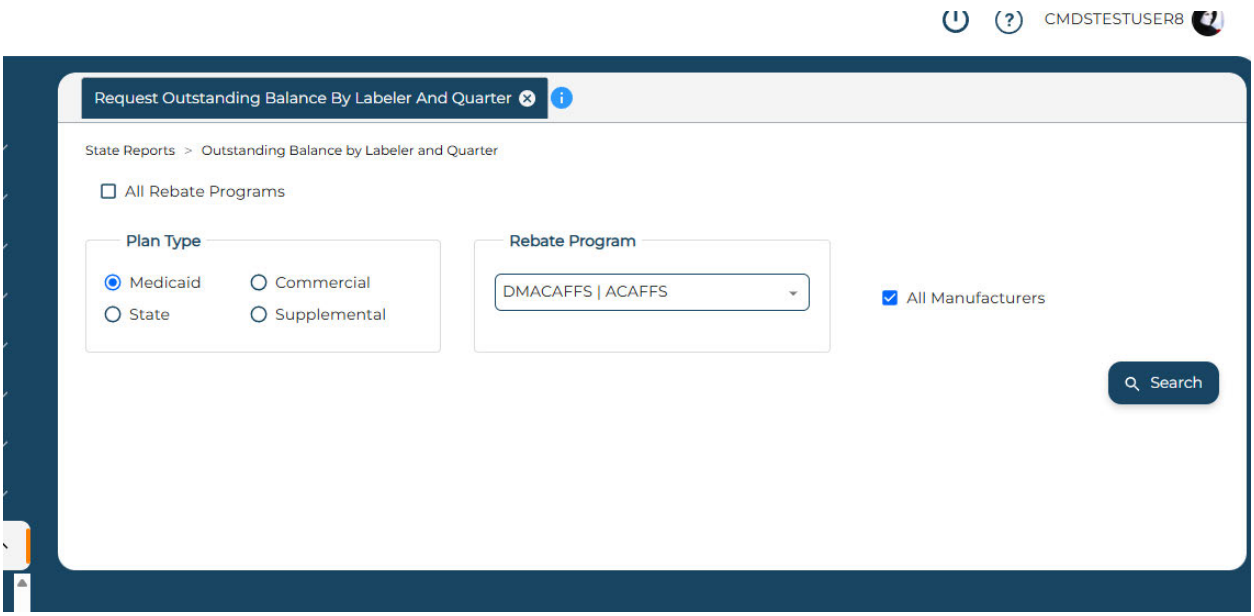
Total Results: **1,269**

# IVM-45 Outstanding Balances by Labeler Report

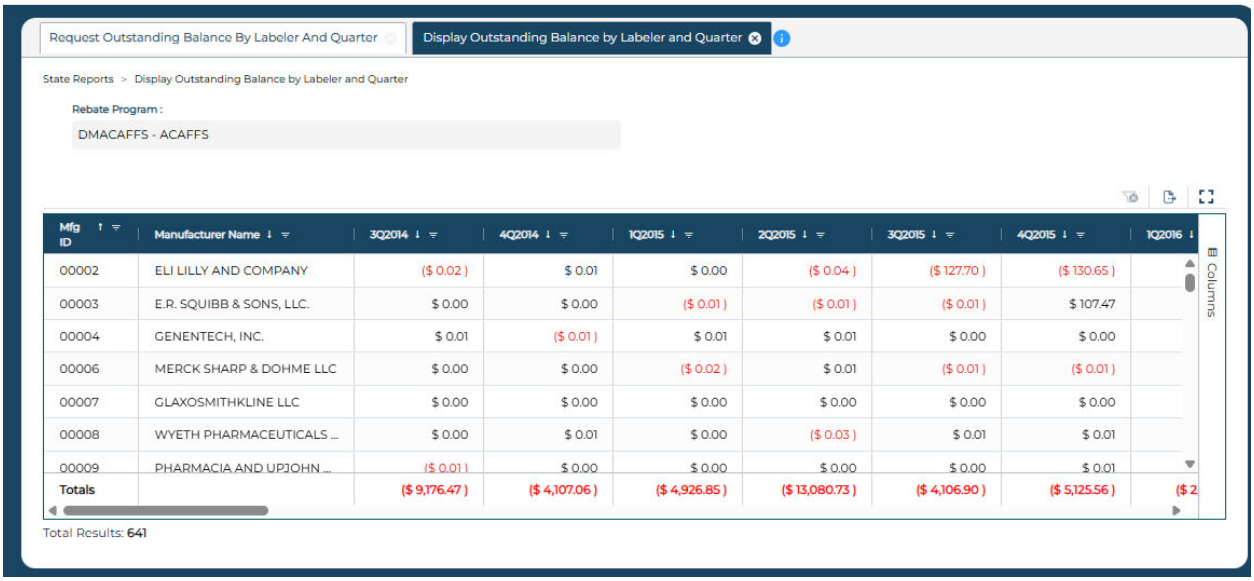
Solution must generate a report listing the outstanding balances by labeler for all invoices and PQAS (Prior Quarter Adjustment Statement) sent in a specified quarter. A sample of the report must be submitted with the Technical Response.

**Assumption:** Outstanding Balance By Labeler and Quarter report

## Request Window




## Output Window



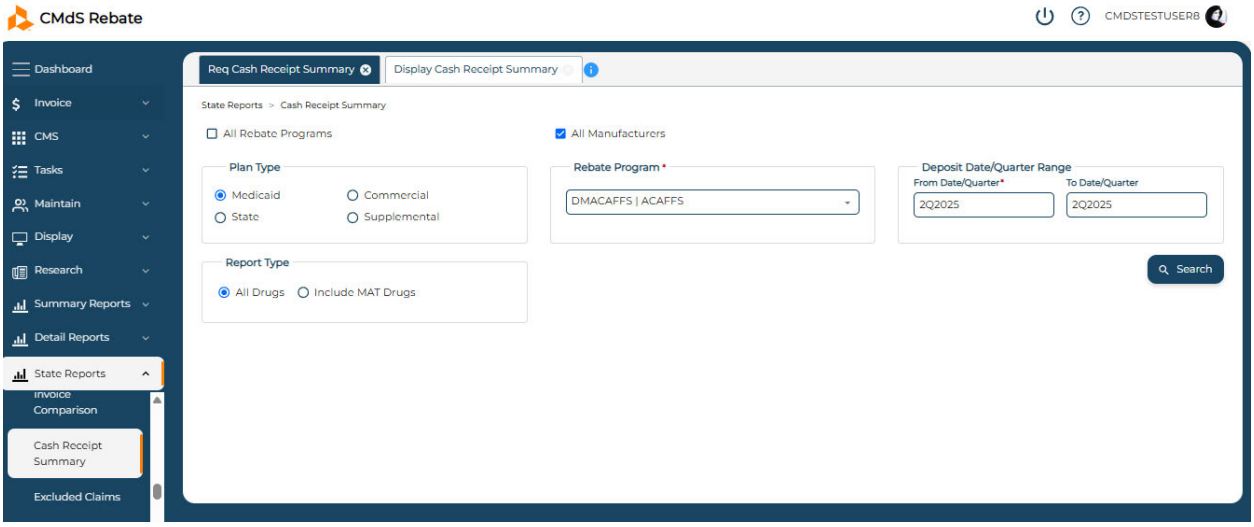

| Mfg ID | Manufacturer Name | 3Q2014 | 4Q2014 | 1Q2015 | 2Q2015 | 3Q2015 | 4Q2015 | 1Q2016 |
|---|---|---|---|---|---|---|---|---|
| 00002 | ELI LILLY AND COMPANY | ($ 0.02) | $ 0.01 | $ 0.00 | ($ 0.04) | ($ 127.70) | ($ 130.65) | |
| 00003 | E.R. SQUIBB & SONS, LLC. | $ 0.00 | $ 0.00 | ($ 0.01) | ($ 0.01) | ($ 0.01) | $ 107.47 | |
| 00004 | GENENTECH, INC. | $ 0.01 | ($ 0.01) | $ 0.01 | $ 0.01 | $ 0.00 | $ 0.00 | |
| 00006 | MERCK SHARP & DOHME LLC | $ 0.00 | $ 0.00 | ($ 0.02) | $ 0.01 | ($ 0.01) | ($ 0.01) | |
| 00007 | GLAXOSMITHKLINE LLC | $ 0.00 | $ 0.00 | $ 0.00 | $ 0.00 | $ 0.00 | $ 0.00 | |
| 00008 | WYETH PHARMACEUTICALS ... | $ 0.00 | $ 0.01 | $ 0.00 | ($ 0.03) | $ 0.01 | $ 0.01 | |
| 00009 | PHARMACIA AND UPJOHN ... | ($ 0.01) | $ 0.00 | $ 0.00 | $ 0.00 | $ 0.00 | $ 0.01 | |
| Totals | | ($ 9,176.47) | ($ 4,107.06) | ($ 4,926.85) | ($ 13,080.73) | ($ 4,106.90) | ($ 5,125.56) | ($ 2 |

# IVM-46 Rebate Deposit Report

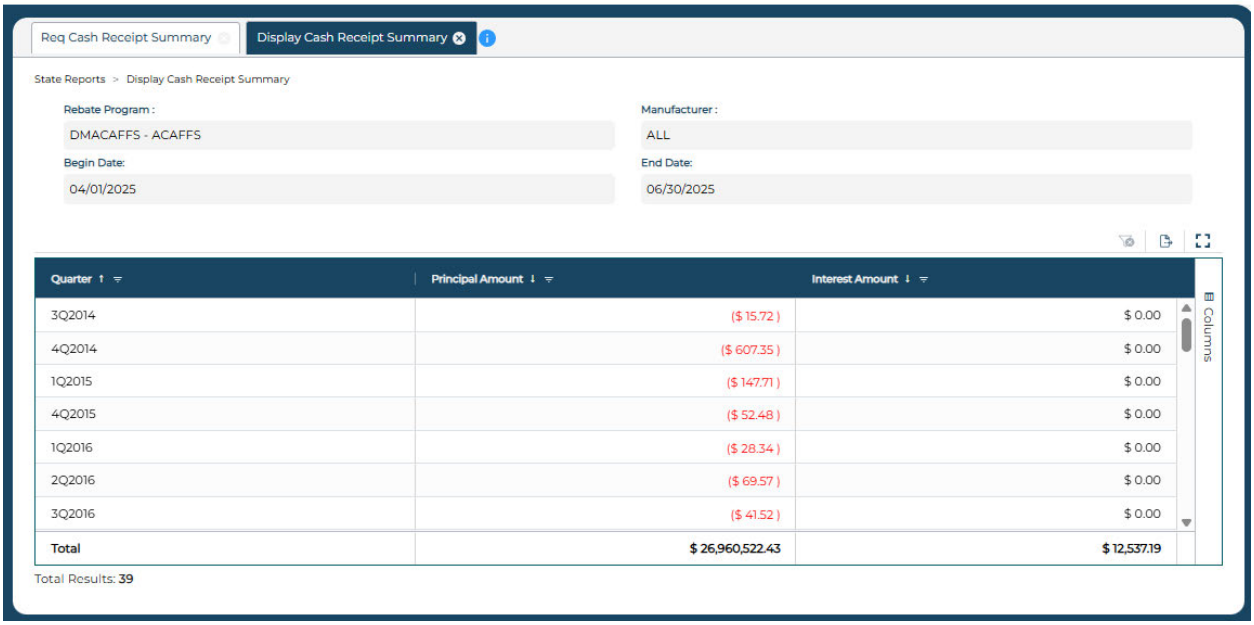
DHHS must meet all federal reporting requirements, as well as those imposed by Nebraska regulations and policies. The MDR solution must have the flexibility to provide reporting for multiple perspectives: e.g. state staff, providers, labelers, participants, etc. Sample reports must be provided with the proposal and will be finalized after reviews with DHHS to determine what additional reporting may be required to meet DHHS needs. Reporting capabilities need to be flexible enough for printing, transfer via multiple output formats and methods, and be customizable by the end user to meet that user's individual needs.

*DHHS reserves the right to add additional reports, change reporting requirements and request on-demand reports as deemed necessary. All reporting must be available in a format that easily allows the data to be imported into state data warehouses and decision support systems.

## Request Window Cash Receipt Summary

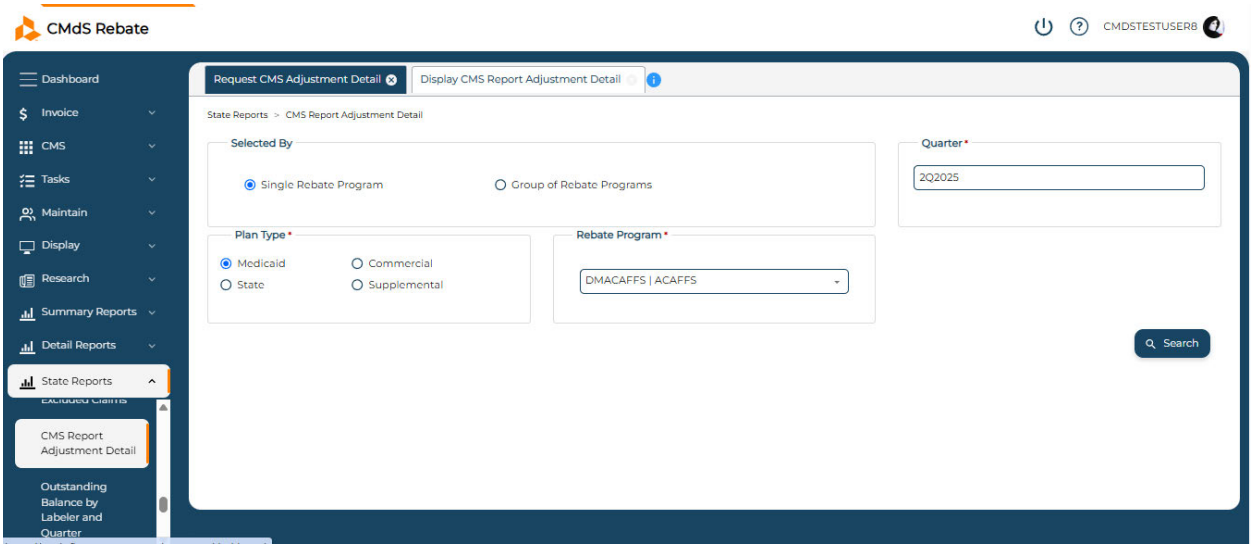



## Output Window

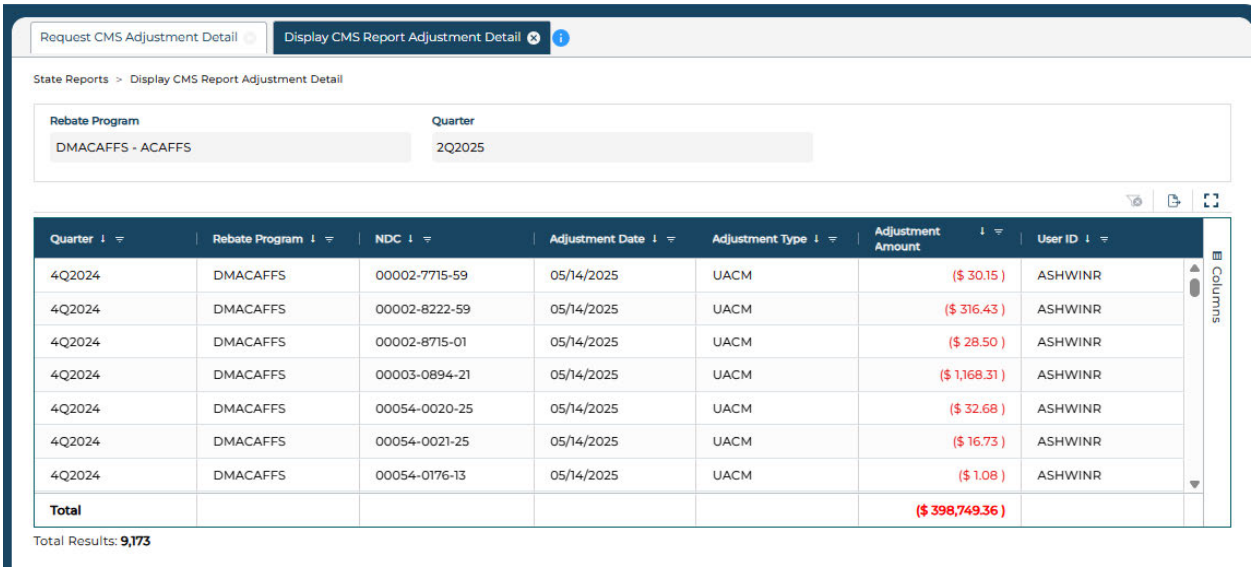



| Quarter | Principal Amount | Interest Amount |
|---|---|---|
| 3Q2014 | ($ 15.72) | $ 0.00 |
| 4Q2014 | ($ 607.35) | $ 0.00 |
| 1Q2015 | ($ 147.71) | $ 0.00 |
| 4Q2015 | ($ 52.48) | $ 0.00 |
| 1Q2016 | ($ 28.34) | $ 0.00 |
| 2Q2016 | ($ 69.57) | $ 0.00 |
| 3Q2016 | ($ 41.52) | $ 0.00 |
| **Total** | **$ 26,960,522.43** | **$ 12,537.19** |

## Request Window CMS Report Adjustment Detail



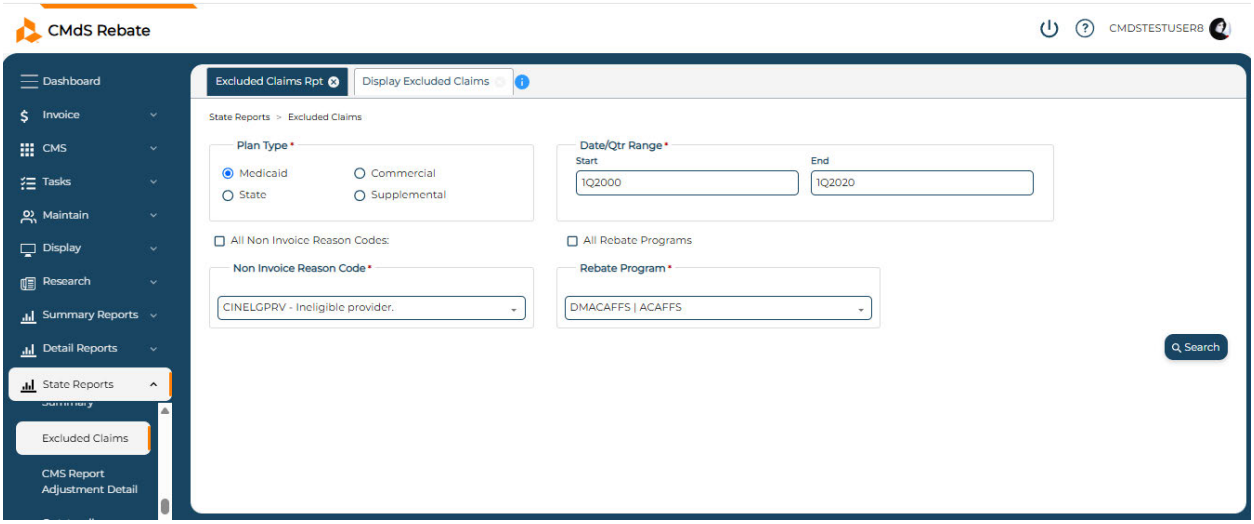

## Output Window



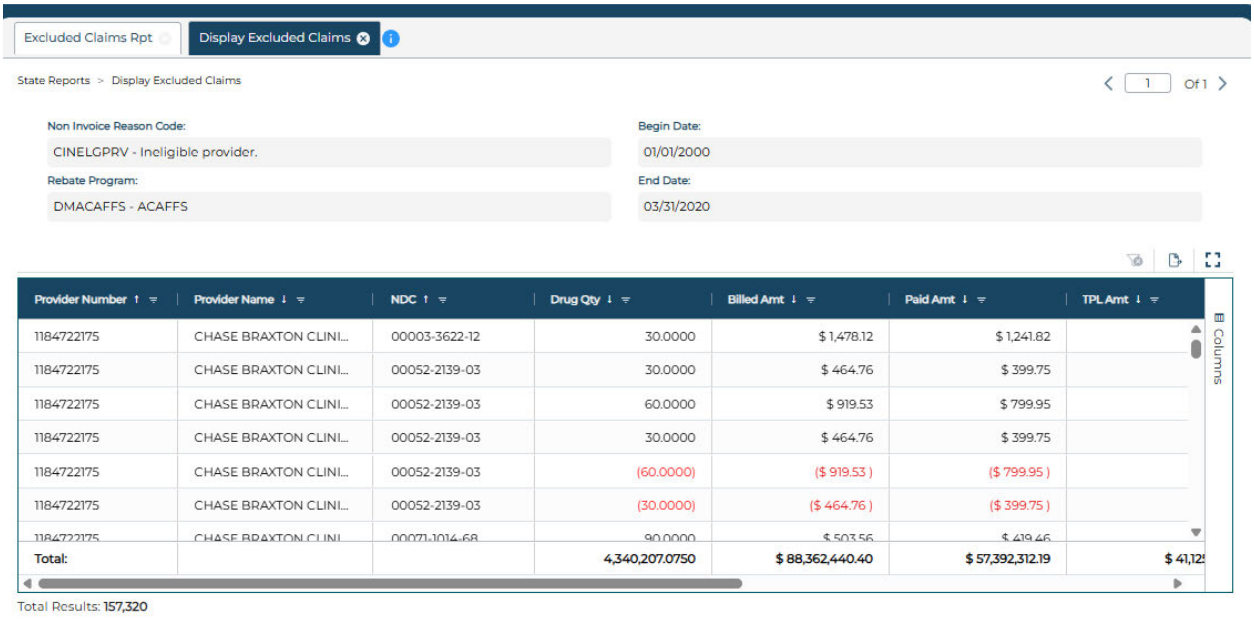

| Quarter | Rebate Program | NDC | Adjustment Date | Adjustment Type | Adjustment Amount | User ID |
|---|---|---|---|---|---|---|
| 4Q2024 | DMACAFFS | 00002-7715-59 | 05/14/2025 | UACM | ($ 30.15 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00002-8222-59 | 05/14/2025 | UACM | ($ 316.43 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00002-8715-01 | 05/14/2025 | UACM | ($ 28.50 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00003-0894-21 | 05/14/2025 | UACM | ($ 1,168.31 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00054-0020-25 | 05/14/2025 | UACM | ($ 32.68 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00054-0021-25 | 05/14/2025 | UACM | ($ 16.73 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00054-0176-13 | 05/14/2025 | UACM | ($ 1.08 ) | ASHWINR |
| **Total** | | | | | **($ 398,749.36 )** | |

Total Results: **9,173**

## Request Window Excluded Claim Report

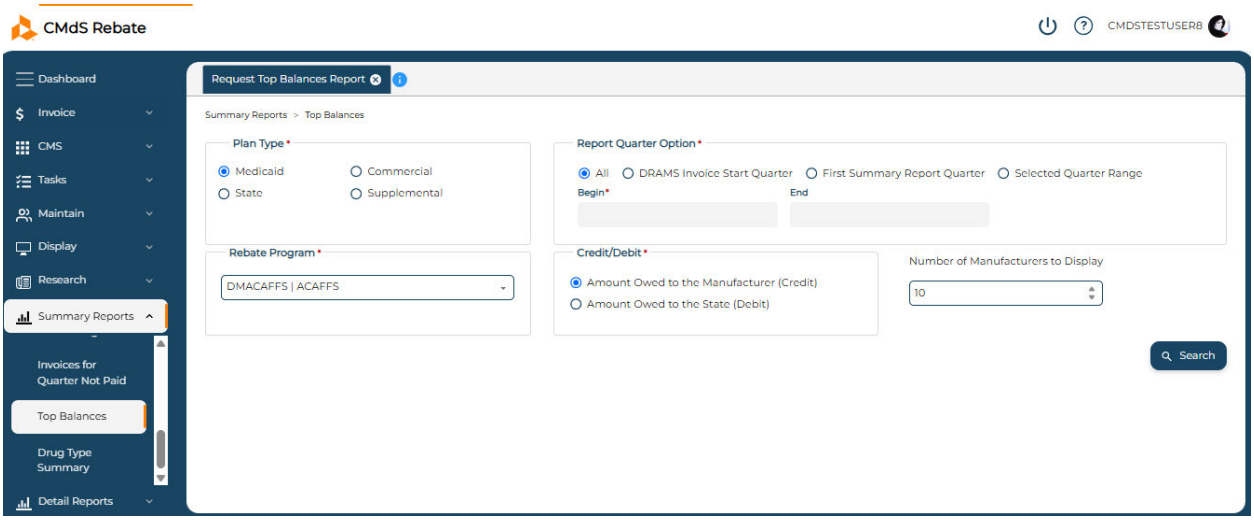



## Output Window

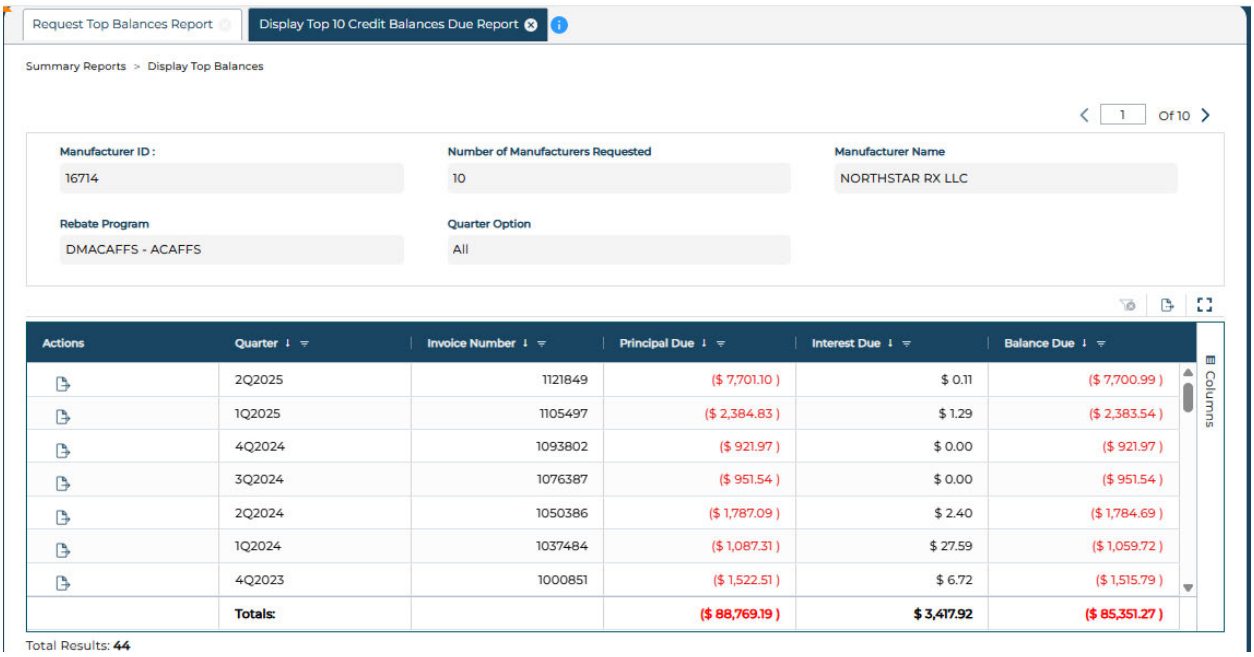



| Provider Number | Provider Name | NDC | Drug Qty | Billed Amt | Paid Amt | TPL Amt |
|---|---|---|---|---|---|---|
| 1184722175 | CHASE BRAXTON CLINI... | 00003-3622-12 | 30.0000 | $ 1,478.12 | $ 1,241.82 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | 30.0000 | $ 464.76 | $ 399.75 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | 60.0000 | $ 919.53 | $ 799.95 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | 30.0000 | $ 464.76 | $ 399.75 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | (60.0000) | ($ 919.53 ) | ($ 799.95 ) | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | (30.0000) | ($ 464.76 ) | ($ 399.75 ) | |
| 1184722175 | CHASE BRAXTON CLINI... | 00071-1014-68 | 90.0000 | $ 503.56 | $ 419.46 | |
| Total: | | | 4,340,207.0750 | $ 88,362,440.40 | $ 57,392,312.19 | $ 41,12 |

## Request Window Top Balances Report



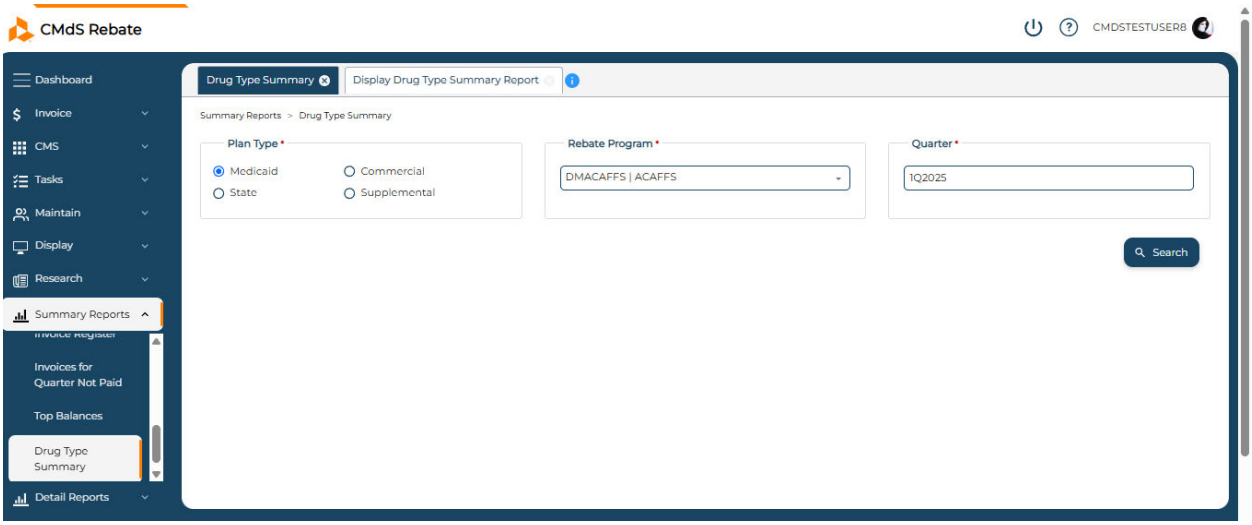

## Output Window



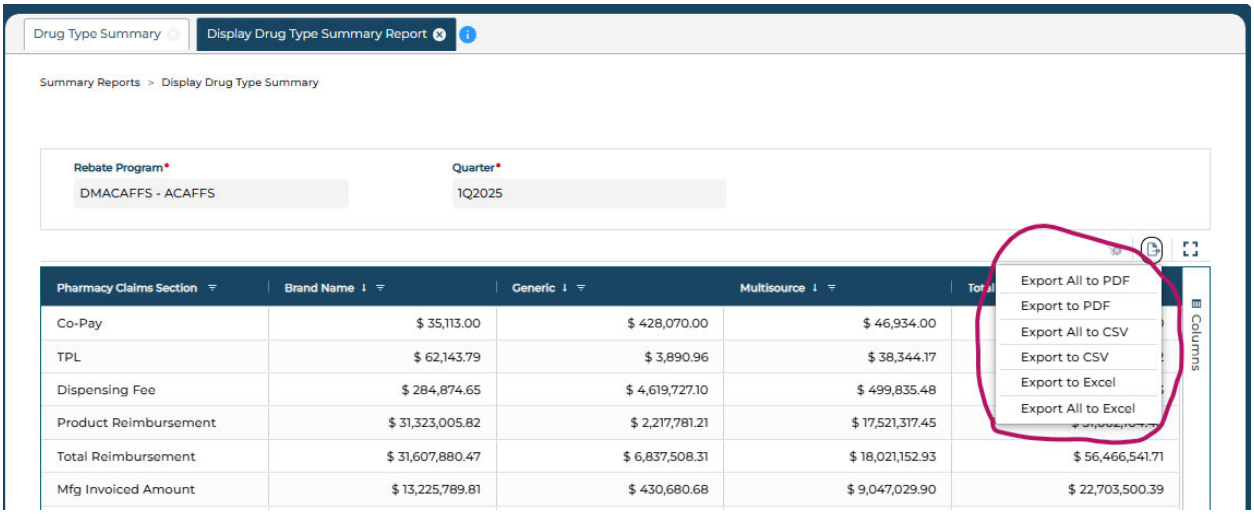

| Actions | Quarter | Invoice Number | Principal Due | Interest Due | Balance Due |
|---|---|---|---|---|---|
| | 2Q2025 | 1121849 | ($ 7,701.10 ) | $ 0.11 | ($ 7,700.99 ) |
| | 1Q2025 | 1105497 | ($ 2,384.83 ) | $ 1.29 | ($ 2,383.54 ) |
| | 4Q2024 | 1093802 | ($ 921.97 ) | $ 0.00 | ($ 921.97 ) |
| | 3Q2024 | 1076387 | ($ 951.54 ) | $ 0.00 | ($ 951.54 ) |
| | 2Q2024 | 1050386 | ($ 1,787.09 ) | $ 2.40 | ($ 1,784.69 ) |
| | 1Q2024 | 1037484 | ($ 1,087.31 ) | $ 27.59 | ($ 1,059.72 ) |
| | 4Q2023 | 1000851 | ($ 1,522.51 ) | $ 6.72 | ($ 1,515.79 ) |
| | **Totals:** | | **($ 88,769.19 )** | **$ 3,417.92** | **($ 85,351.27 )** |

Total Results: **44**

### Request Window Display Drug Type Summary




### Output Window Showing Export Formats as well




| Pharmacy Claims Section | Brand Name | Generic | Multisource | Total |
|---|---|---|---|---|
| Co-Pay | $ 35,113.00 | $ 428,070.00 | $ 46,934.00 | |
| TPL | $ 62,143.79 | $ 3,890.96 | $ 38,344.17 | |
| Dispensing Fee | $ 284,874.65 | $ 4,619,727.10 | $ 499,835.48 | |
| Product Reimbursement | $ 31,323,005.82 | $ 2,217,781.21 | $ 17,521,317.45 | |
| Total Reimbursement | $ 31,607,880.47 | $ 6,837,508.31 | $ 18,021,152.93 | $ 56,466,541.71 |
| Mfg Invoiced Amount | $ 13,225,789.81 | $ 430,680.68 | $ 9,047,029.90 | $ 22,703,500.39 |

**Assumption:** Excel file works for this.

## IVM-51 Quarterly Processing Timeline Report

### *Mock-up: Invoice Cycle Timeline Report (IVM Req. #51)*

RFP requirement: report listing the date the quarterly file was received from CMS, the date it was processed by the vendor, the date invoices were submitted to labelers, and the date invoices were received (downloaded) by labelers.

**Note:** this also requires new data capture – a labeler-download date/time isn't tracked today, and Operations would need to enter the CMS file receipt date. The mock-up below assumes that data becomes available.

### *Request Window (Parameters)*

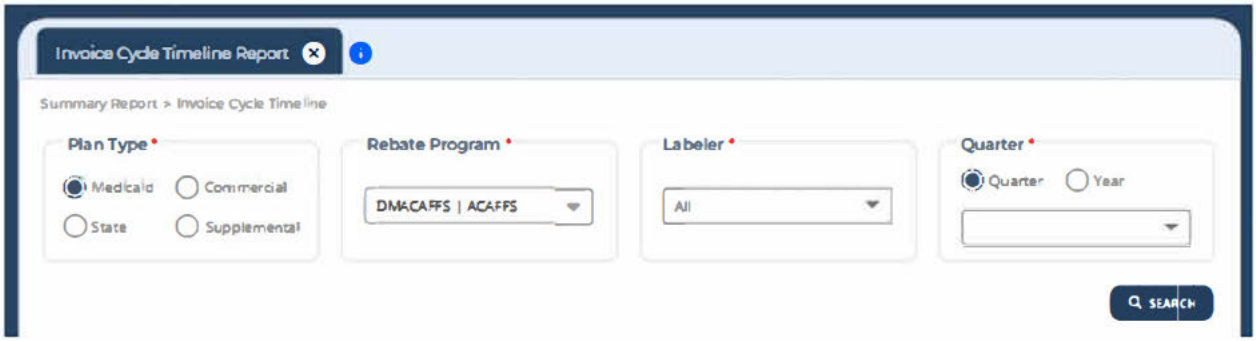
| | |
|---|---|
| **Quarter / Year** | Drop-down (required) |
| **Labeler Name / Labeler ID** | Lookup / type-ahead (optional – blank = all labelers) |
| **Output Format** | On-screen grid, PDF, or Excel export |

### *Output Window – Sample Layout*

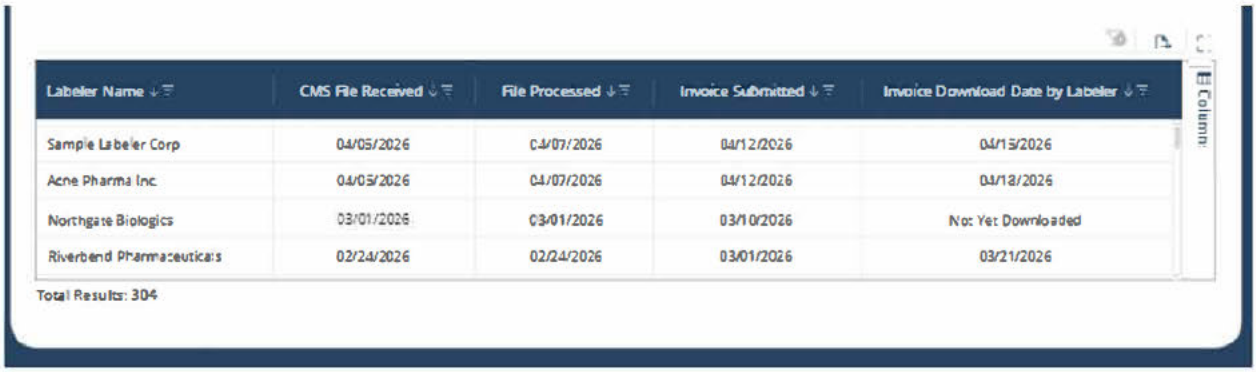
| Labeler Name | CMS File Received | File Processed | Invoice Submitted | Invoice Downloaded by Labeler |
|---|---|---|---|---|
| Sample Labeler Corp | 04/05/2026 | 04/07/2026 | 04/12/2026 | 04/15/2026 |
| Acme Pharma Inc. | 04/05/2026 | 04/07/2026 | 04/12/2026 | 04/18/2026 |
| Northgate Biologics | 04/05/2026 | 04/07/2026 | 04/12/2026 | Not yet downloaded |

***Illustrative data only – for layout purposes.***

## Request Window




## Output Window



# IVM-56 Excess Invoice Exception Report

## *Mock-up: Invoiced Amount Exceeds Medicaid Allowable Report (IVM Req. #56)*

RFP requirement: report listing any drug invoiced for an amount greater than Medicaid paid plus payment from other sources (total Medicaid allowable). No existing report or invoice audit today.

### *Request Window for Invoice Audit (Parameters)*

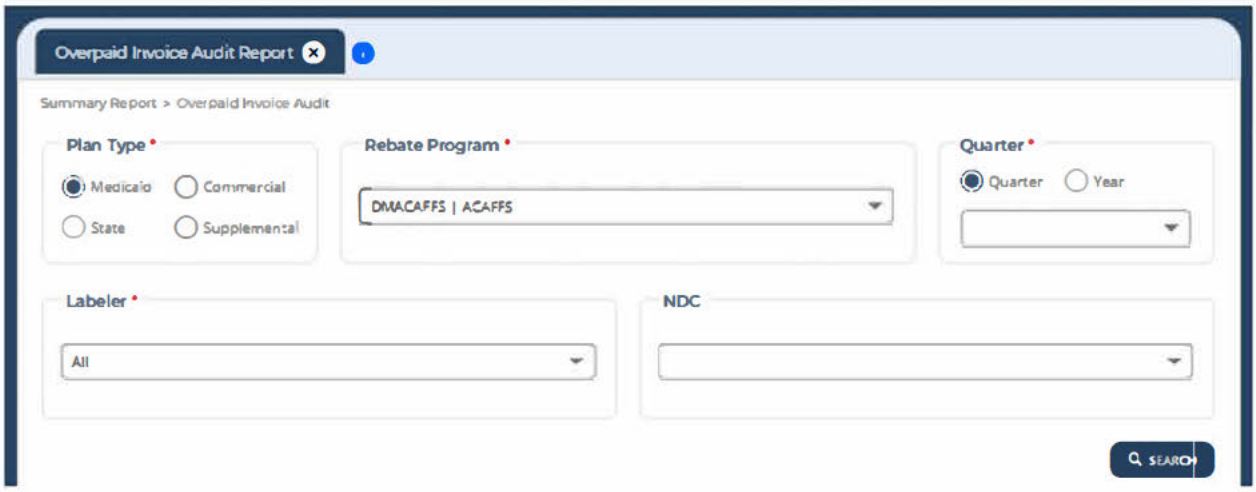
| | |
|---|---|
| **Quarter / Year** | Drop-down (required) |
| **Labeler Name / Labeler ID** | Lookup / type-ahead (optional – blank = all labelers) |
| **NDC** | Optional filter, single NDC or range |
| **Output Format** | On-screen grid, PDF, or Excel export |

### *Output Window for Invoice Audit – Sample Layout*

| NDC | Drug Name | Labeler | Medicaid Paid | Other Source Paid | Total Allowable | Amount Invoiced | Variance |
|---|---|---|---|---|---|---|---|
| 00378-3506-93 | Metformin HCl ER 500mg | Mylan Pharmaceuticals Inc. | $1,200.00 | $50.00 | $1,250.00 | $1,340.00 | $90.00 |
| 68180-0519-01 | Losartan Potassium 50mg | Lupin Pharmaceuticals Inc. | $640.00 | $0.00 | $640.00 | $705.50 | $65.50 |

*Illustrative data only – for layout purposes. "Variance" = Amount Invoiced minus Total Medicaid Allowable; only rows with a positive variance would appear on the live report.*

### Request Window



### Output Window



| NDC | Drug Name | Labeler | Medicaid Paid | Outsourced Amt | Total Allowable | Amount Invoiced | Variance |
|---|---|---|---|---|---|---|---|
| 00378-3506-93 | Metformin HCl ER 500mg | Mylan Pharmaceuticals Inc. | $1,200.00 | $50.00 | $1,250.00 | $1,340.00 | $90.00 |
| 68180-0519-01 | Losartan Potassium 50mg | Lupin Pharmaceuticals Inc. | $640.00 | $0.00 | $640.00 | $705.50 | $65.50 |

Columns

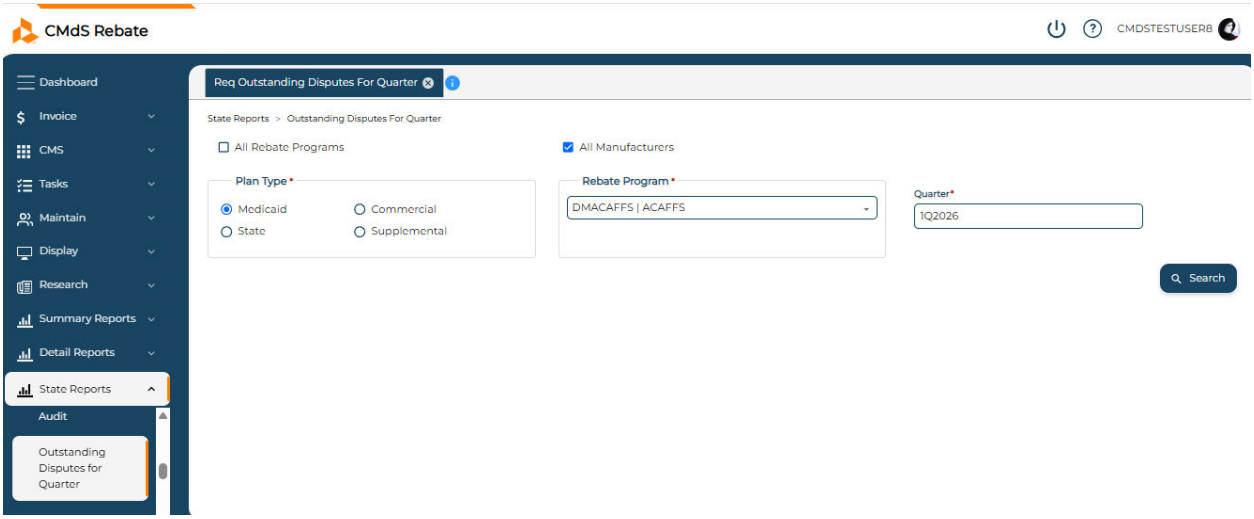
Total Results: 2

## IVM-59 Disputed NDC Claims Report

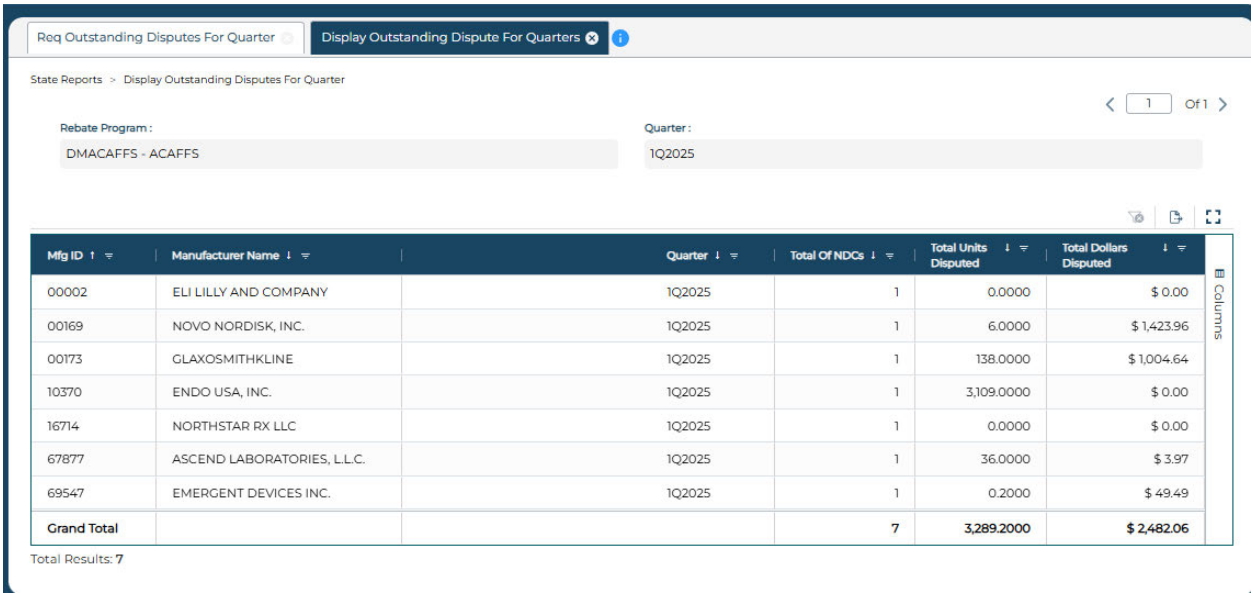
Solution must generate and maintain an electronic file and report of all paid encounter physician and pharmacy claims with disputed products (NDCs) for the rebate quarter under review to facilitate dispute research and resolution. A sample of the report must be submitted with the Technical Response.

**Assumption:** Existing Dispute Reports will support this as long as they create separate rebate programs for pharmacy and medical.

### Request Window Outstanding Disputes for Quarter

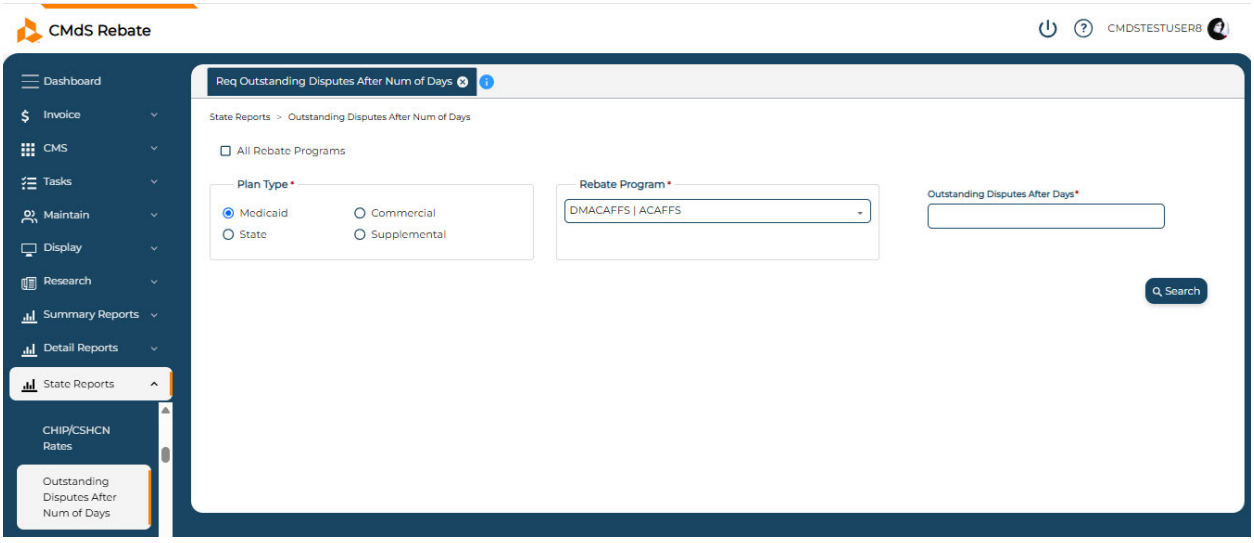


## Output Window

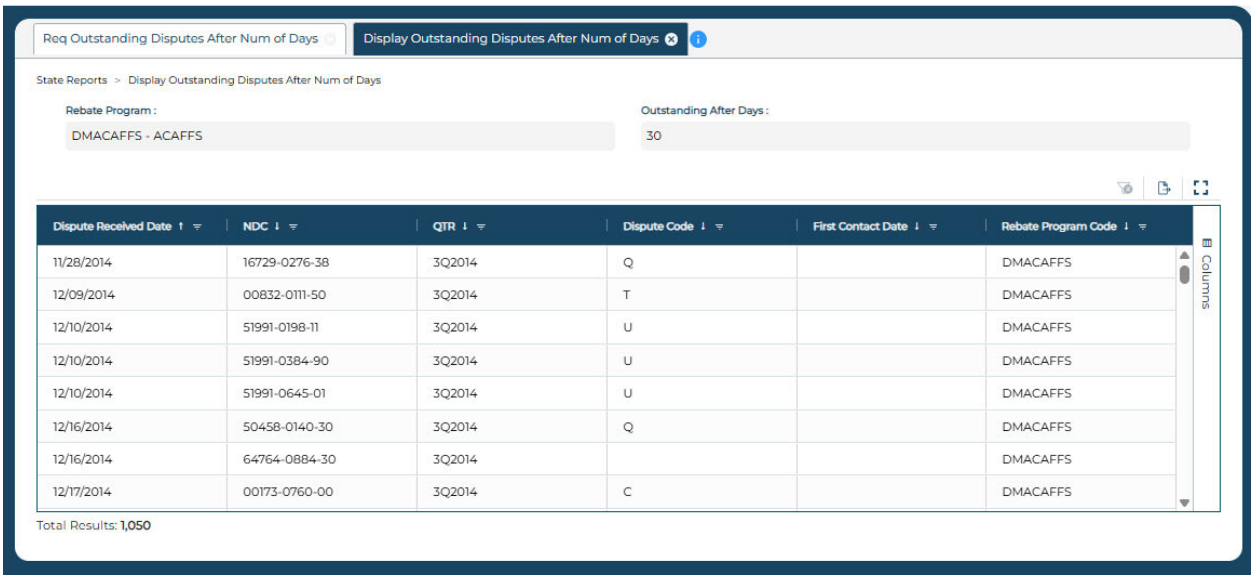



| Mfg ID | Manufacturer Name | Quarter | Total Of NDCs | Total Units Disputed | Total Dollars Disputed |
|---|---|---|---|---|---|
| 00002 | ELI LILLY AND COMPANY | 1Q2025 | 1 | 0.0000 | $ 0.00 |
| 00169 | NOVO NORDISK, INC. | 1Q2025 | 1 | 6.0000 | $ 1,423.96 |
| 00173 | GLAXOSMITHKLINE | 1Q2025 | 1 | 138.0000 | $ 1,004.64 |
| 10370 | ENDO USA, INC. | 1Q2025 | 1 | 3,109.0000 | $ 0.00 |
| 16714 | NORTHSTAR RX LLC | 1Q2025 | 1 | 0.0000 | $ 0.00 |
| 67877 | ASCEND LABORATORIES, L.L.C. | 1Q2025 | 1 | 36.0000 | $ 3.97 |
| 69547 | EMERGENT DEVICES INC. | 1Q2025 | 1 | 0.2000 | $ 49.49 |
| **Grand Total** | | | **7** | **3,289.2000** | **$ 2,482.06** |

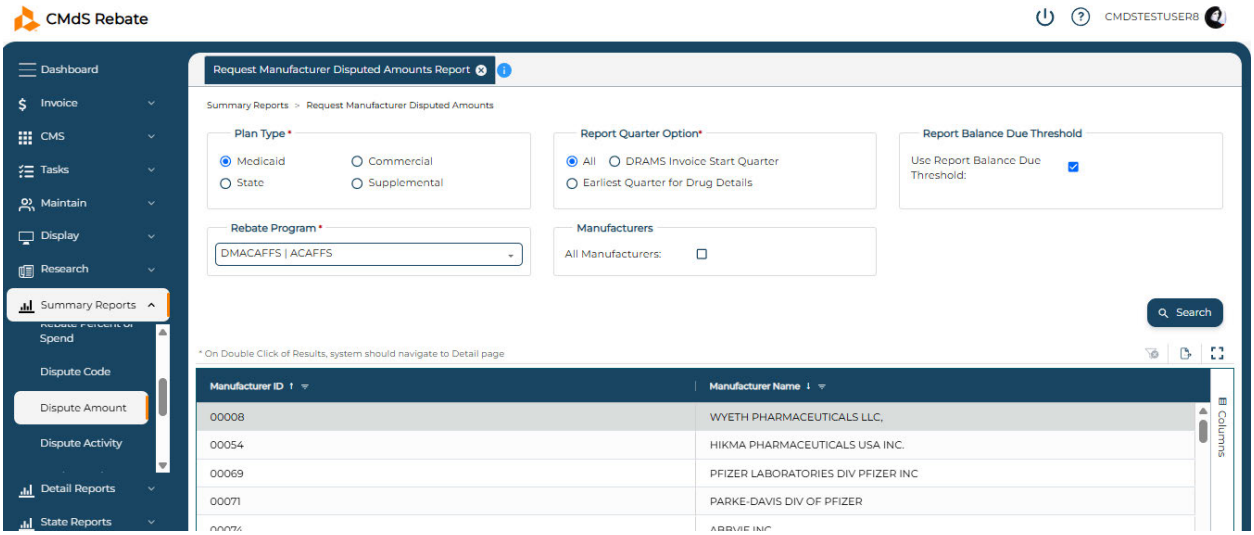
## Request Window Outstanding Disputes after Num of Days



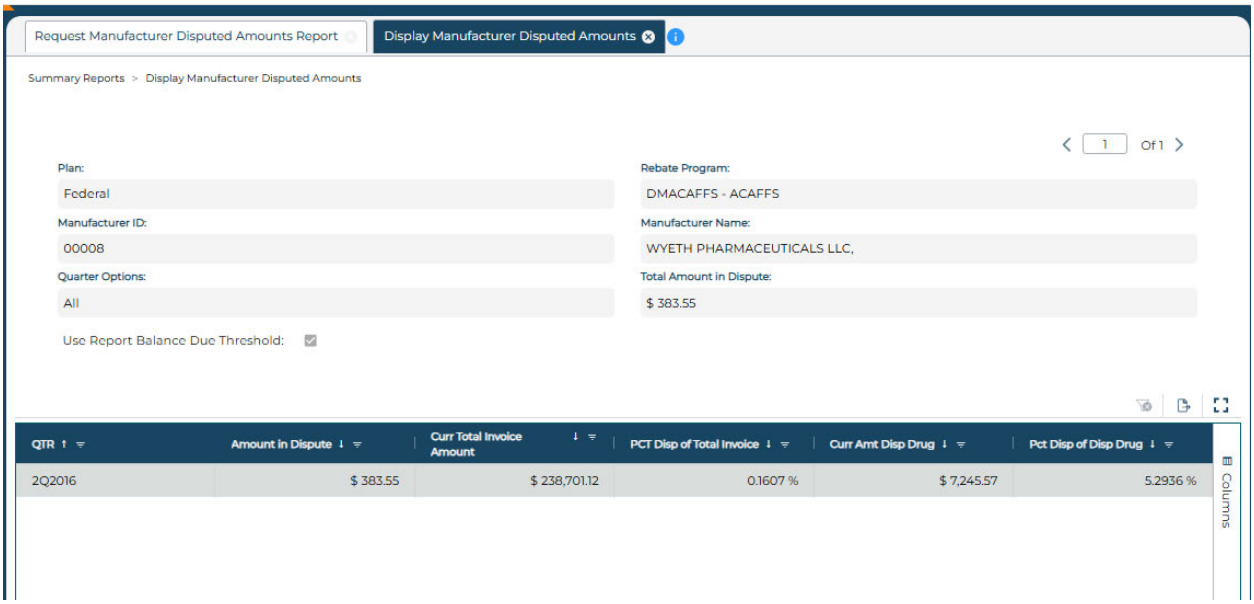
## Output Window



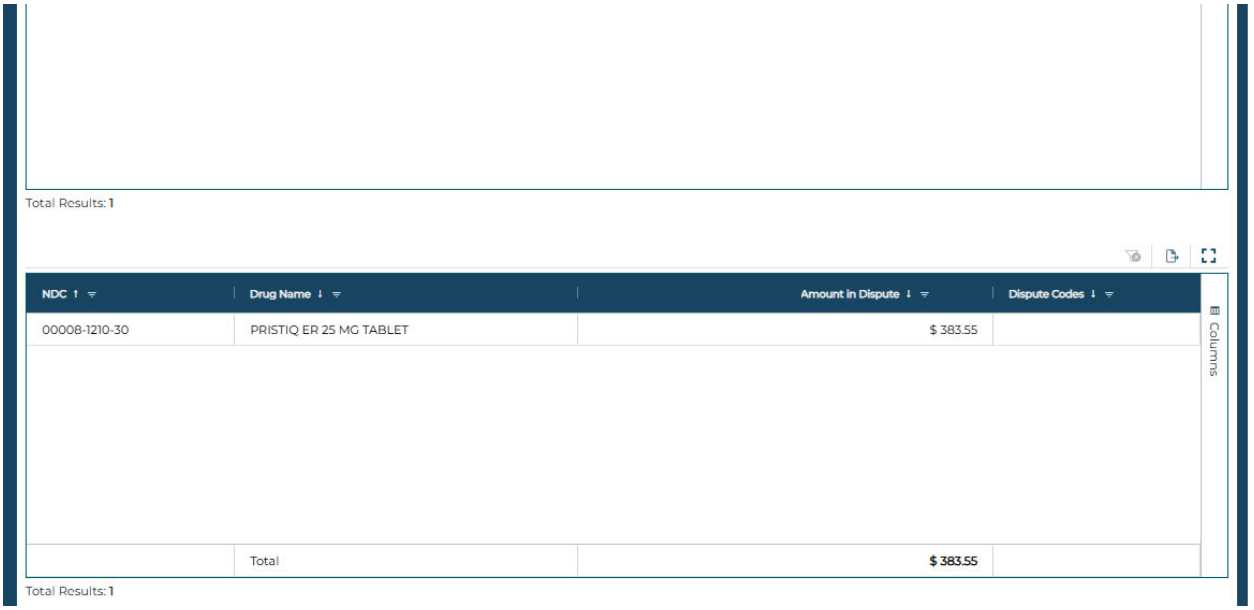

## Request Window Dispute Amount



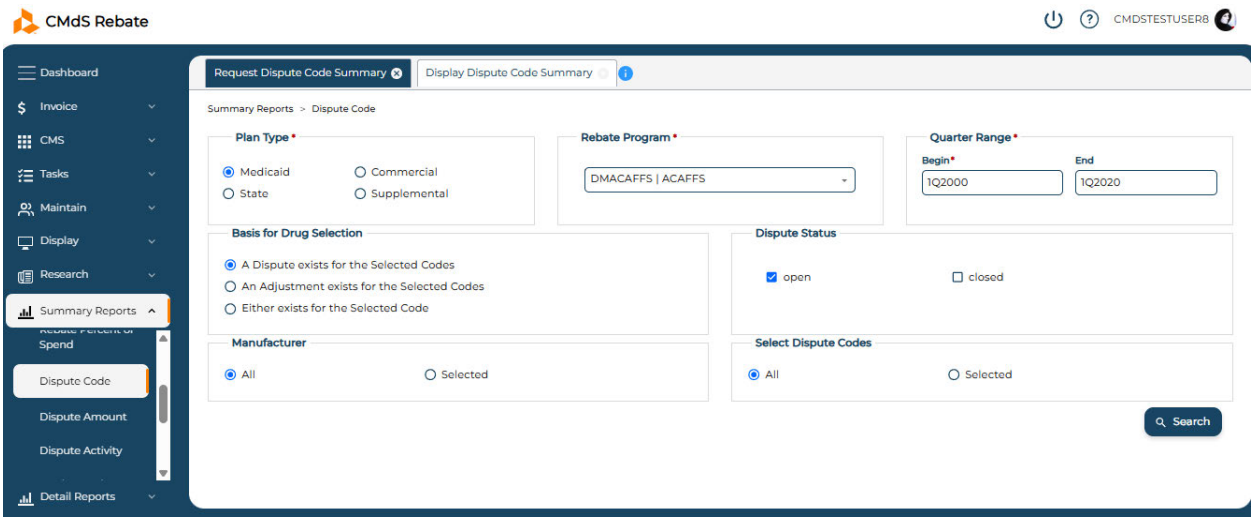
## Output Window



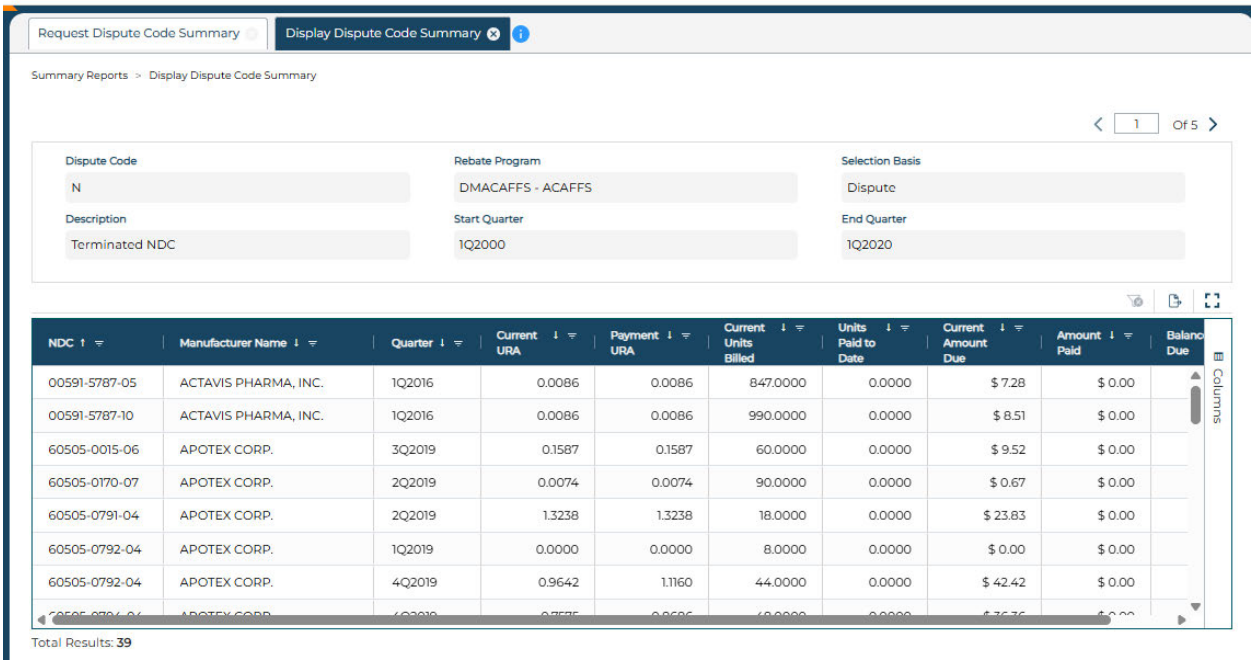

## Continued



## Request Window Dispute Code

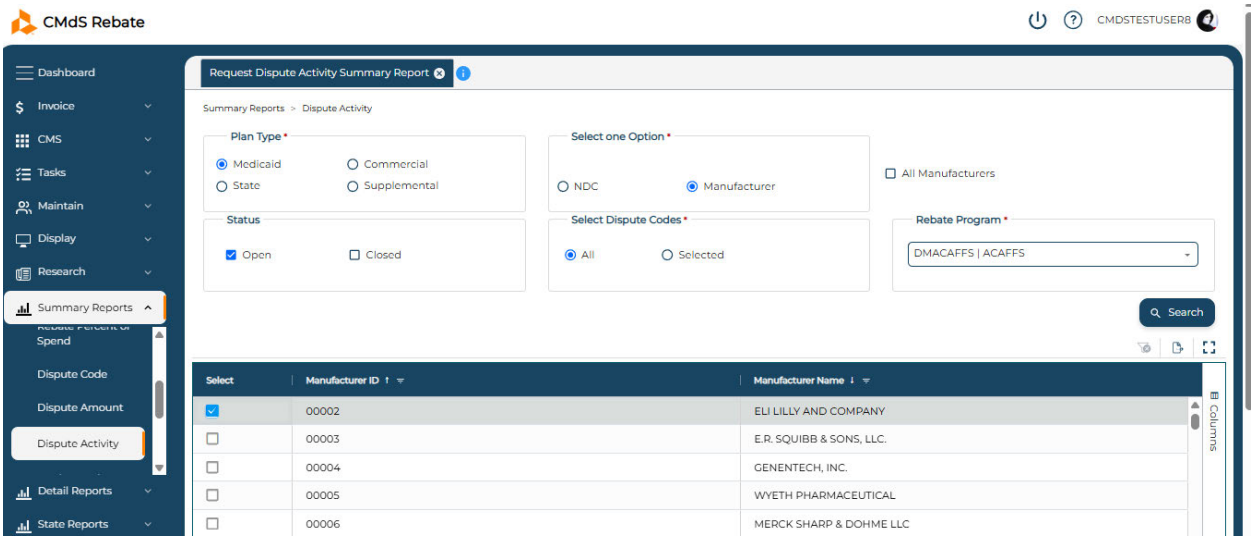



## Output Window

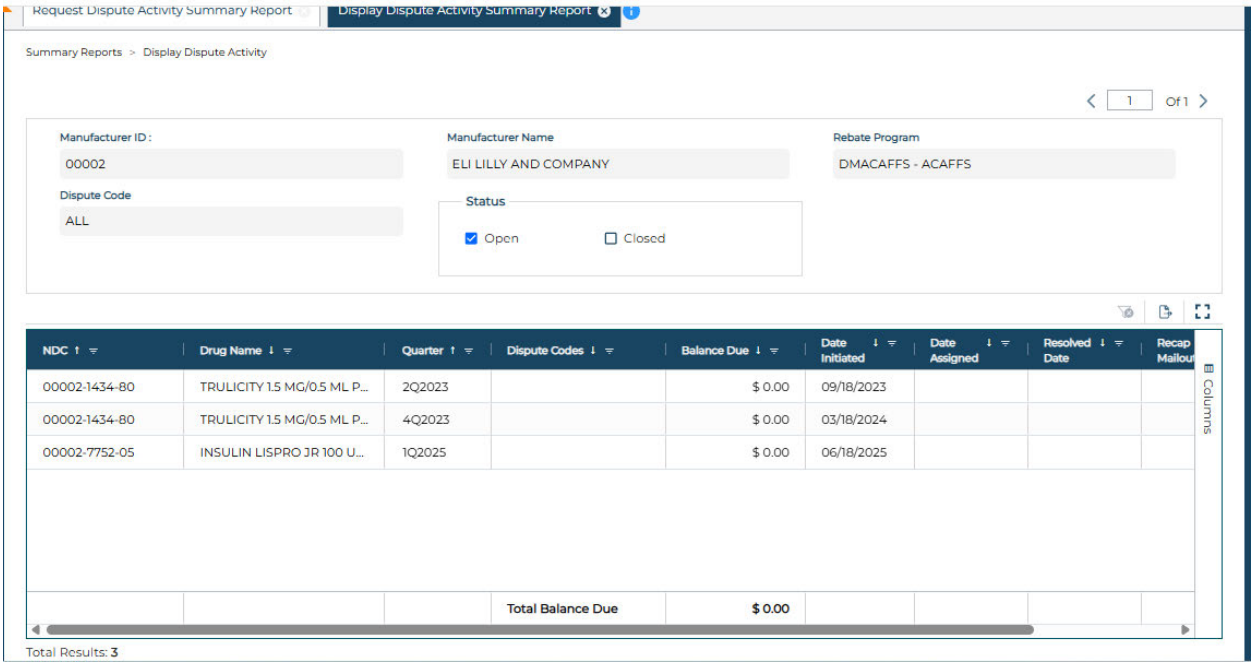



| NDC | Manufacturer Name | Quarter | Current URA | Payment URA | Current Units Billed | Units Paid to Date | Current Amount Due | Amount Paid | Balance Due |
|---|---|---|---|---|---|---|---|---|---|
| 00591-5787-05 | ACTAVIS PHARMA, INC. | 1Q2016 | 0.0086 | 0.0086 | 847.0000 | 0.0000 | $ 7.28 | $ 0.00 | |
| 00591-5787-10 | ACTAVIS PHARMA, INC. | 1Q2016 | 0.0086 | 0.0086 | 990.0000 | 0.0000 | $ 8.51 | $ 0.00 | |
| 60505-0015-06 | APOTEX CORP. | 3Q2019 | 0.1587 | 0.1587 | 60.0000 | 0.0000 | $ 9.52 | $ 0.00 | |
| 60505-0170-07 | APOTEX CORP. | 2Q2019 | 0.0074 | 0.0074 | 90.0000 | 0.0000 | $ 0.67 | $ 0.00 | |
| 60505-0791-04 | APOTEX CORP. | 2Q2019 | 1.3238 | 1.3238 | 18.0000 | 0.0000 | $ 23.83 | $ 0.00 | |
| 60505-0792-04 | APOTEX CORP. | 1Q2019 | 0.0000 | 0.0000 | 8.0000 | 0.0000 | $ 0.00 | $ 0.00 | |
| 60505-0792-04 | APOTEX CORP. | 4Q2019 | 0.9642 | 1.1160 | 44.0000 | 0.0000 | $ 42.42 | $ 0.00 | |

## Request Window Dispute Activity




## Output Window

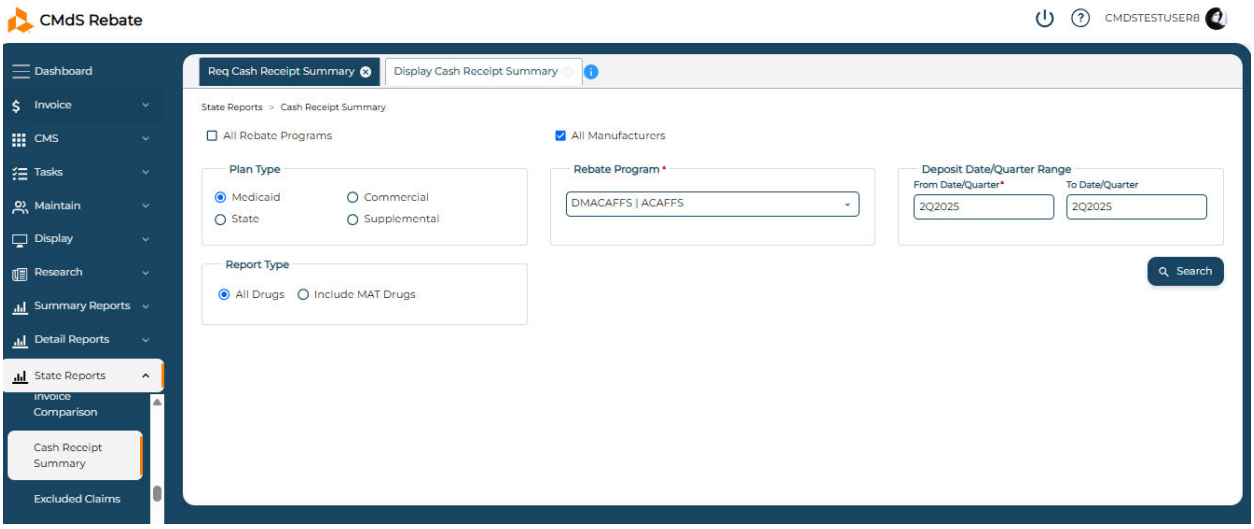


## IVM-72 Reporting Capability Samples

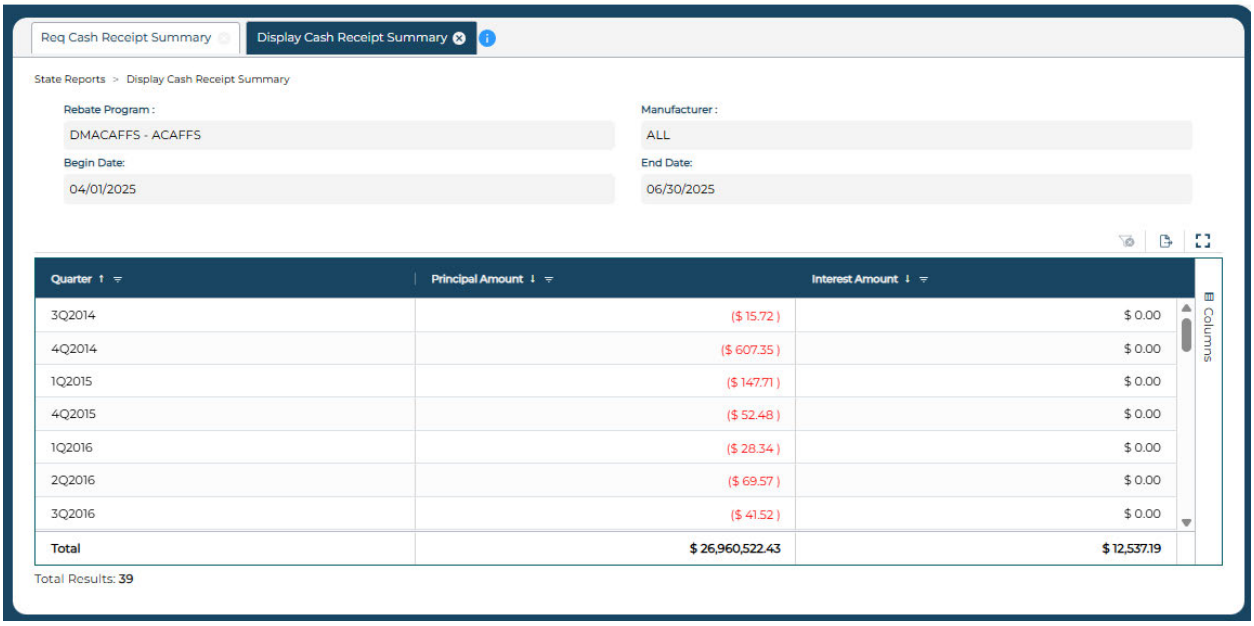
DHHS must meet all federal reporting requirements, as well as those imposed by Nebraska regulations and policies. The MDR solution must have the flexibility to provide reporting for multiple perspectives: e.g. state staff, providers, labelers, participants, etc. Sample reports must be provided with the proposal and will be finalized after reviews with DHHS to determine what additional reporting may be required to meet DHHS needs. Reporting capabilities need to be flexible enough for printing, transfer via multiple output formats and methods, and be customizable by the end user to meet that user's individual needs.

*DHHS reserves the right to add additional reports, change reporting requirements and request on-demand reports as deemed necessary. All reporting must be available in a format that easily allows the data to be imported into state data warehouses and decision support systems.

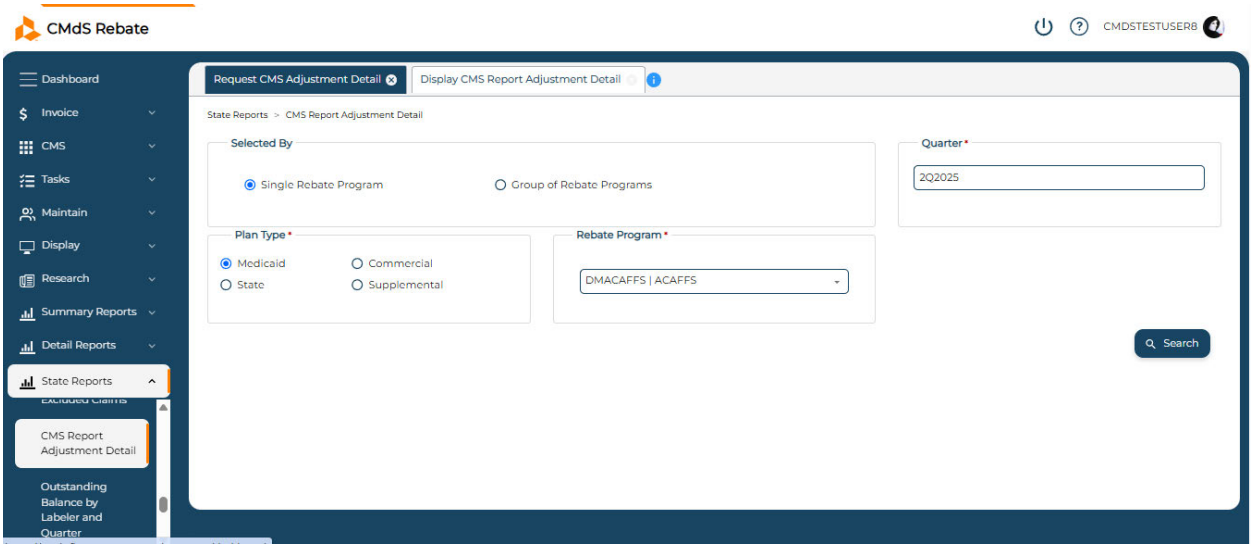
### Request Window Cash Receipt Summary



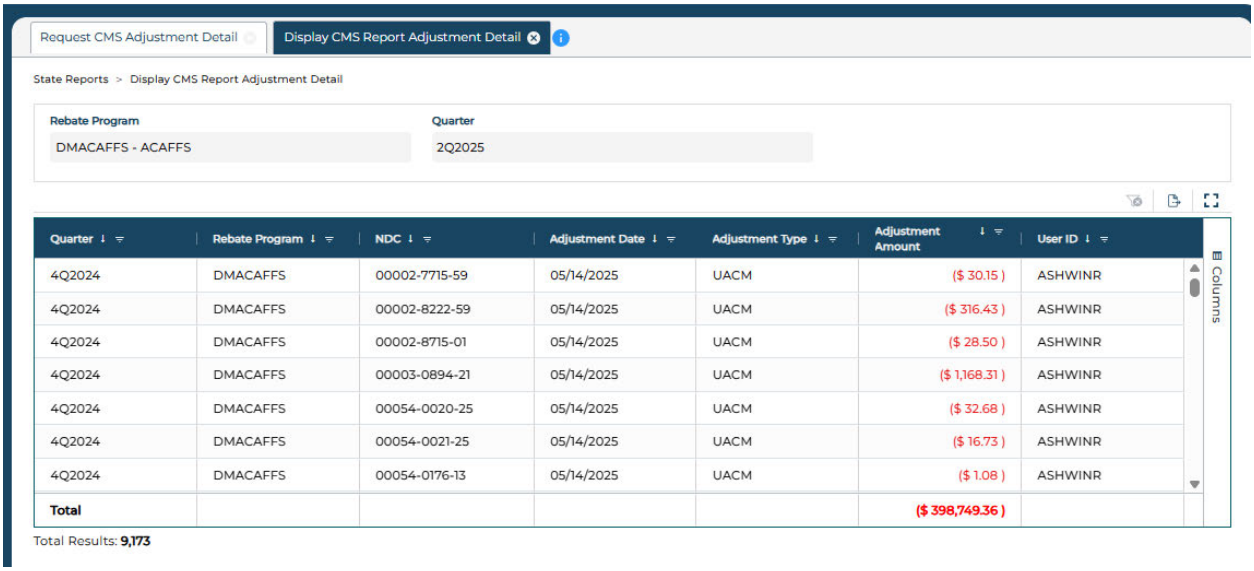

### Output Window



## Request Window CMS Report Adjustment Detail



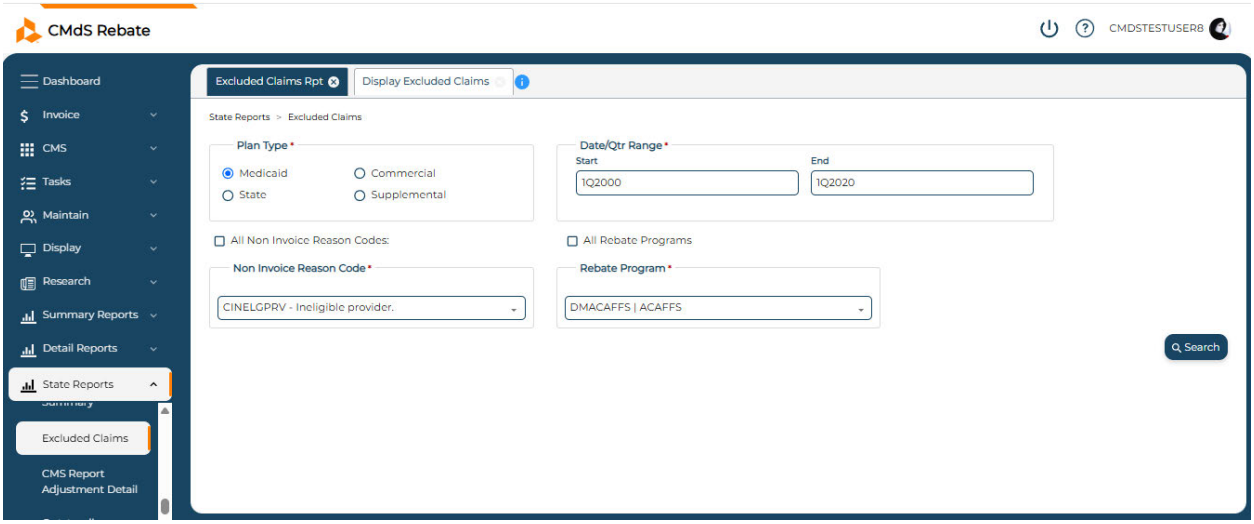

## Output Window



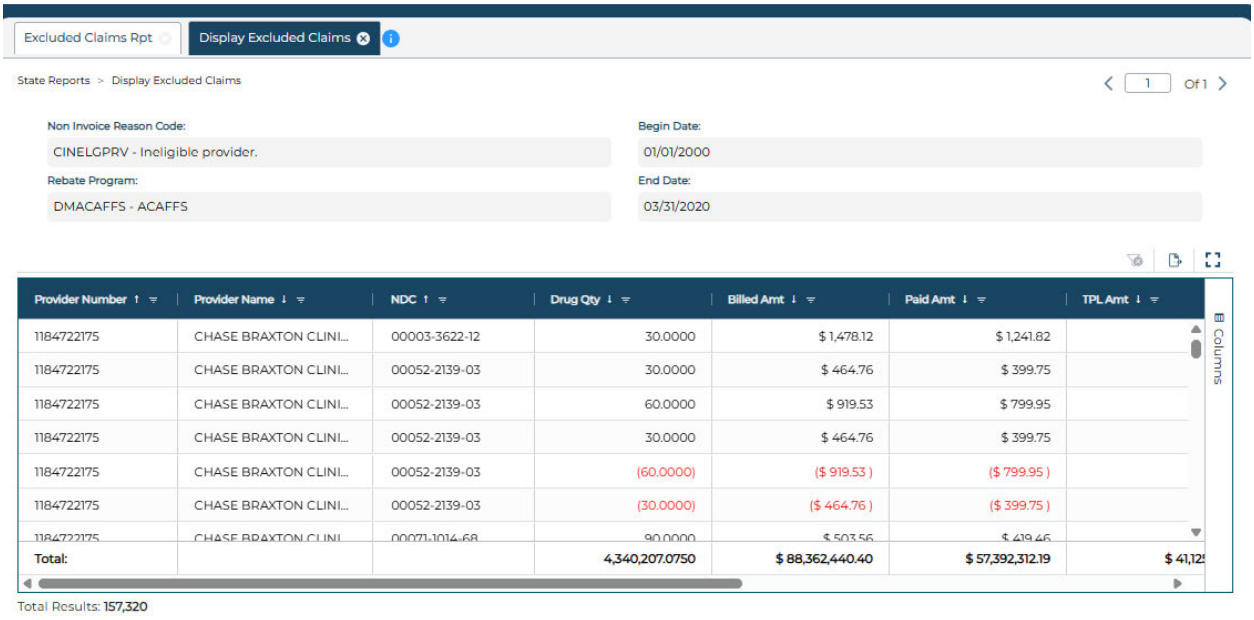

| Quarter | Rebate Program | NDC | Adjustment Date | Adjustment Type | Adjustment Amount | User ID |
|---|---|---|---|---|---|---|
| 4Q2024 | DMACAFFS | 00002-7715-59 | 05/14/2025 | UACM | ($ 30.15 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00002-8222-59 | 05/14/2025 | UACM | ($ 316.43 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00002-8715-01 | 05/14/2025 | UACM | ($ 28.50 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00003-0894-21 | 05/14/2025 | UACM | ($ 1,168.31 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00054-0020-25 | 05/14/2025 | UACM | ($ 32.68 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00054-0021-25 | 05/14/2025 | UACM | ($ 16.73 ) | ASHWINR |
| 4Q2024 | DMACAFFS | 00054-0176-13 | 05/14/2025 | UACM | ($ 1.08 ) | ASHWINR |
| **Total** | | | | | **($ 398,749.36 )** | |

Total Results: **9,173**

## Request Window Excluded Claim Report

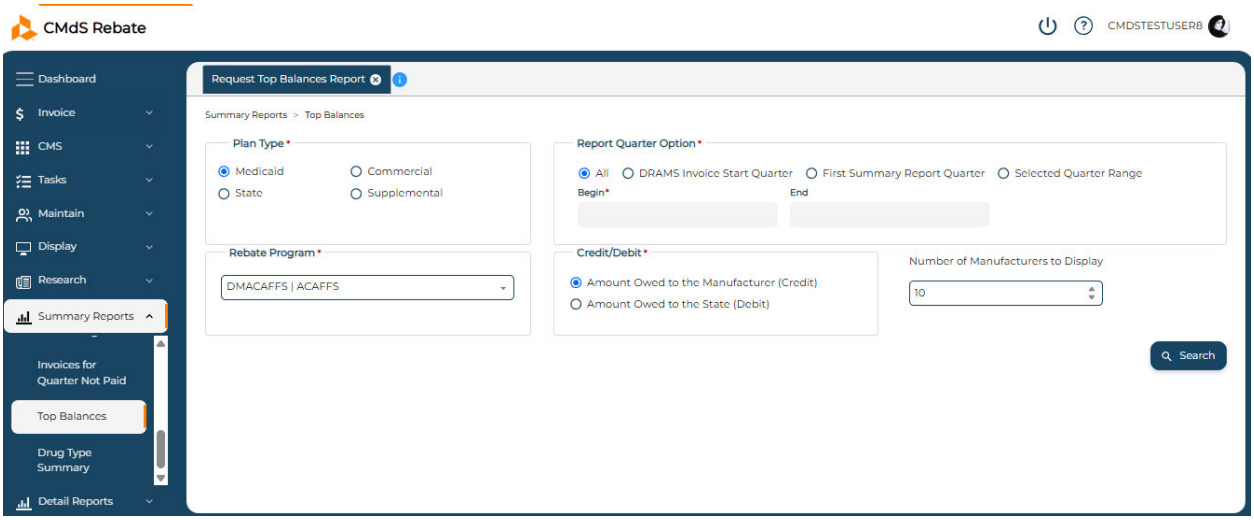



## Output Window

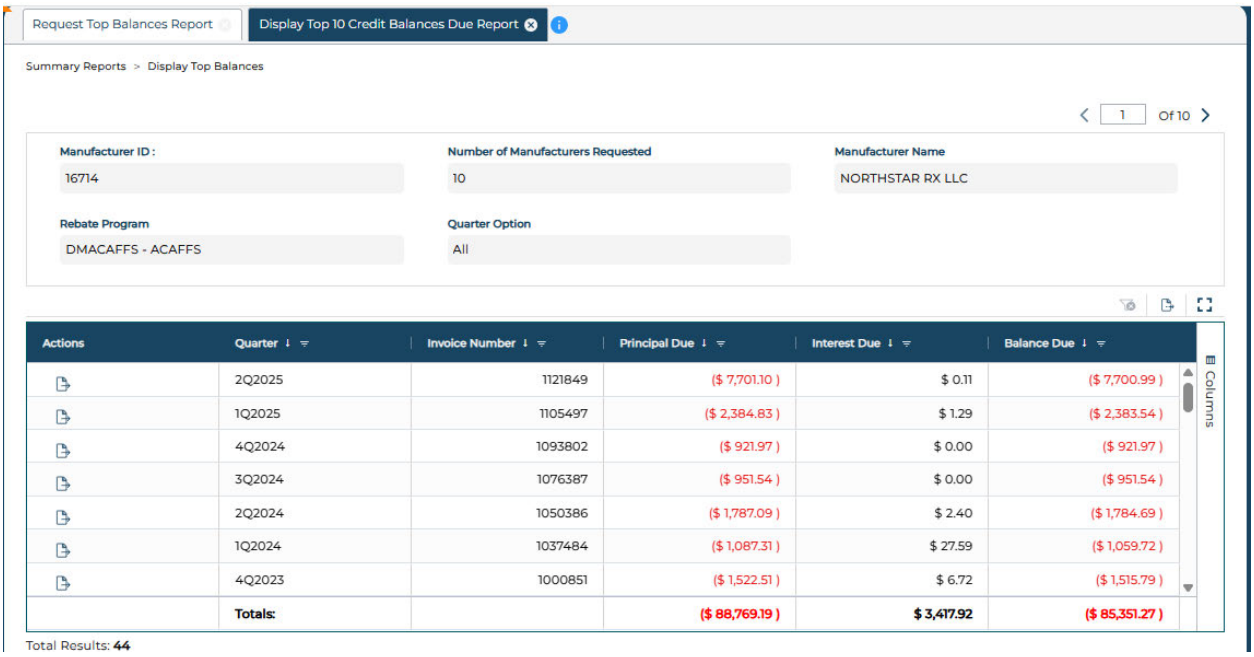



| Provider Number | Provider Name | NDC | Drug Qty | Billed Amt | Paid Amt | TPL Amt |
|---|---|---|---|---|---|---|
| 1184722175 | CHASE BRAXTON CLINI... | 00003-3622-12 | 30.0000 | $ 1,478.12 | $ 1,241.82 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | 30.0000 | $ 464.76 | $ 399.75 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | 60.0000 | $ 919.53 | $ 799.95 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | 30.0000 | $ 464.76 | $ 399.75 | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | (60.0000) | ($ 919.53 ) | ($ 799.95 ) | |
| 1184722175 | CHASE BRAXTON CLINI... | 00052-2139-03 | (30.0000) | ($ 464.76 ) | ($ 399.75 ) | |
| 1184722175 | CHASE BRAXTON CLINI... | 00071-1014-68 | 90.0000 | $ 503.56 | $ 419.46 | |
| Total: | | | 4,340,207.0750 | $ 88,362,440.40 | $ 57,392,312.19 | $ 41,12 |

## Request Window Top Balances Report:



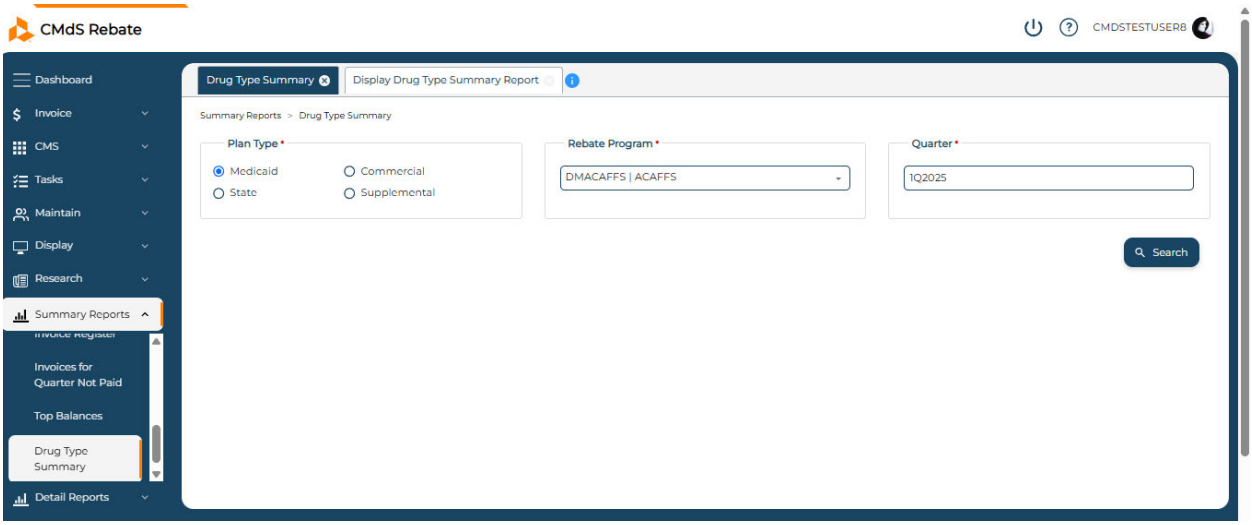

## Output Window



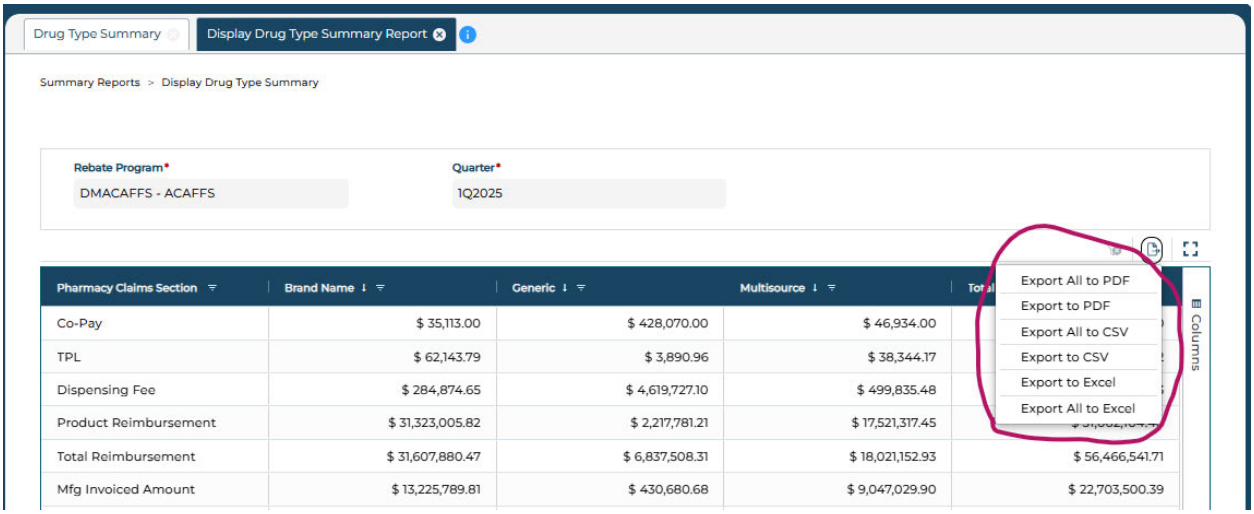

| Actions | Quarter | Invoice Number | Principal Due | Interest Due | Balance Due |
|---|---|---|---|---|---|
| | 2Q2025 | 1121849 | ($ 7,701.10 ) | $ 0.11 | ($ 7,700.99 ) |
| | 1Q2025 | 1105497 | ($ 2,384.83 ) | $ 1.29 | ($ 2,383.54 ) |
| | 4Q2024 | 1093802 | ($ 921.97 ) | $ 0.00 | ($ 921.97 ) |
| | 3Q2024 | 1076387 | ($ 951.54 ) | $ 0.00 | ($ 951.54 ) |
| | 2Q2024 | 1050386 | ($ 1,787.09 ) | $ 2.40 | ($ 1,784.69 ) |
| | 1Q2024 | 1037484 | ($ 1,087.31 ) | $ 27.59 | ($ 1,059.72 ) |
| | 4Q2023 | 1000851 | ($ 1,522.51 ) | $ 6.72 | ($ 1,515.79 ) |
| | **Totals:** | | **($ 88,769.19 )** | **$ 3,417.92** | **($ 85,351.27 )** |

Total Results: **44**

## Request Window Display Drug Type Summary:




## Output Window showing export formats as well:




**Assumption:** Excel file works for this.

## VI.A.2.II.c.2 Customer Support, Documentation, and Training (CDT) Report Samples

Conduent's CDT-06 Training Plan is provided on the following pages.

Conduent State Healthcare, LLC

CONDUENT

# Medicaid Drug Rebate System (MDR) for the State of Nebraska, Department of Health and Human Services (DHHS)

# Training Plan

Version 1.0 (Proposal Sample)
Revision Date: July 2026

Conduent Confidential

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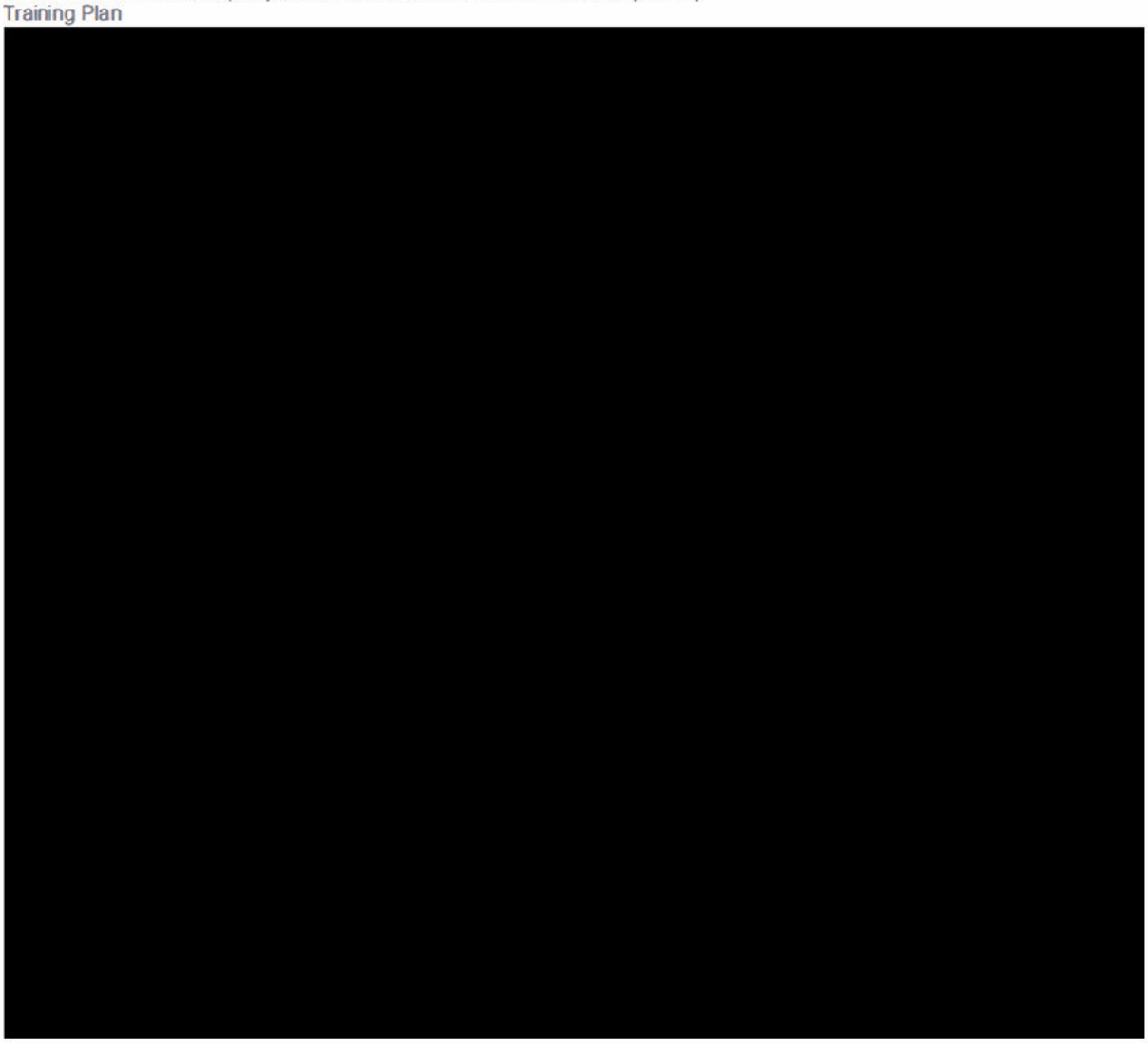
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### VI.A.2.II.c.3 Project Management and Implementation Report Samples

Conduent's PMI-02 Project Management Plan (PMP) and PMI-10 Project Work Plan (PWP) are provided on the following pages.

CONDUENT

# Medicaid Drug Rebate System (MDR) for the State of Nebraska, Department of Health and Human Services (DHHS)

# Project Management Plan

Version 1.0 (Proposal Sample)
Revision Date: July 2026

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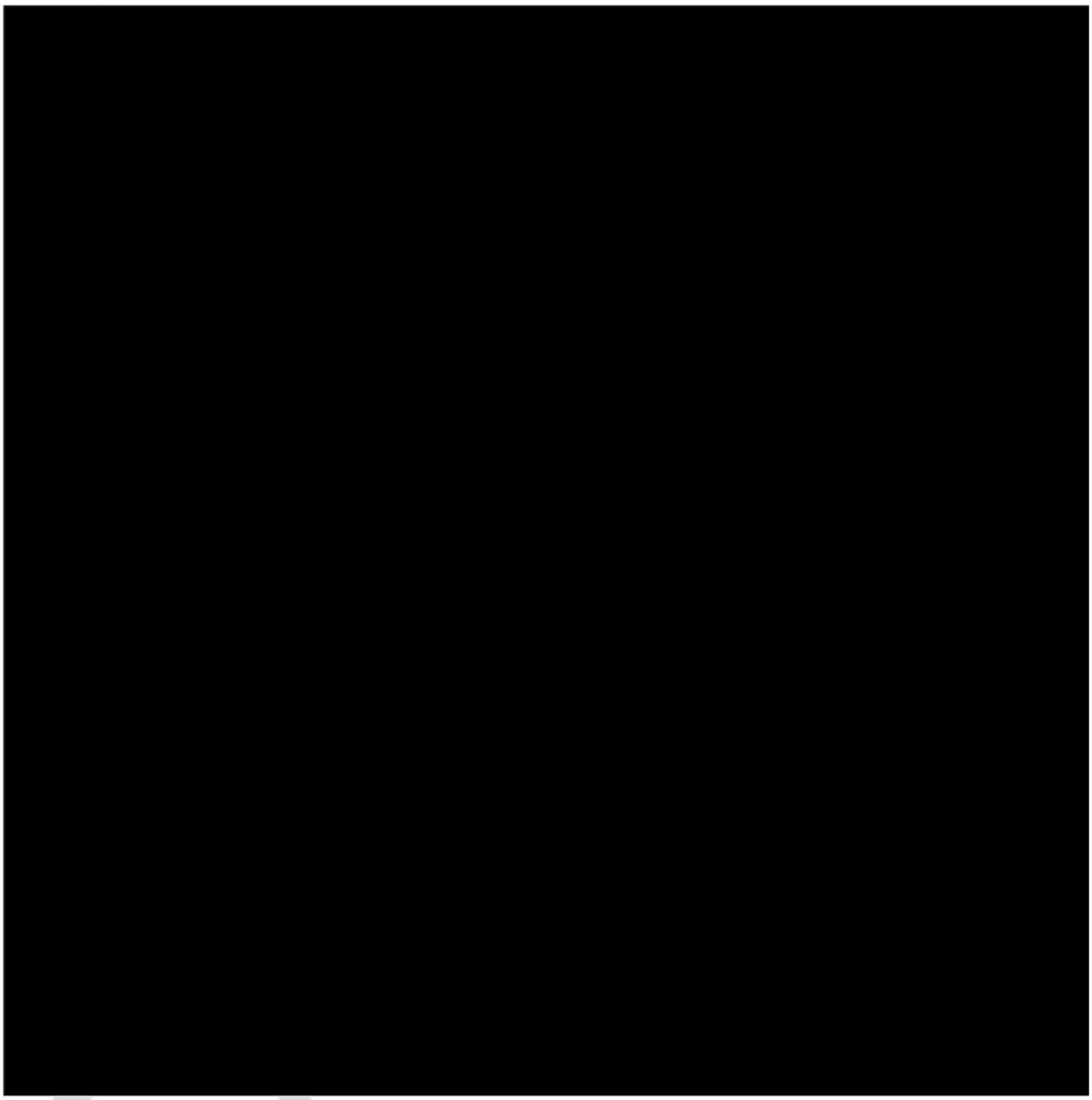
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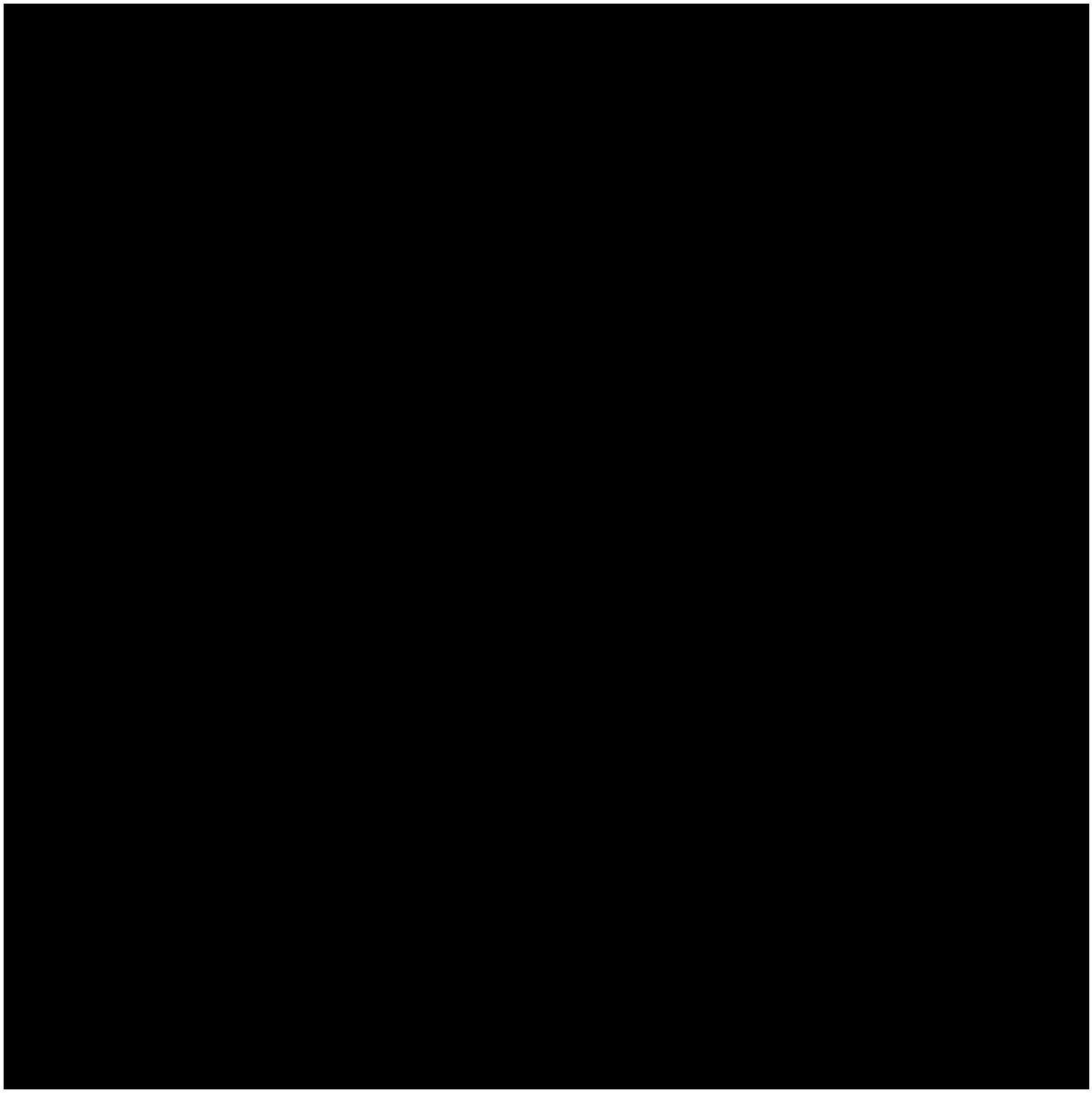
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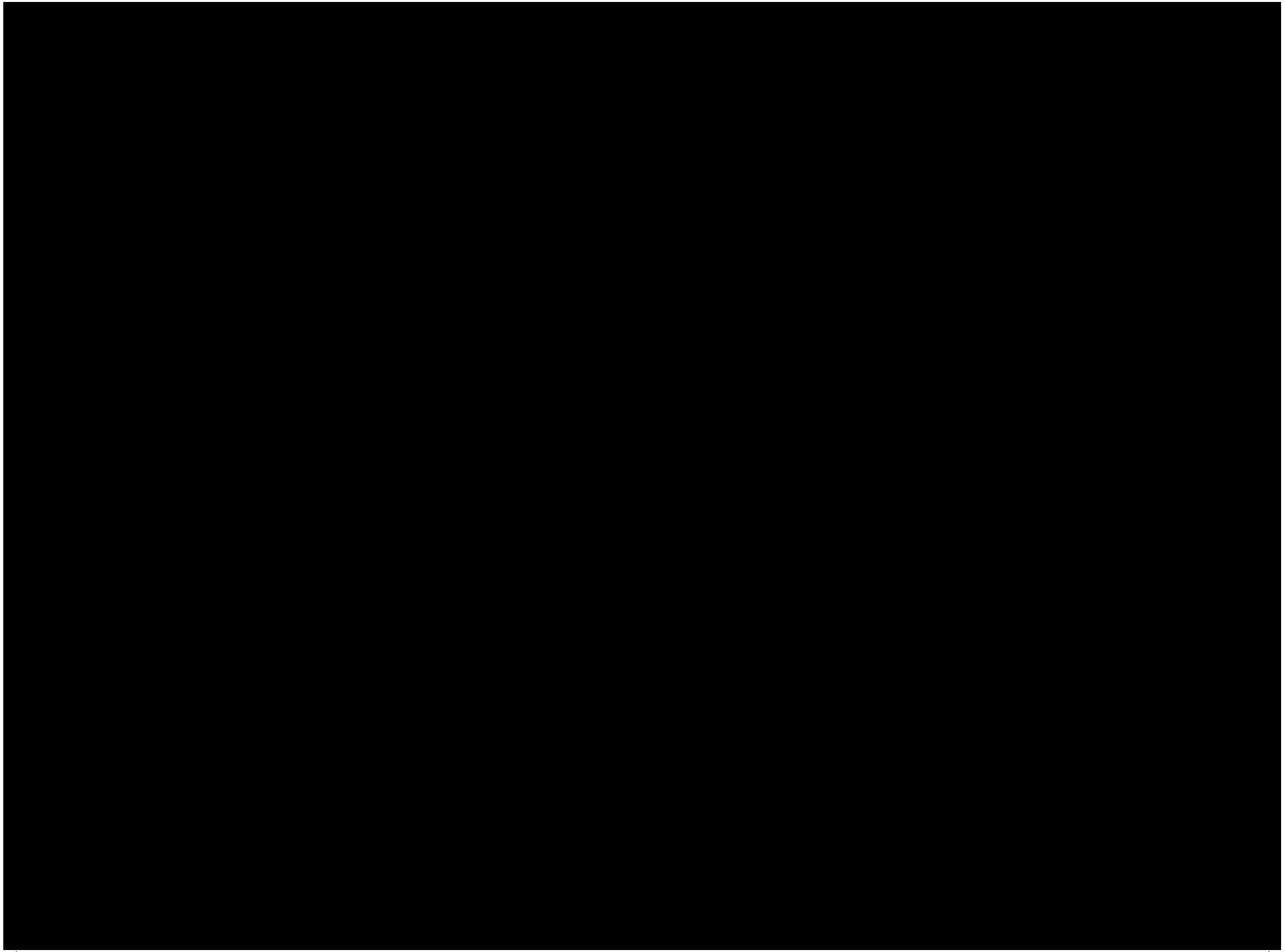
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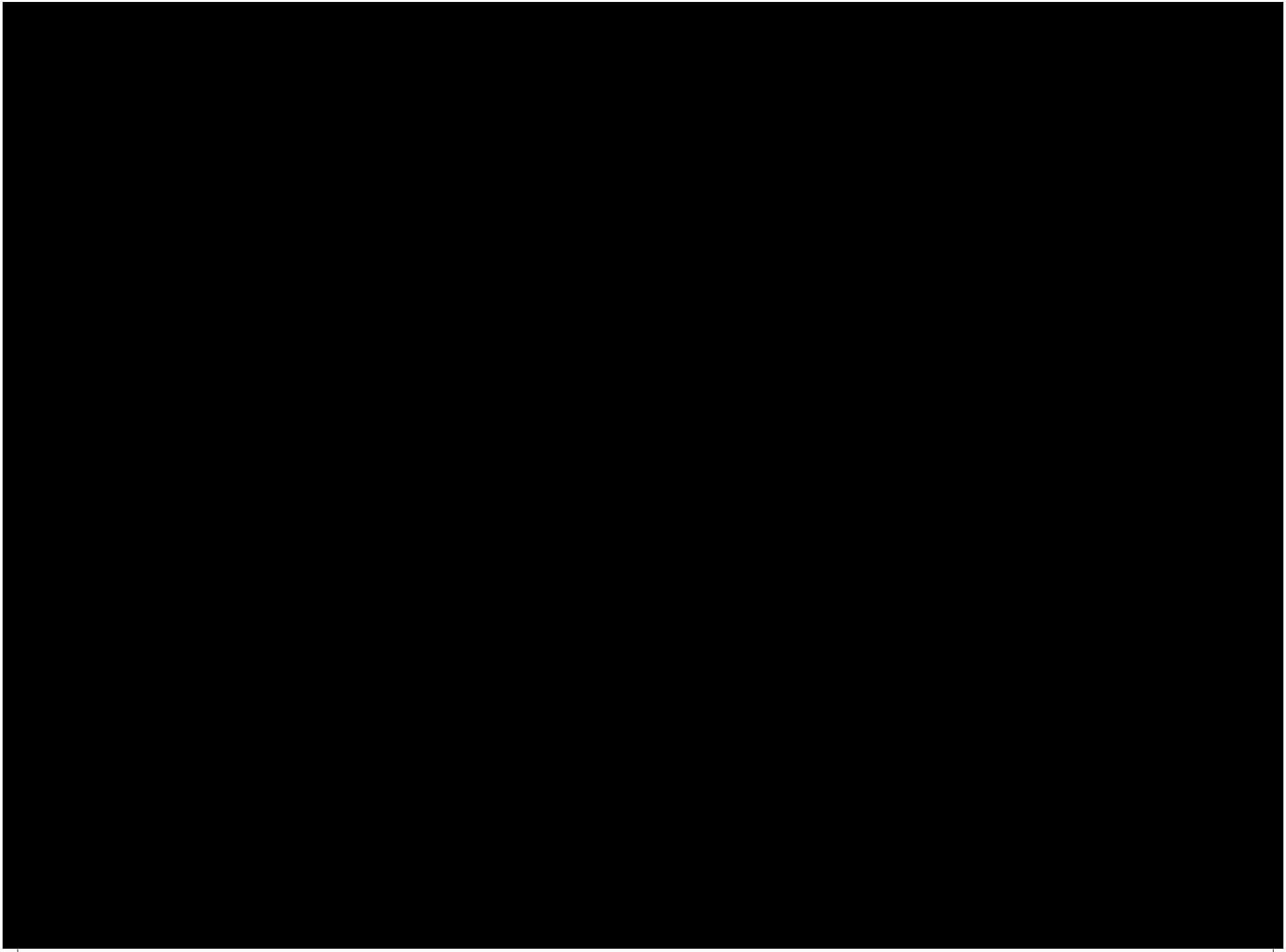
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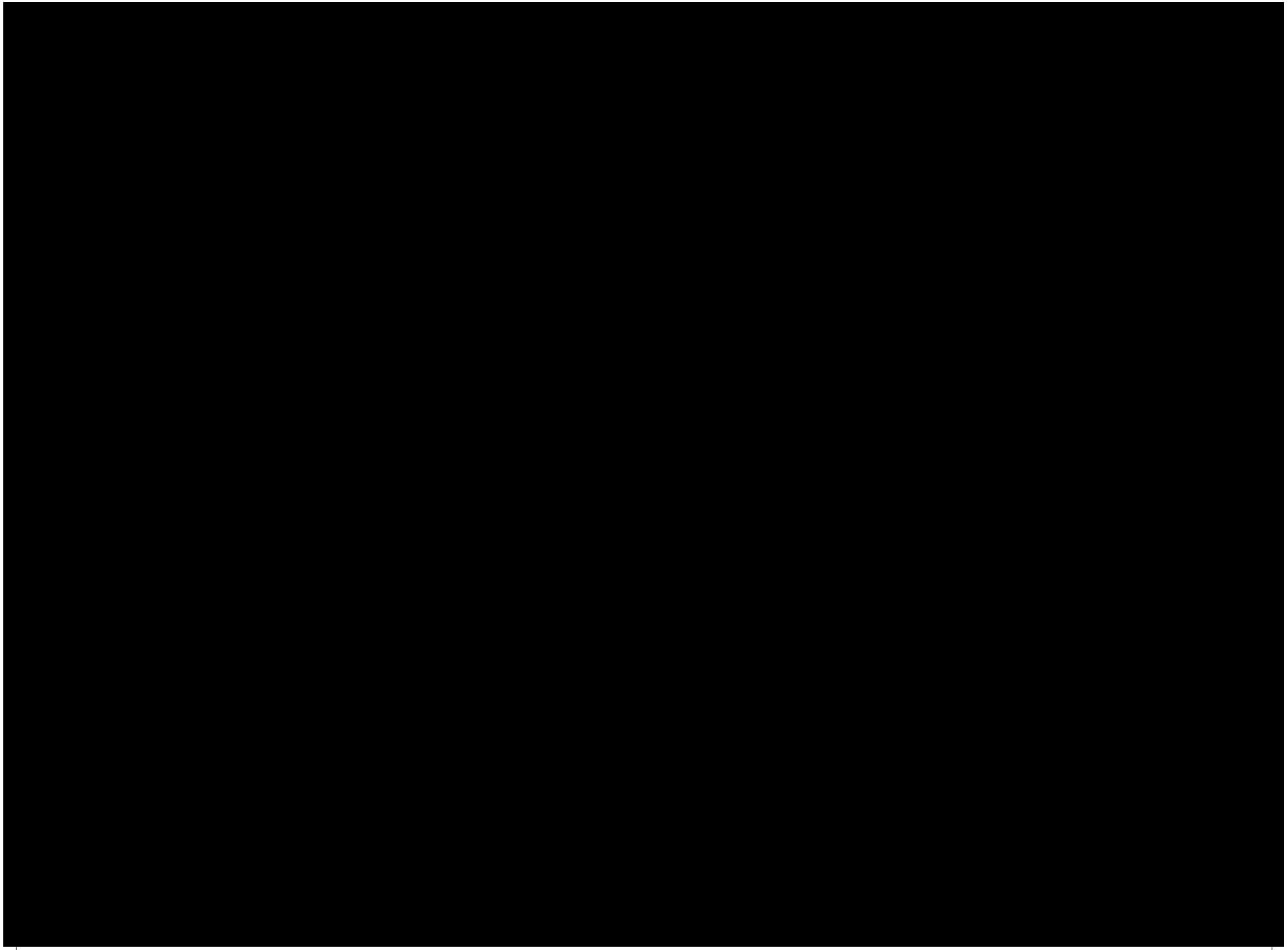
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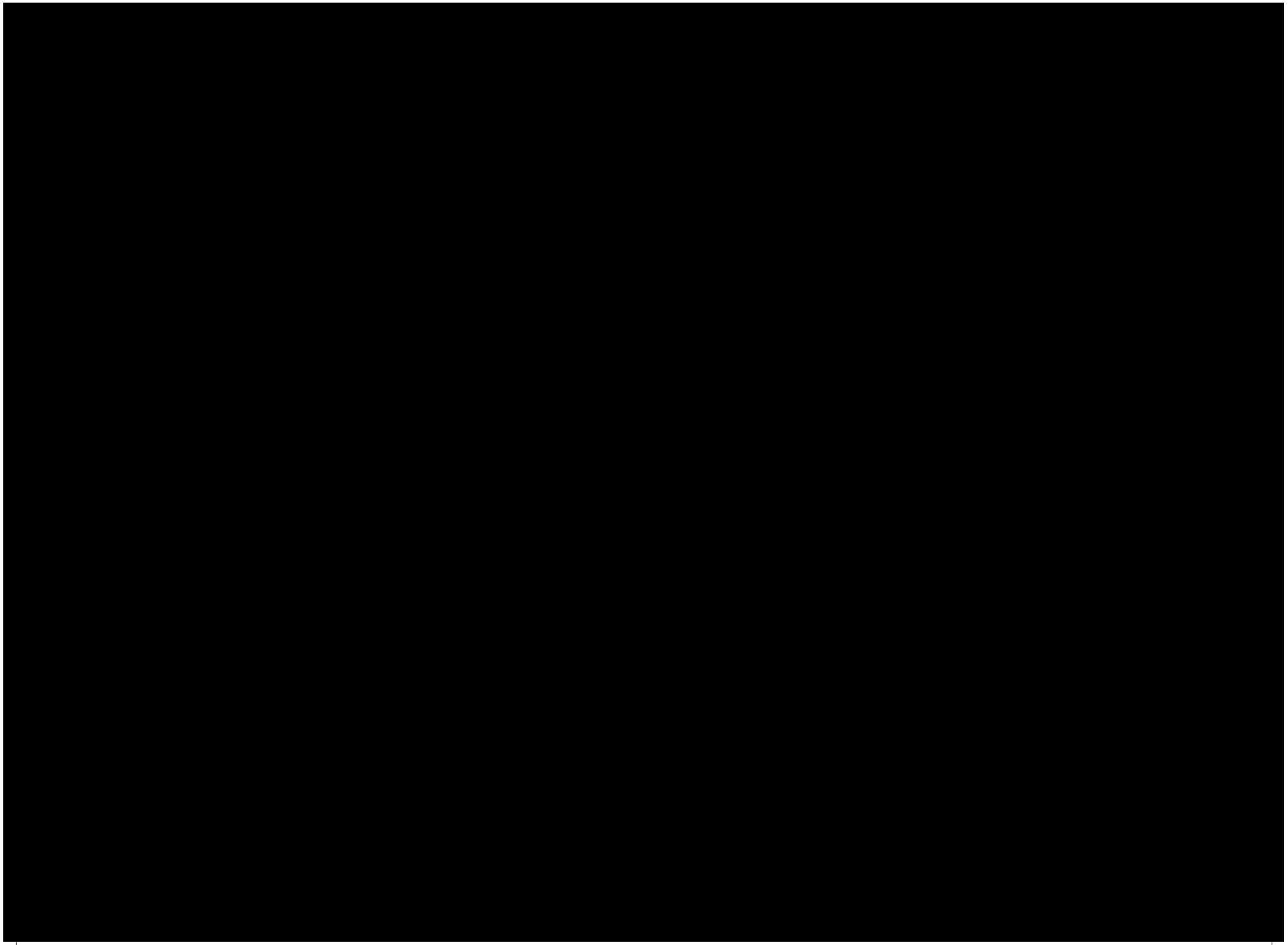


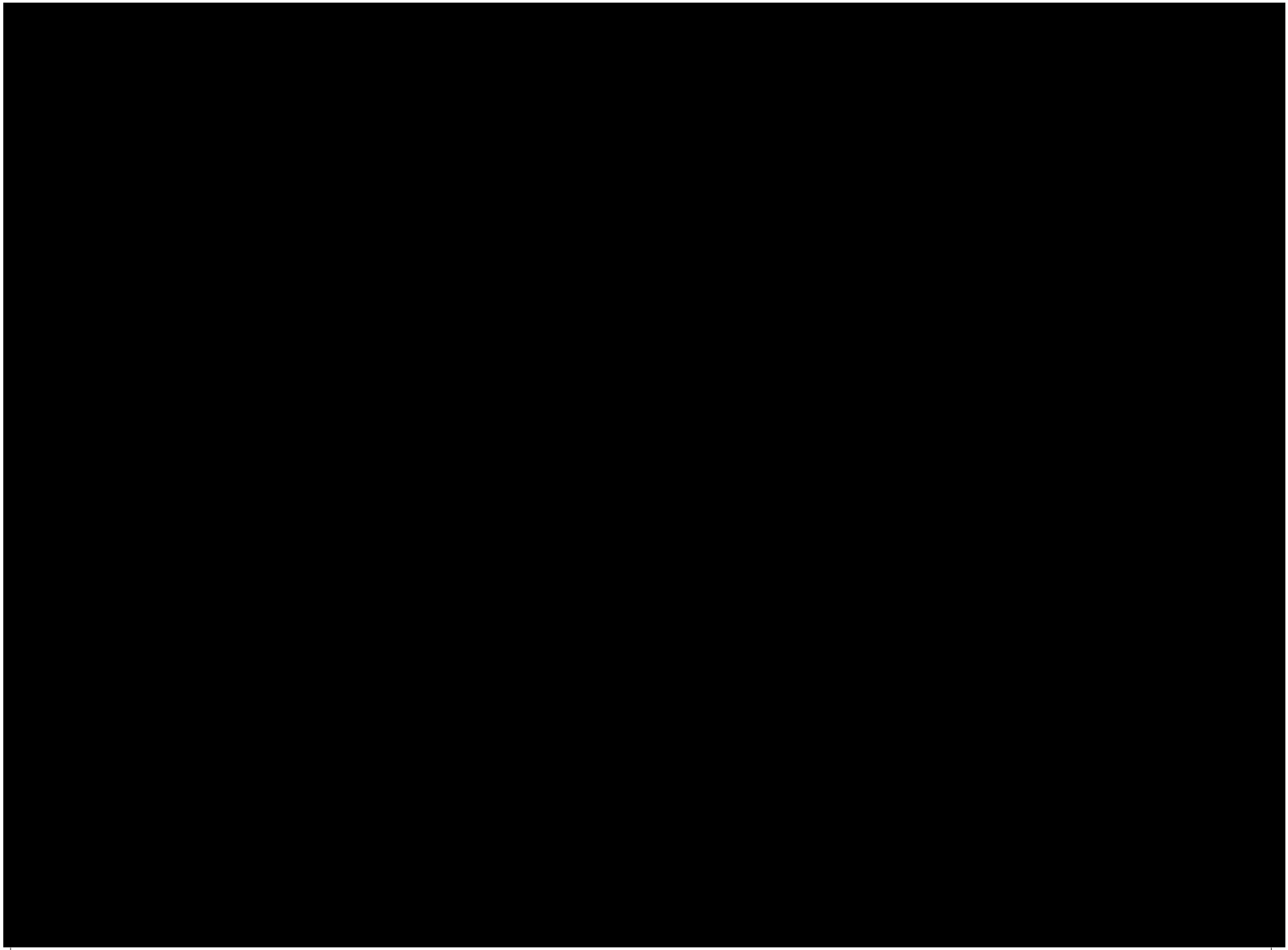
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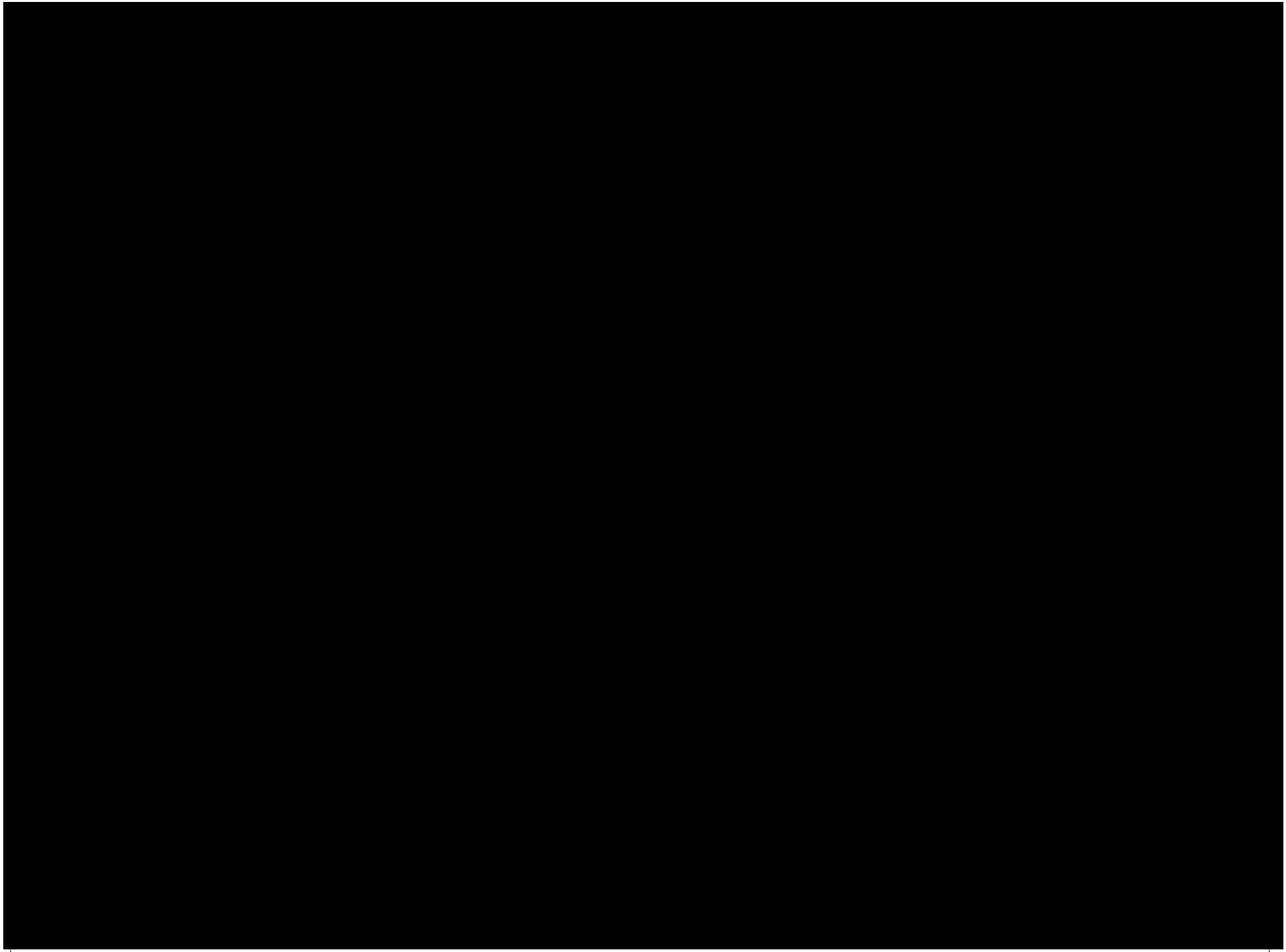




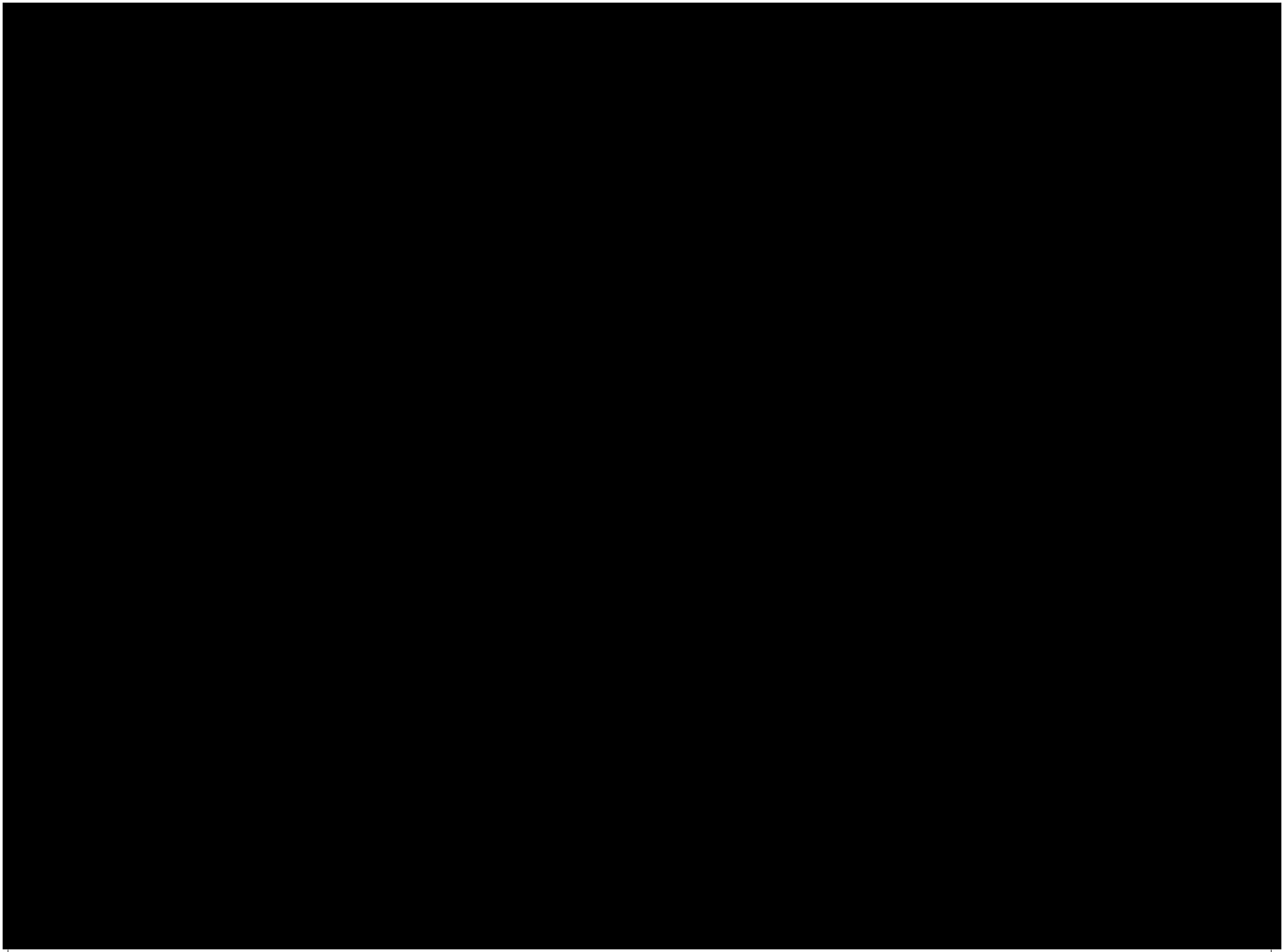






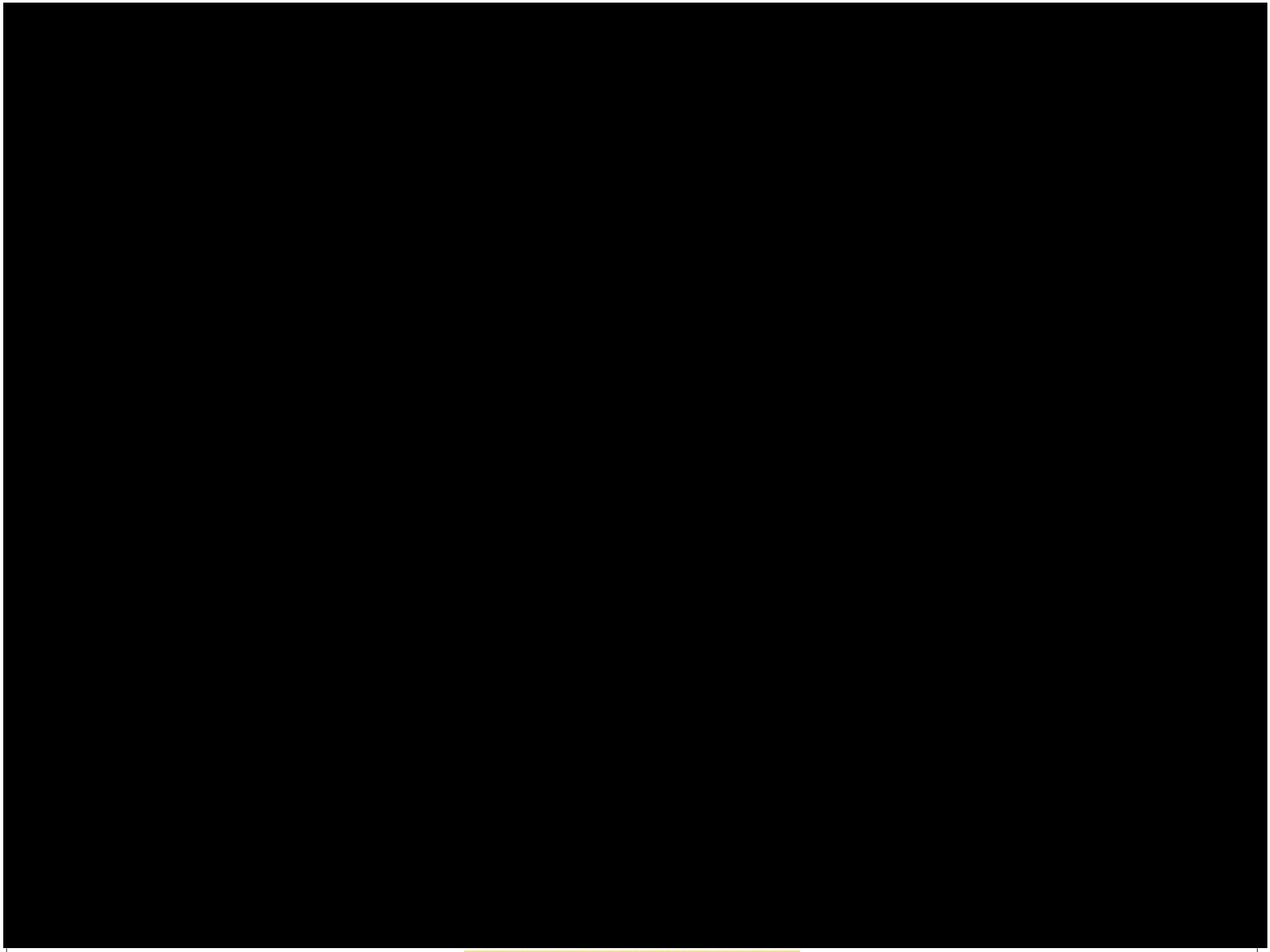


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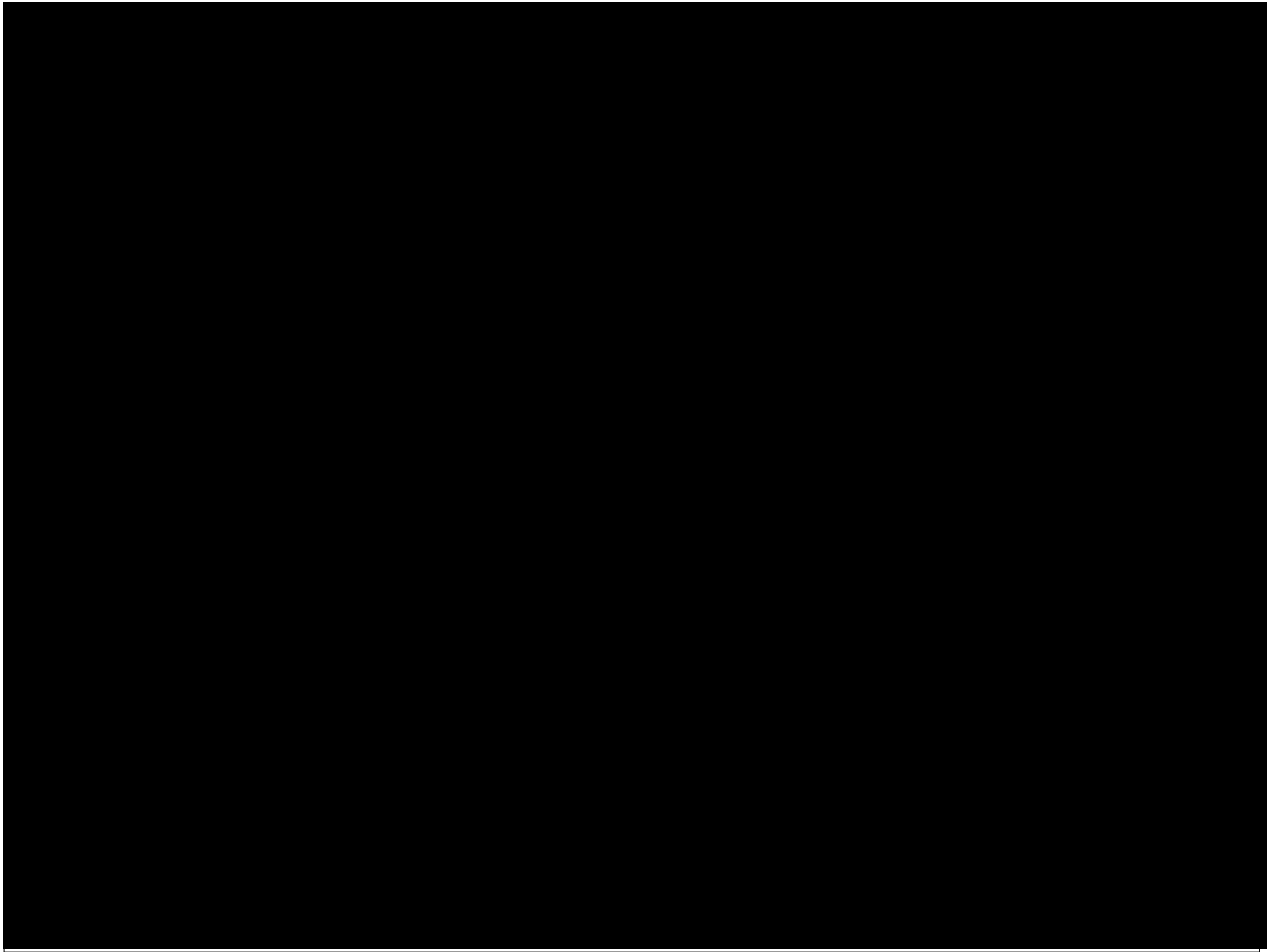


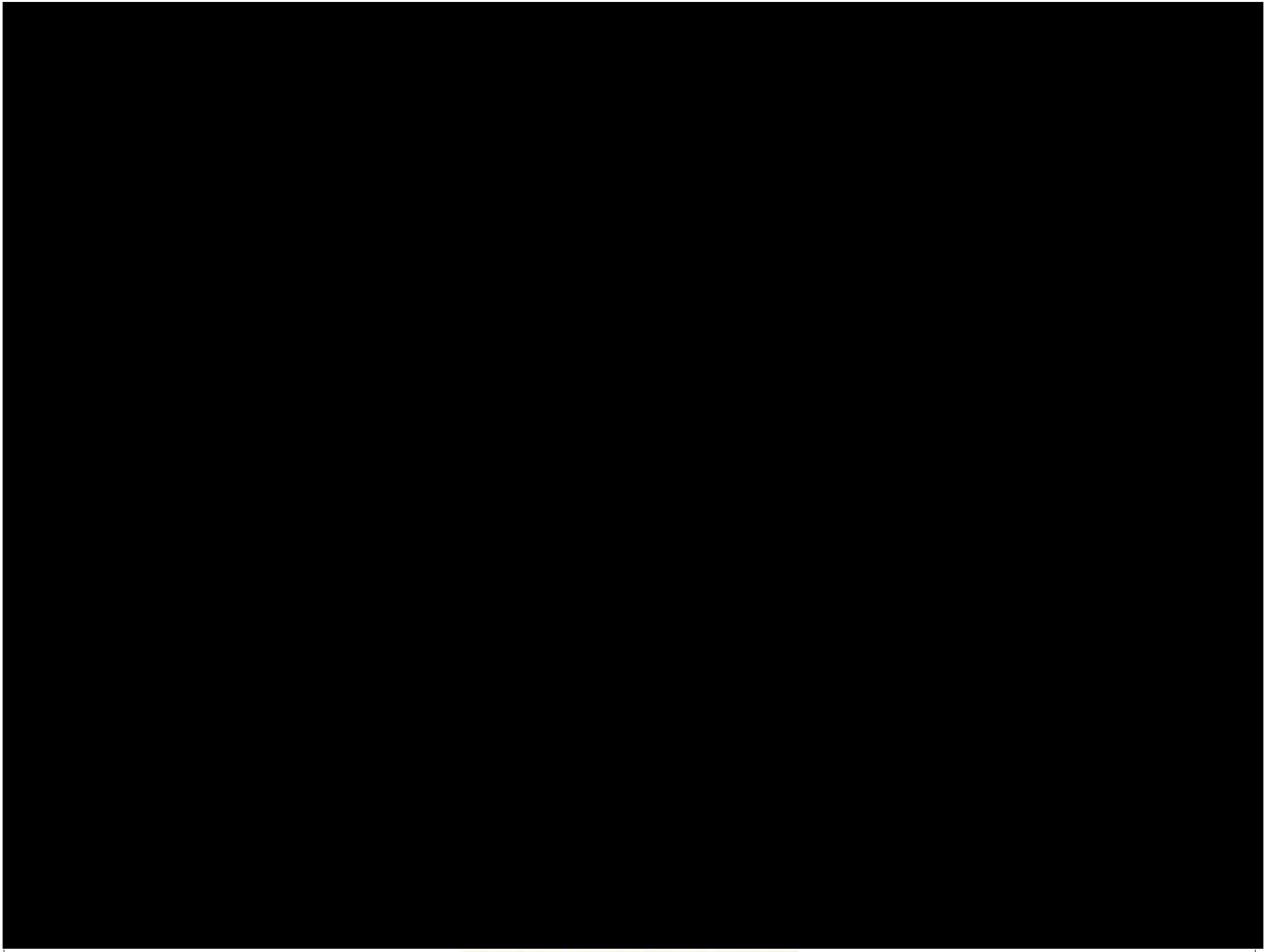
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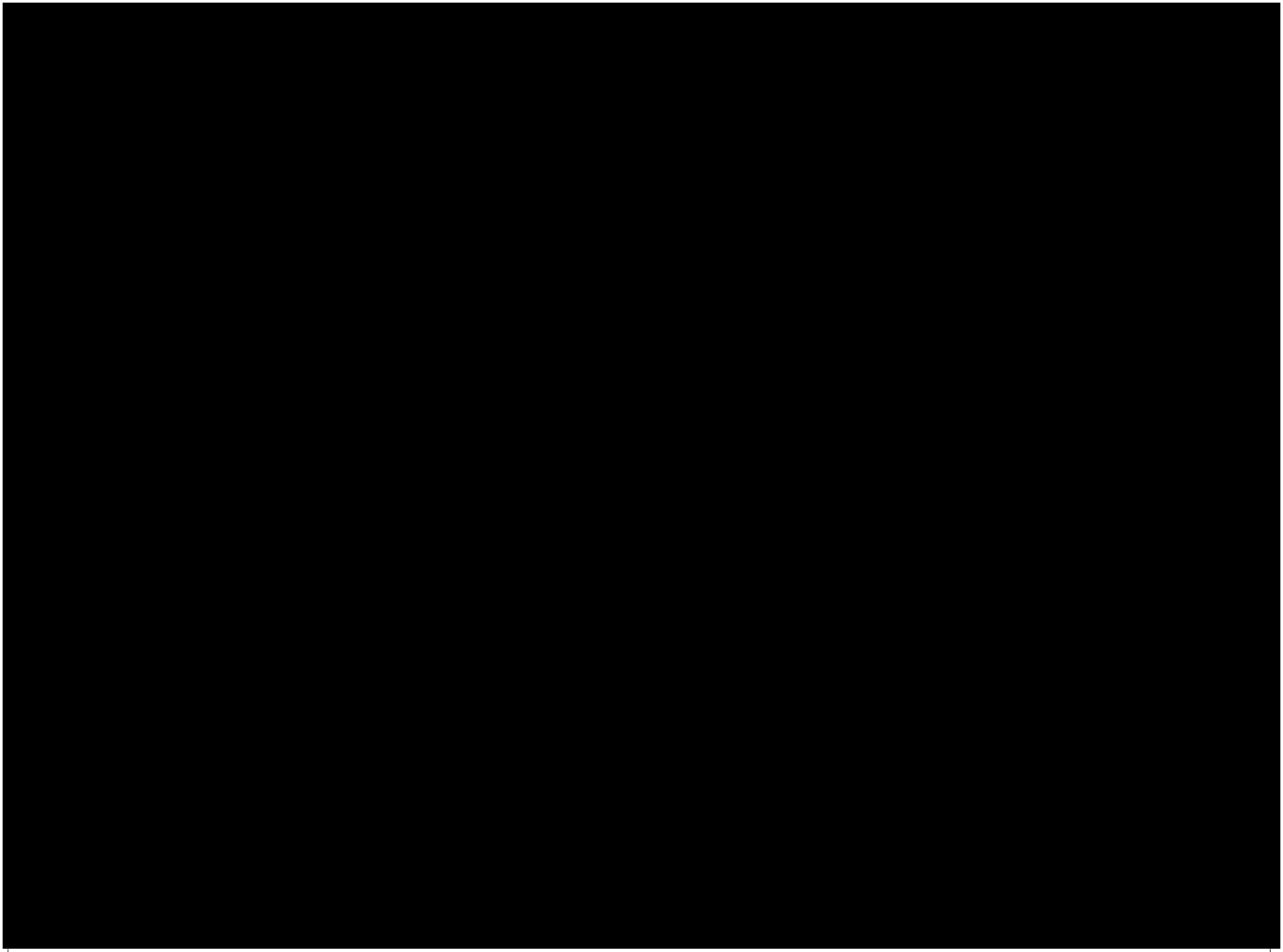


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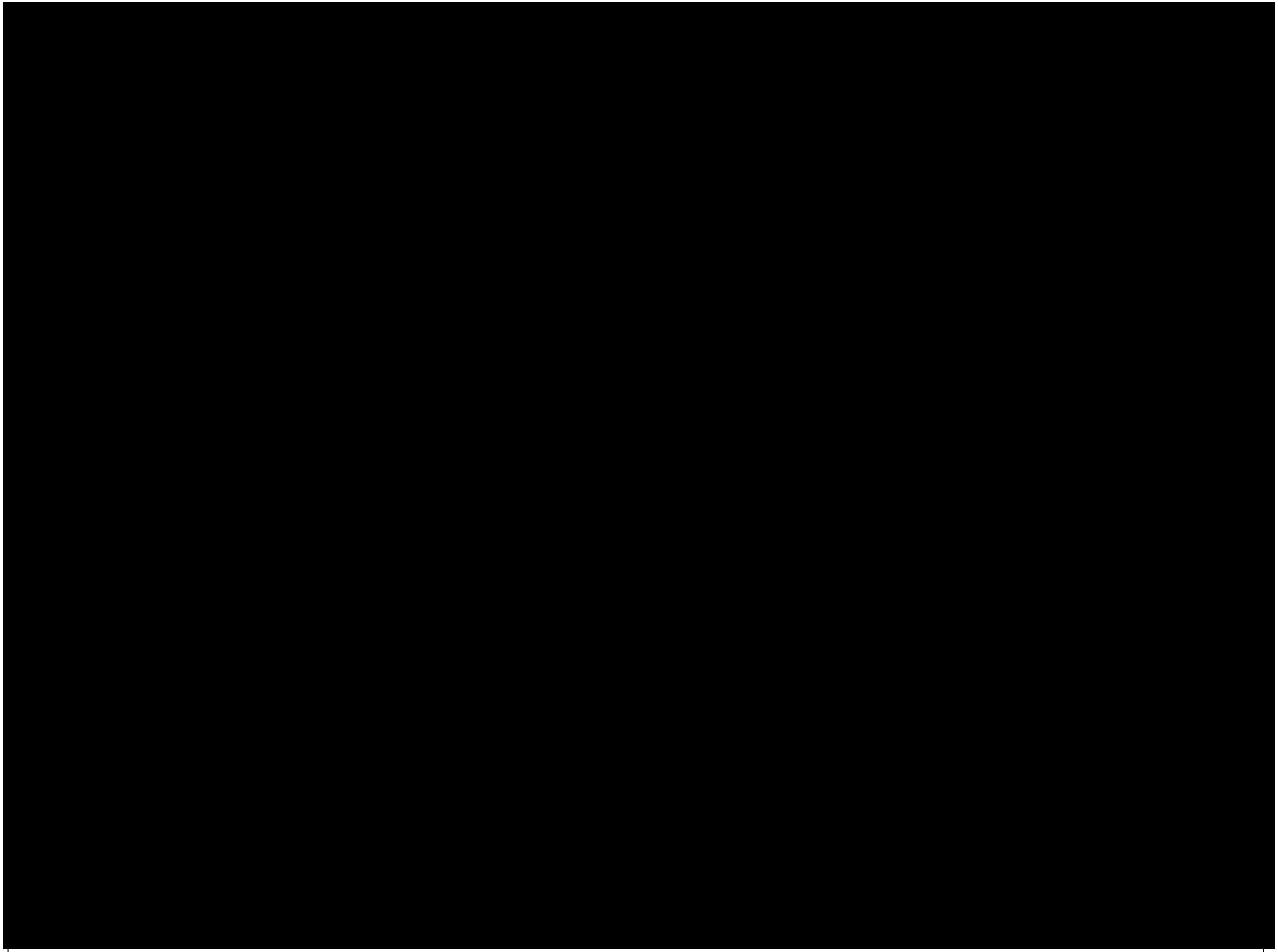


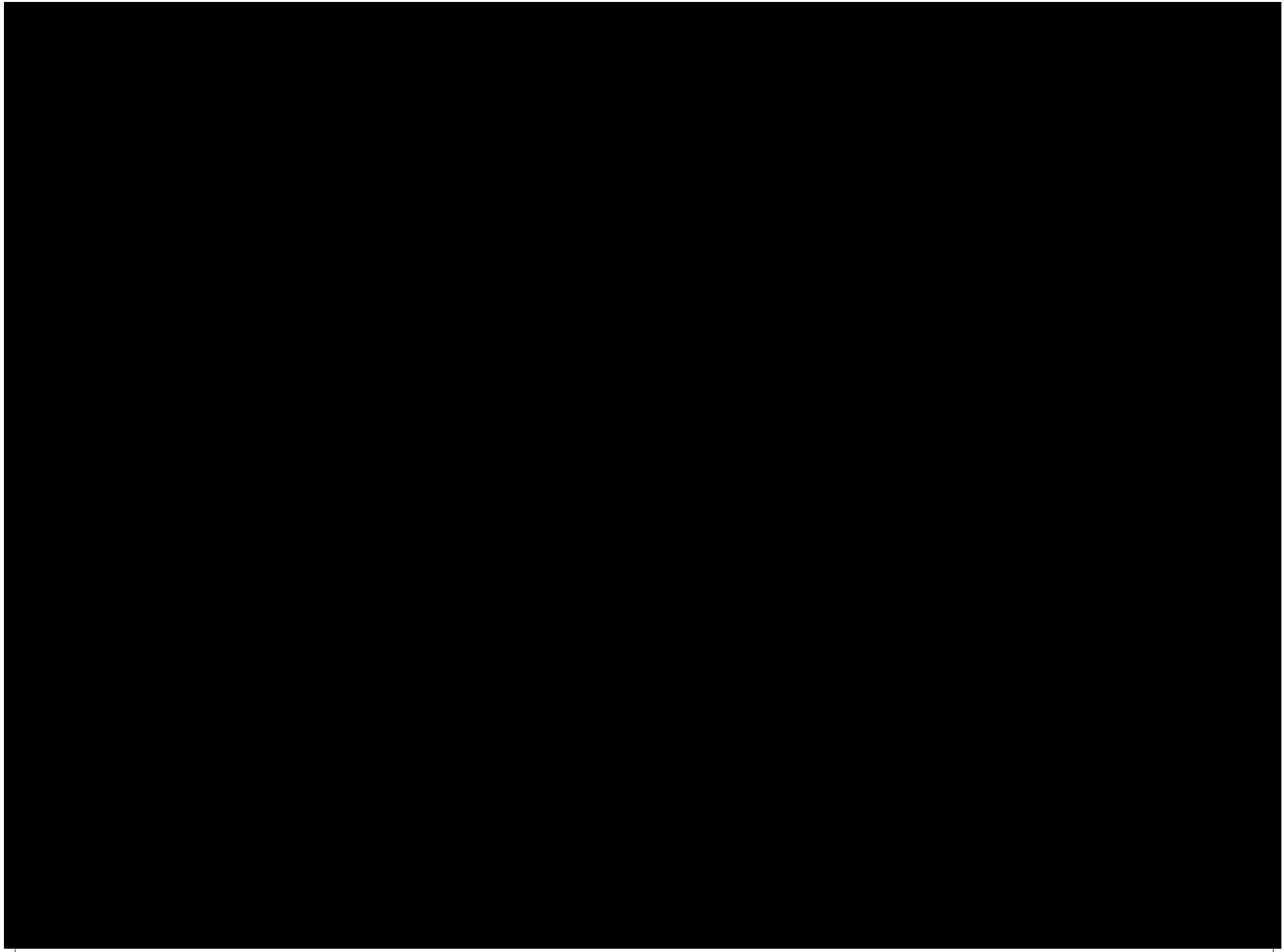


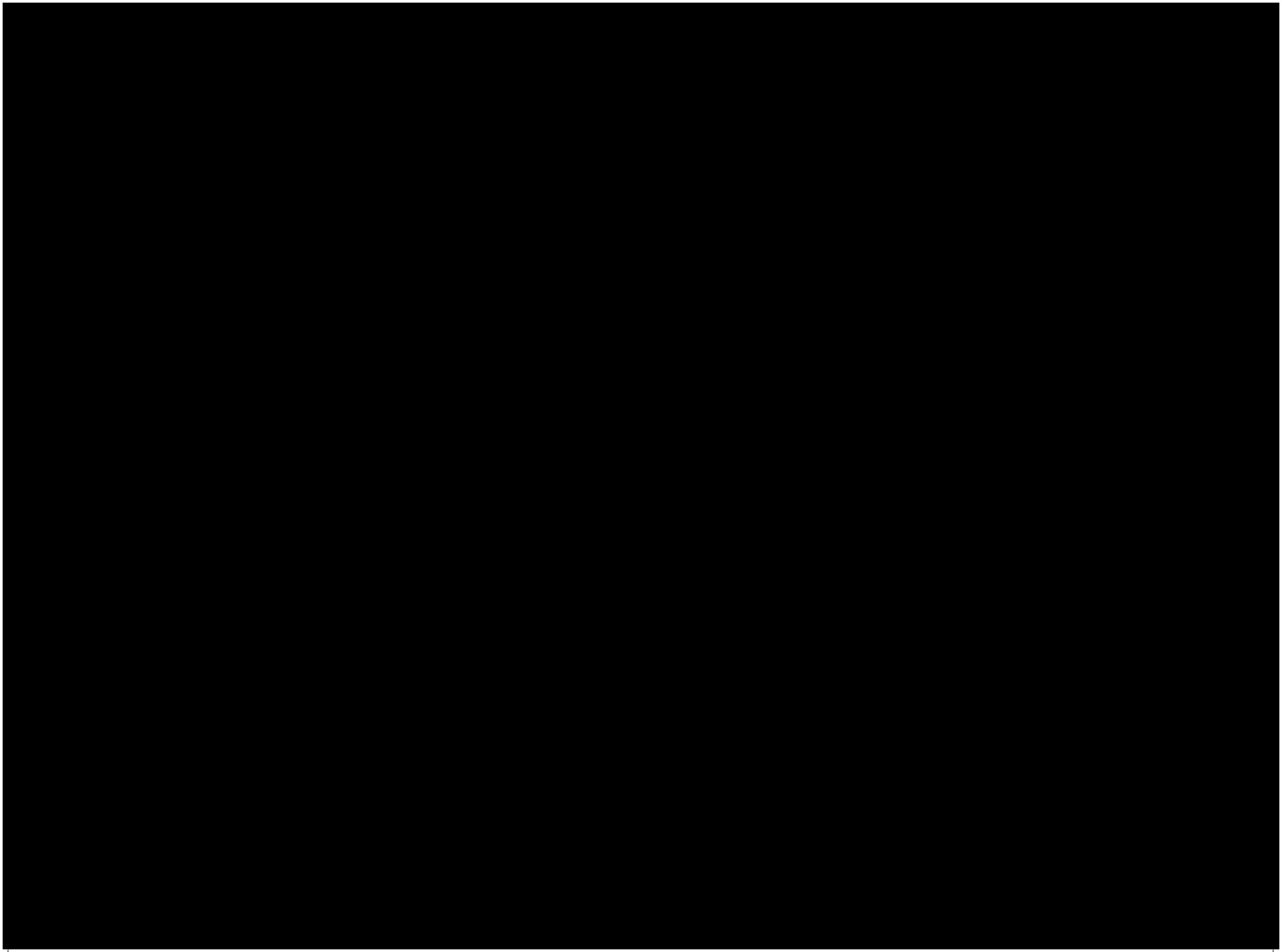
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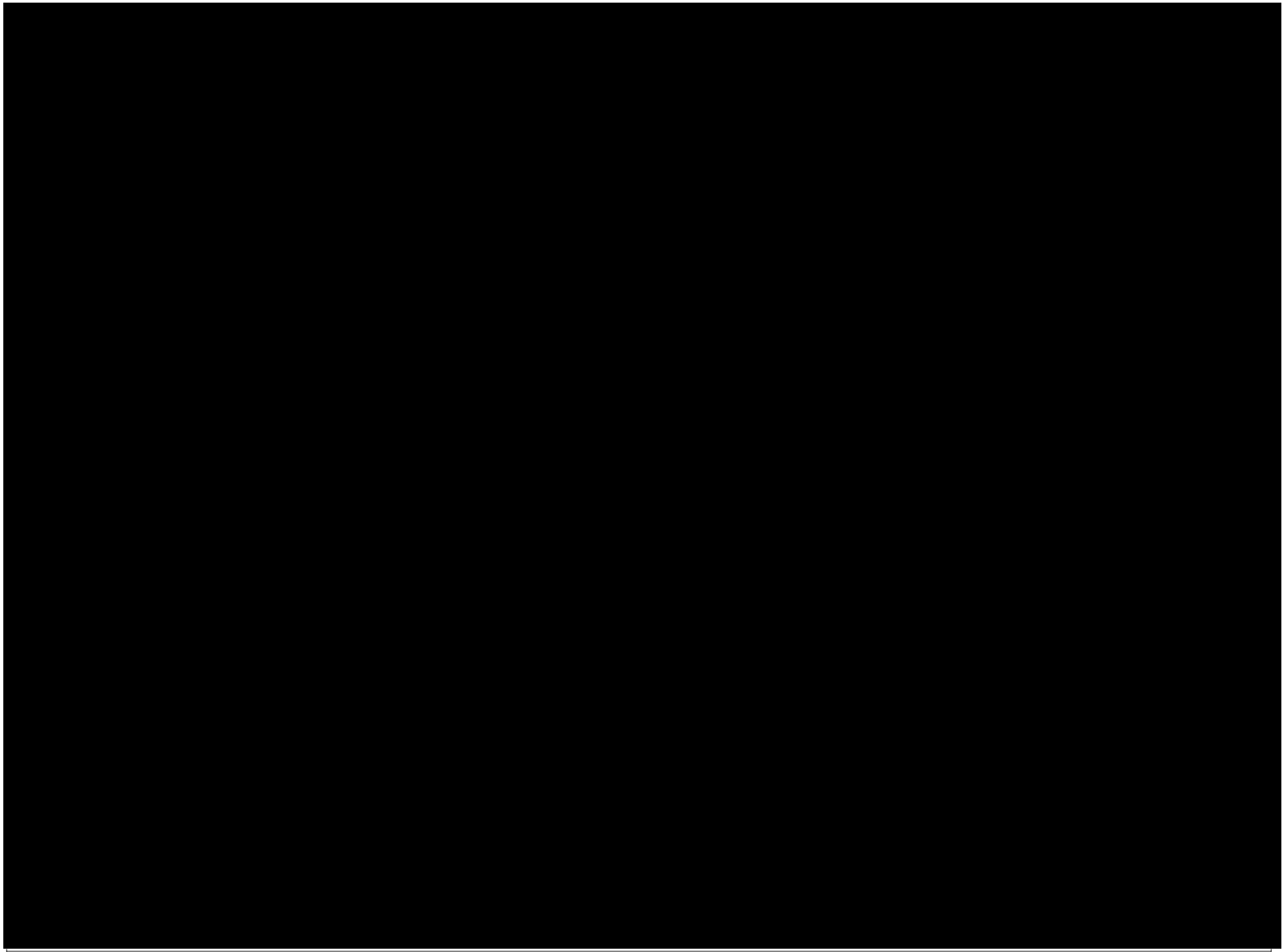








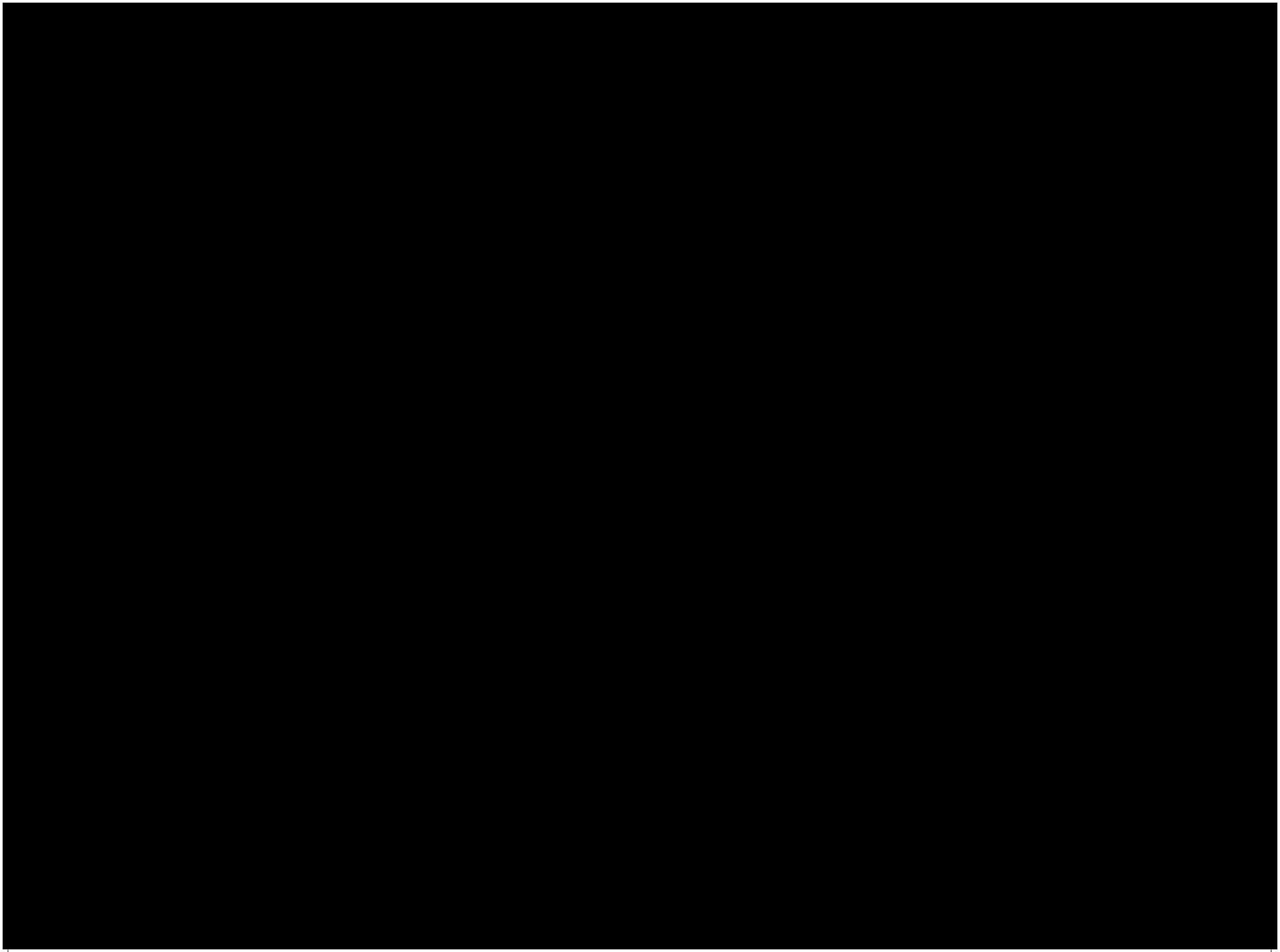


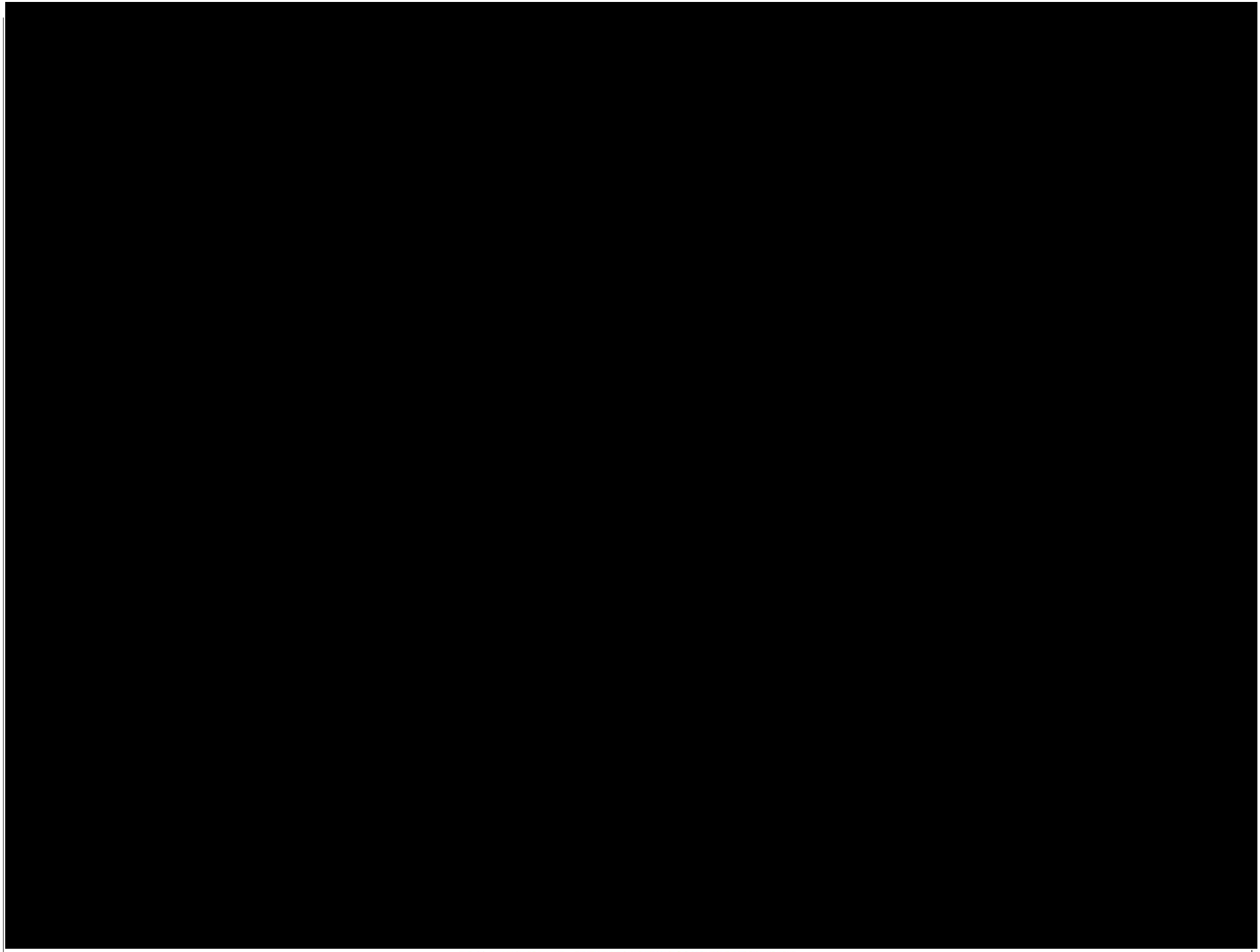


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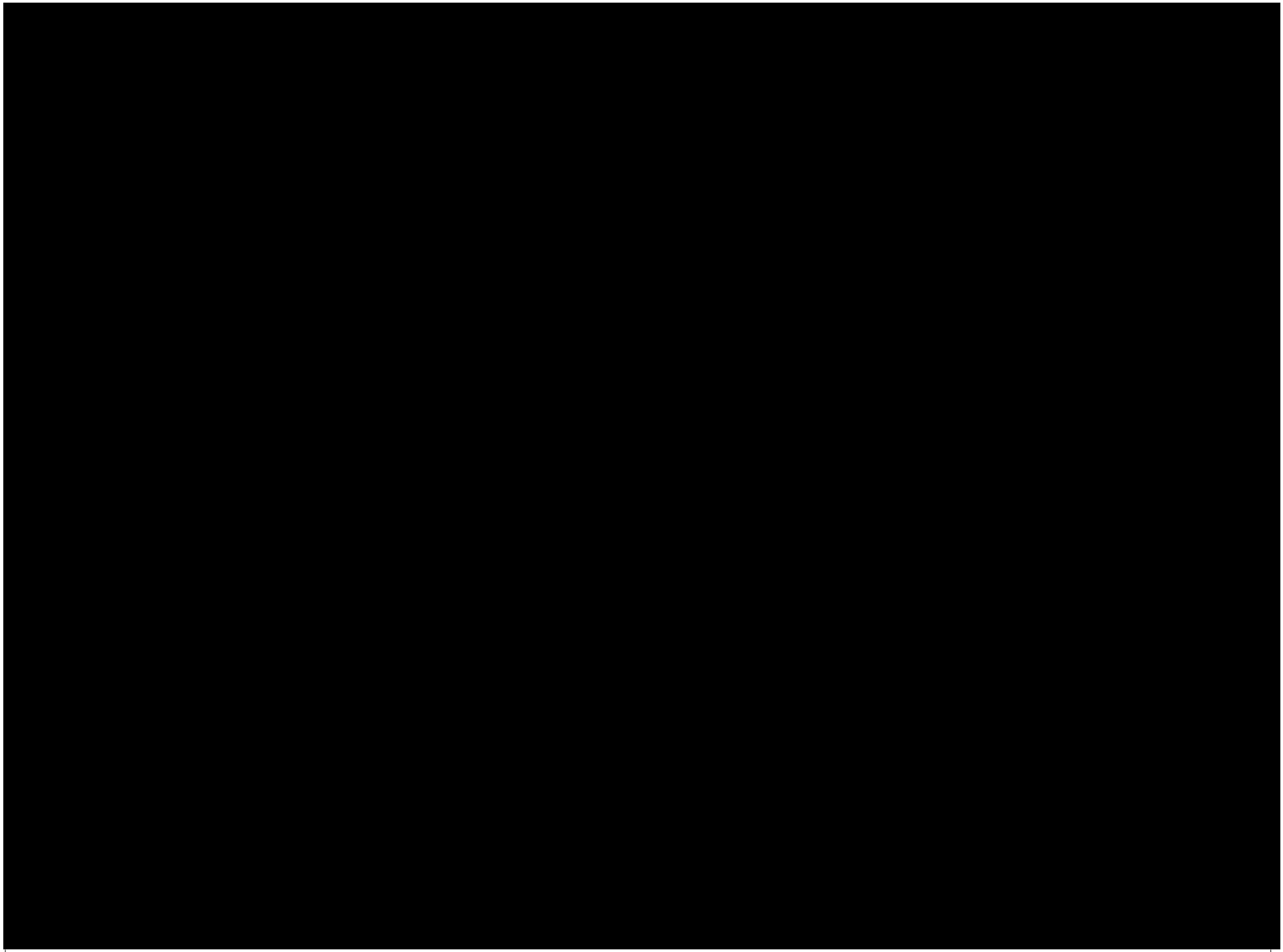
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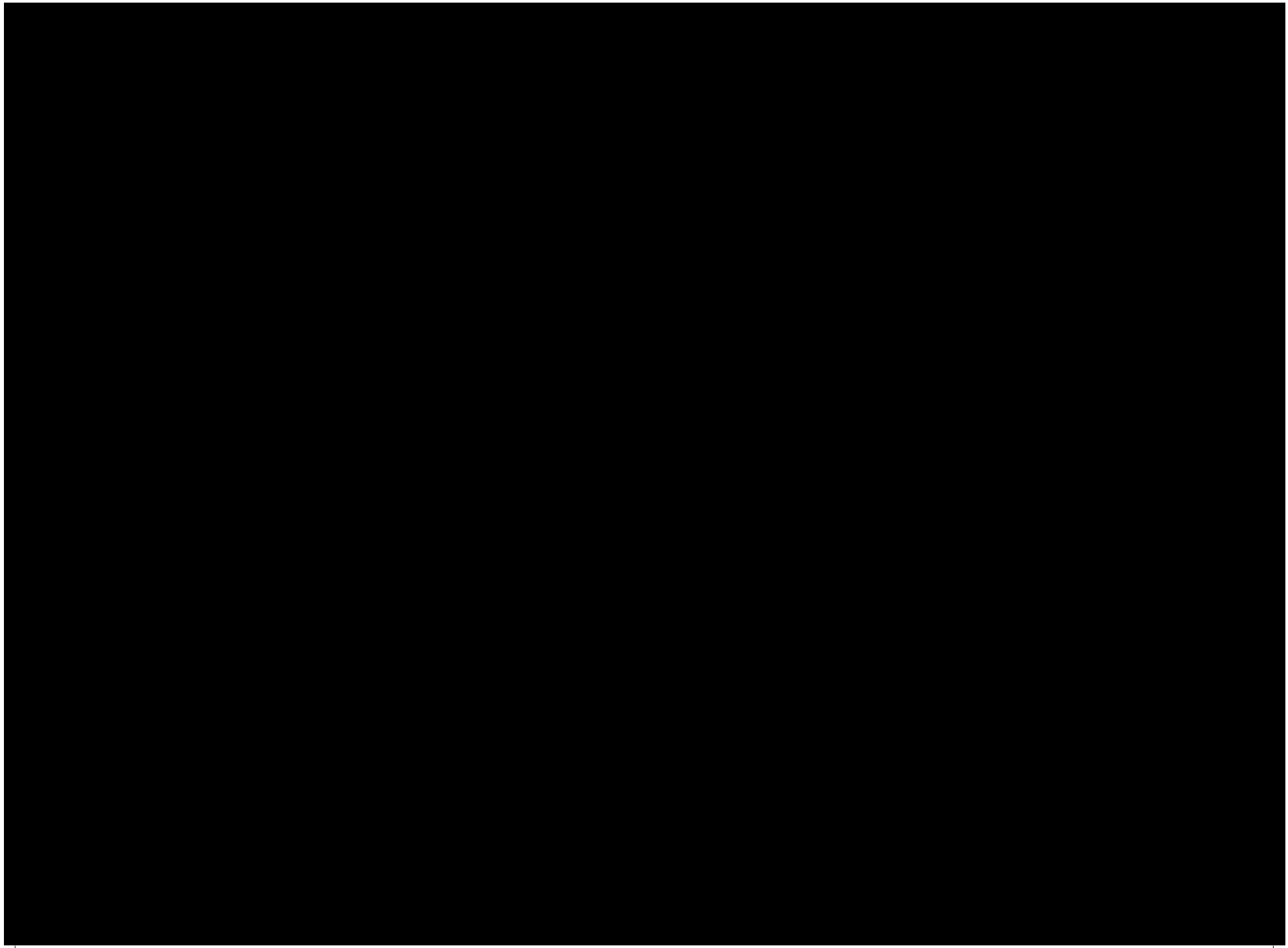


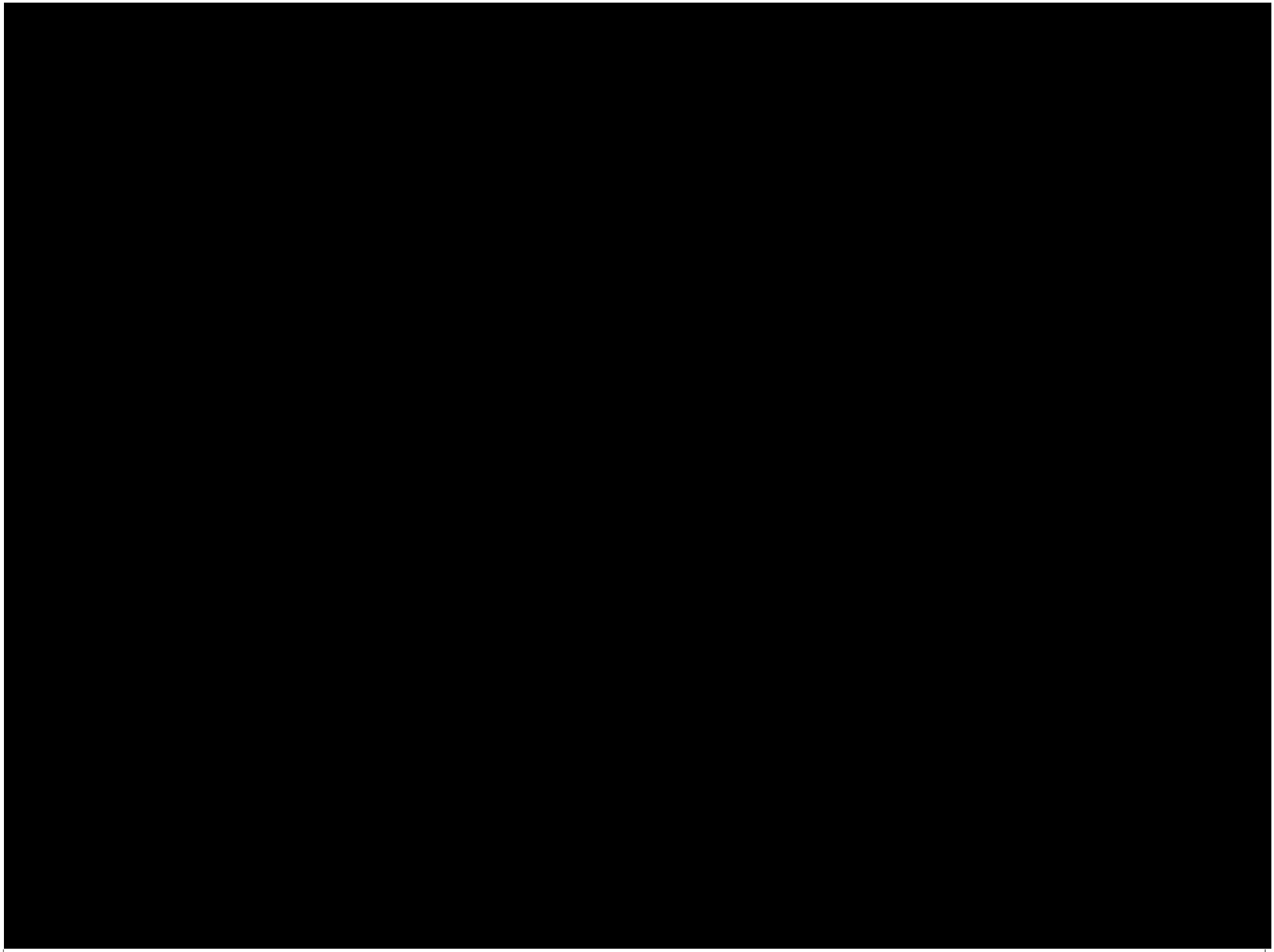




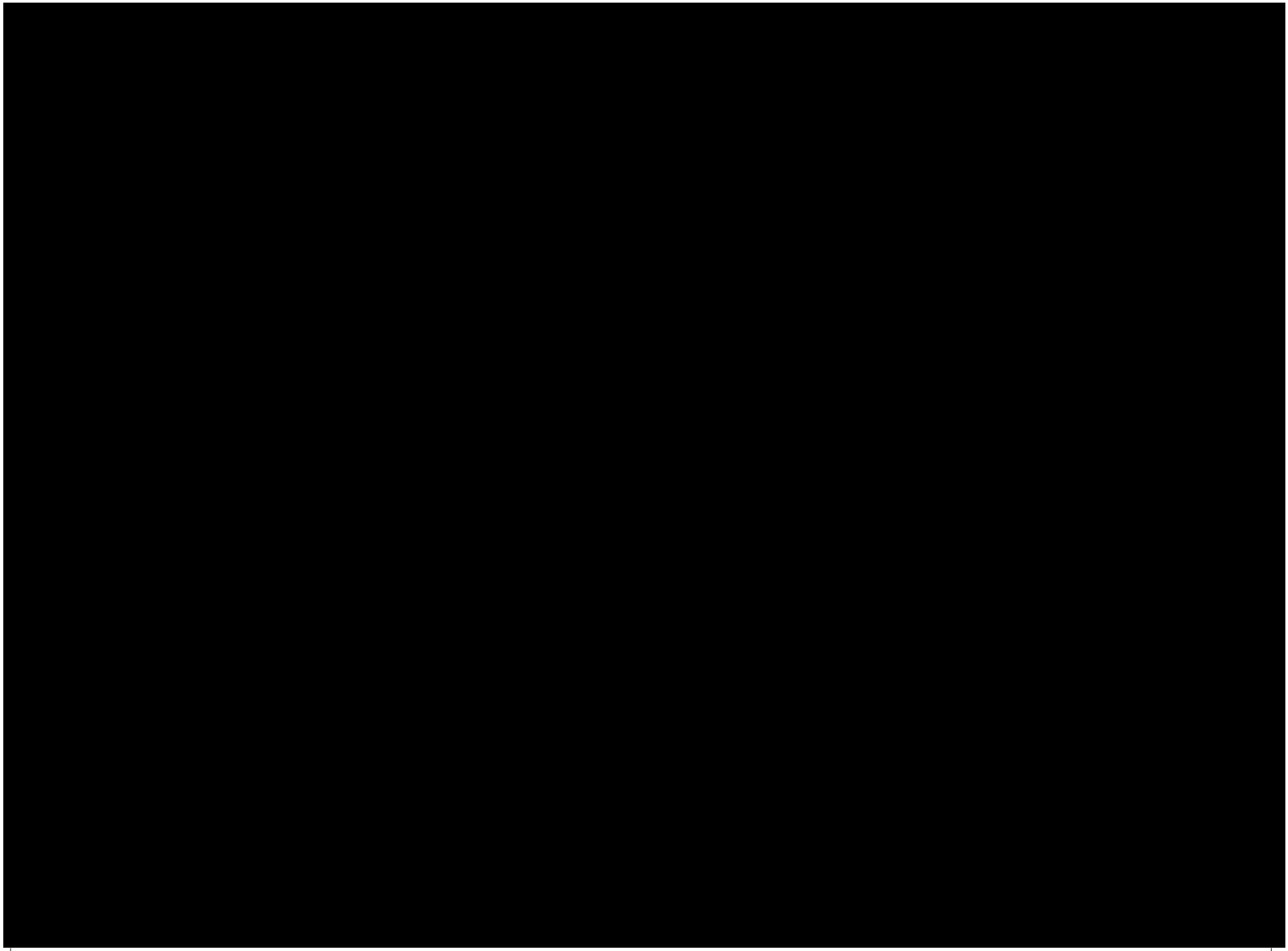
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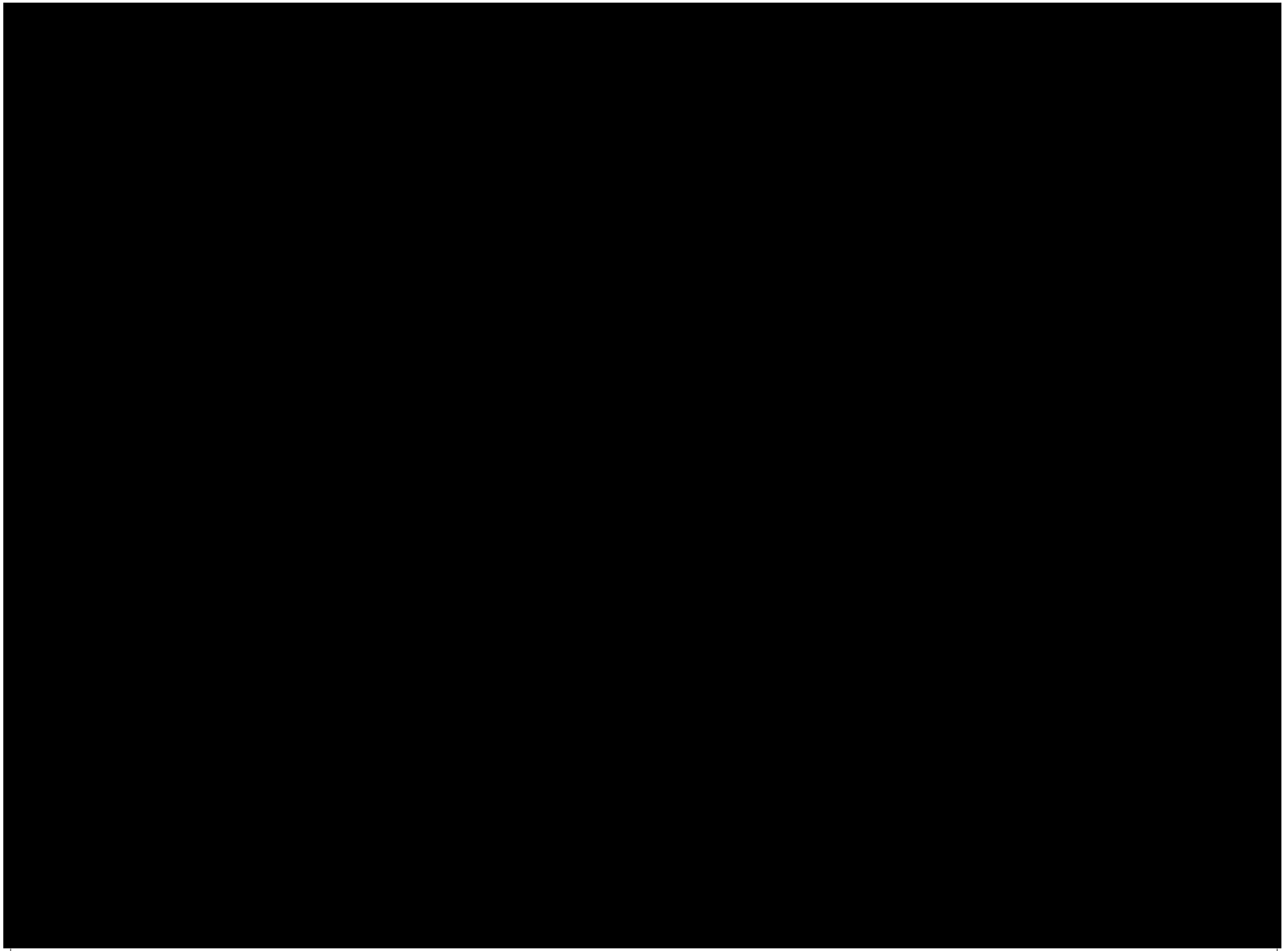




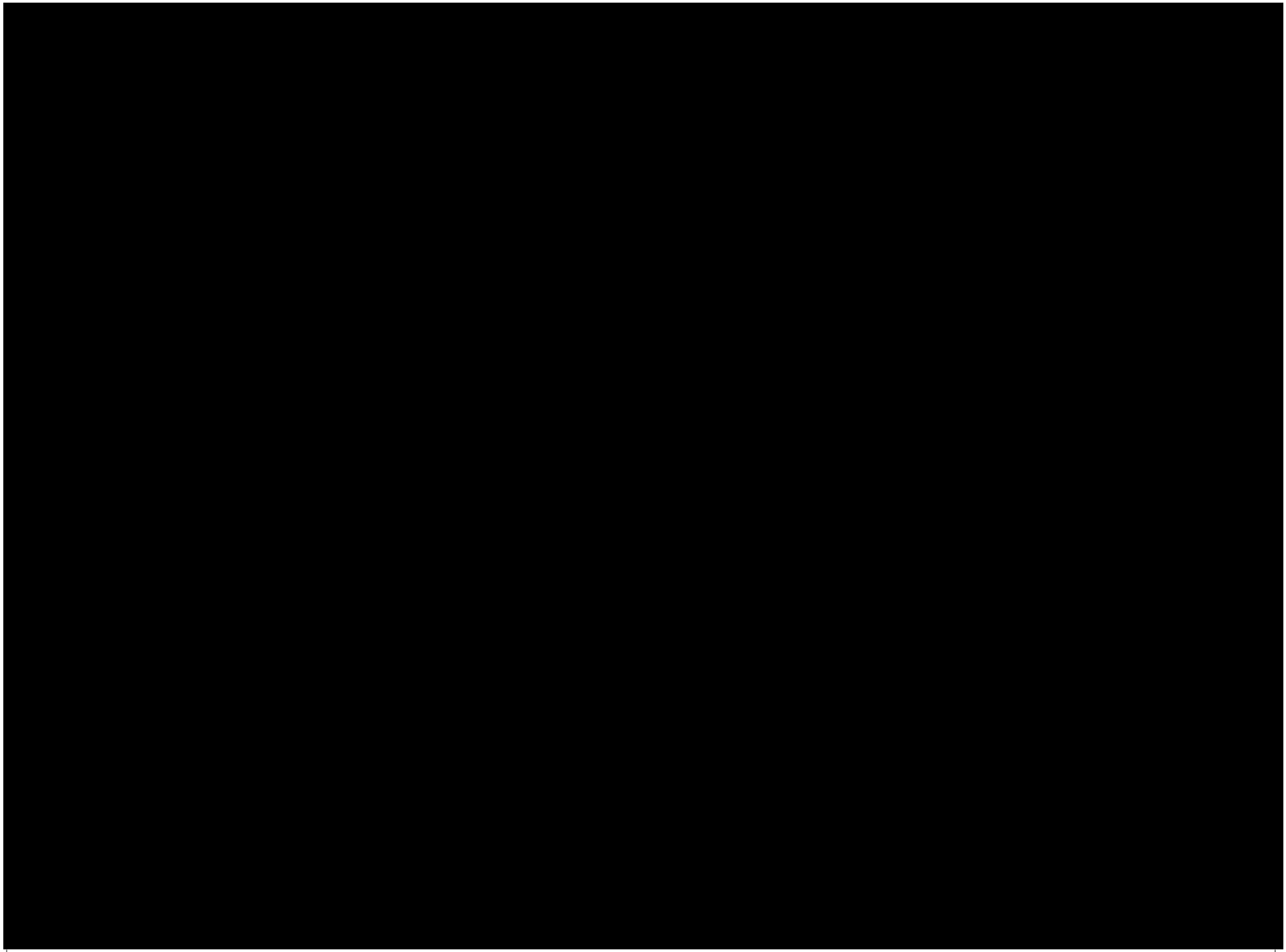


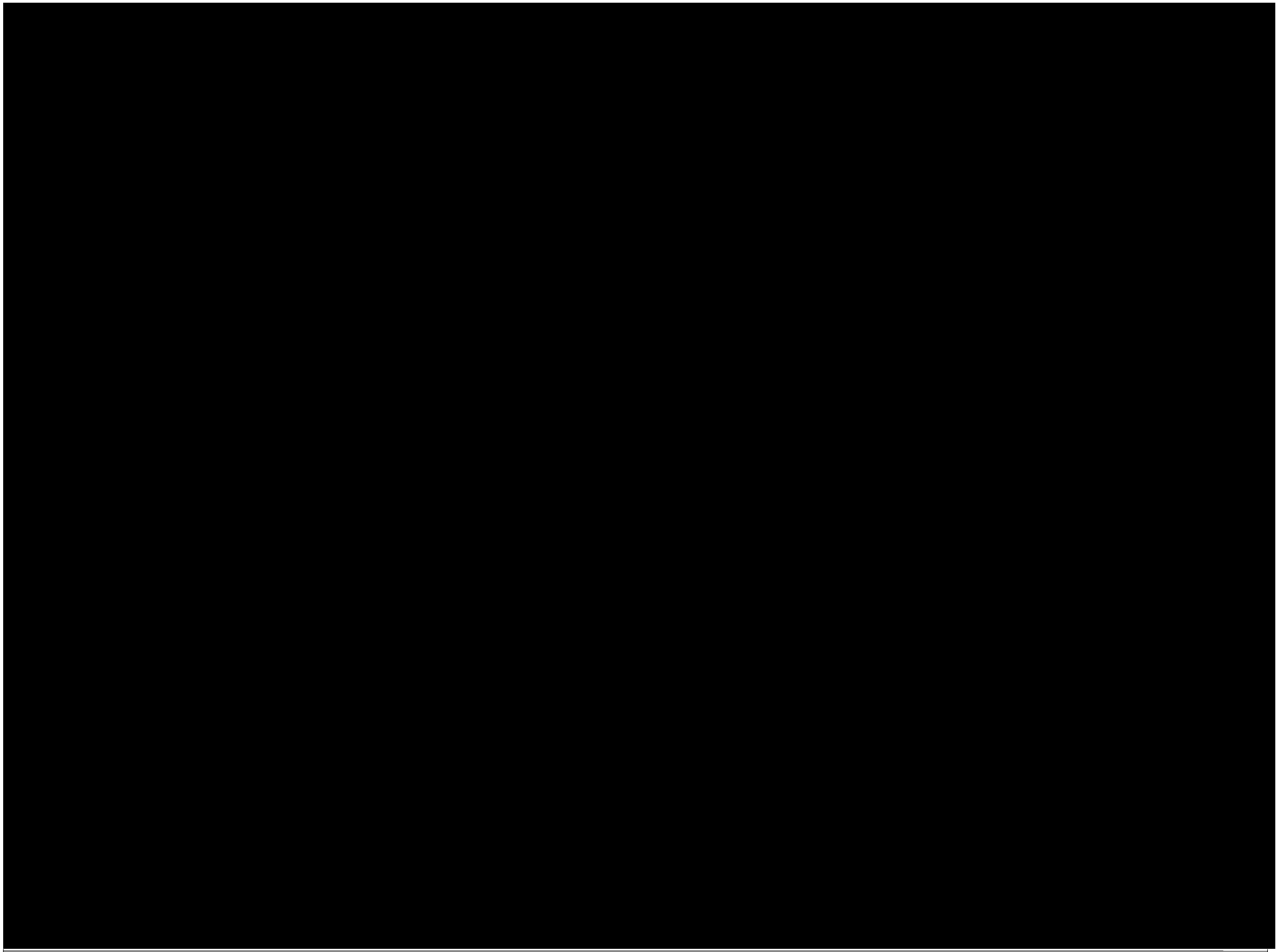
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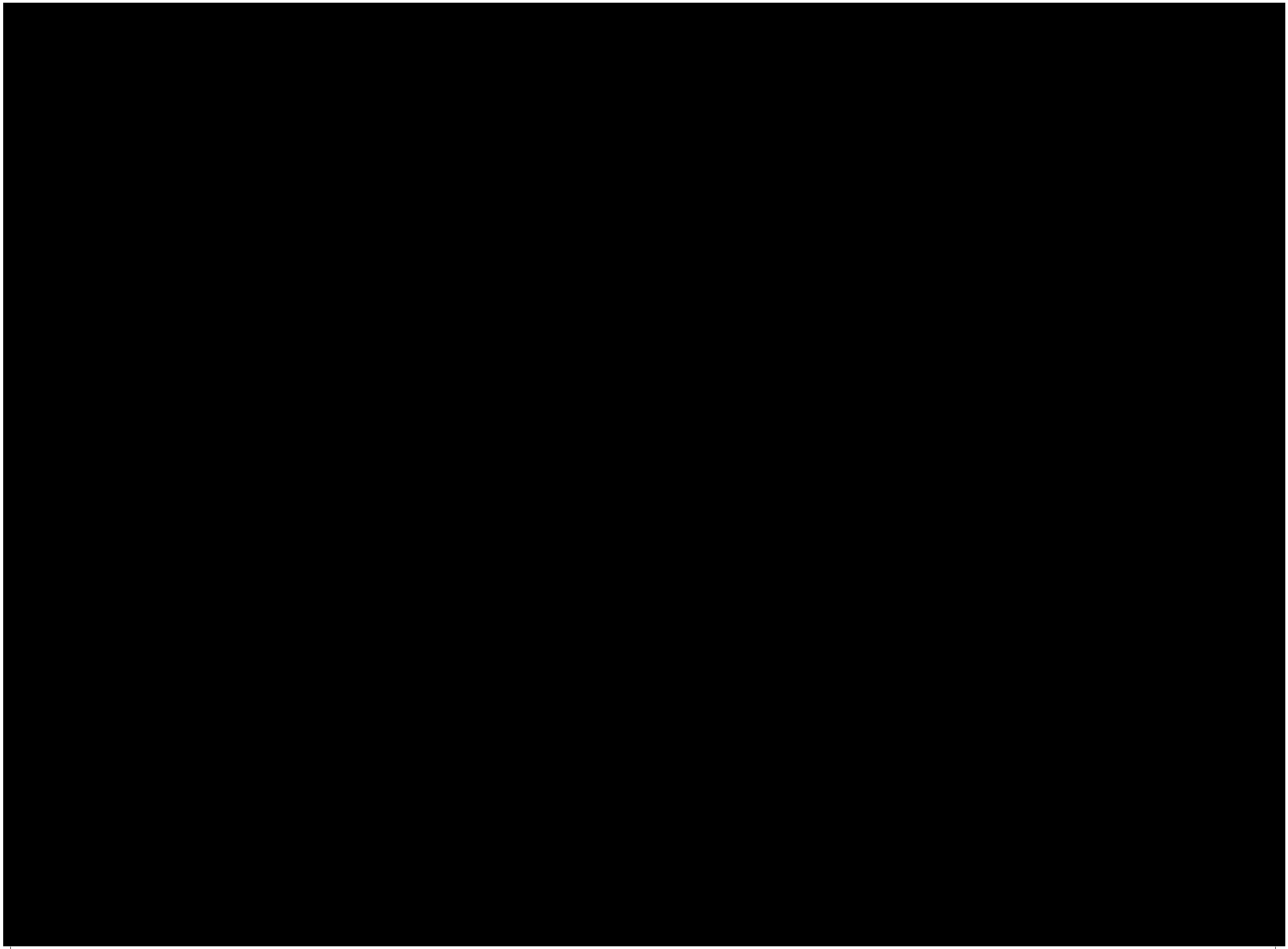




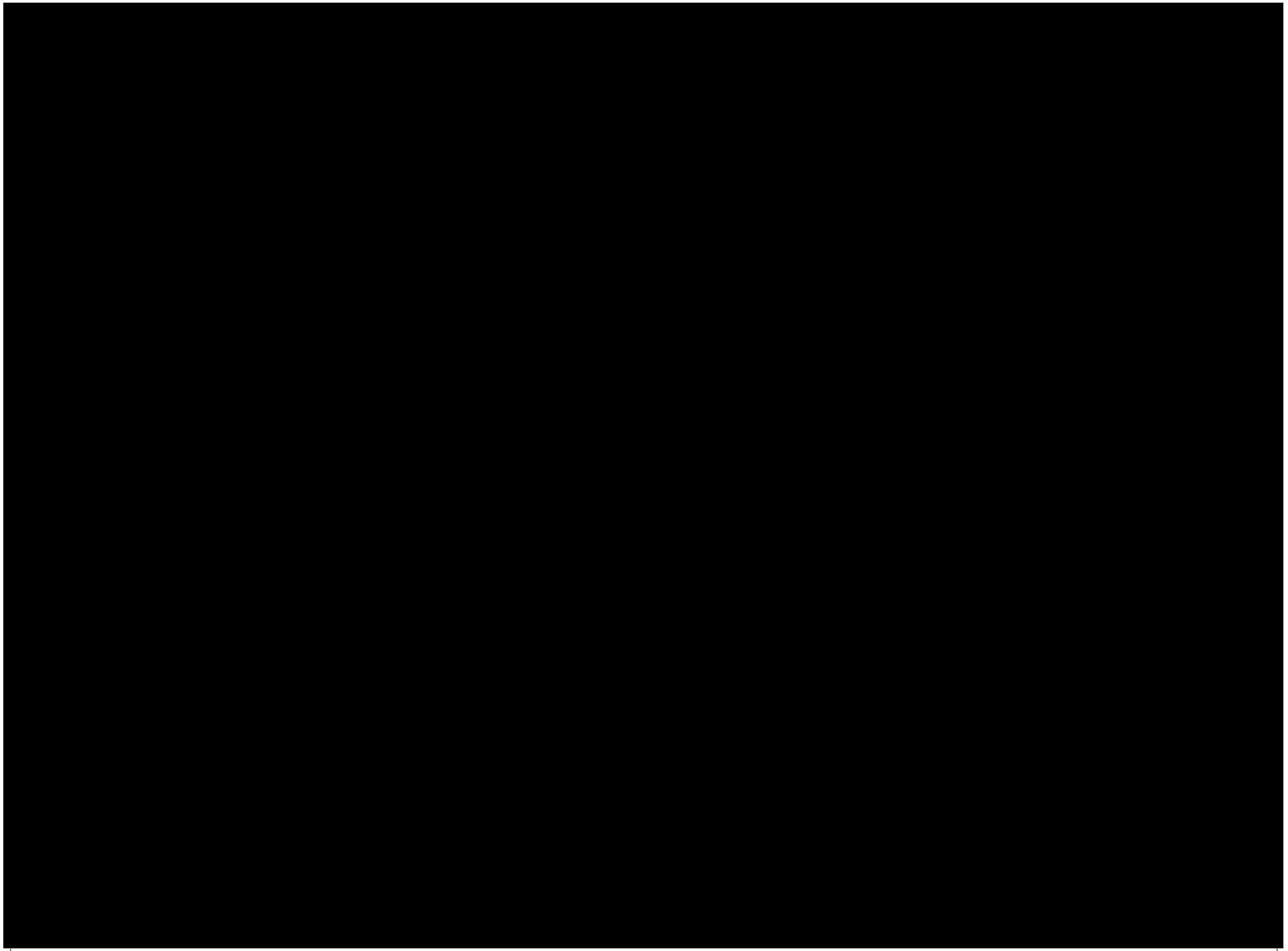




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## VI.A.2.II.c.4 Security, Privacy, and Compliance Sample Reports

[redacted]

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## VI.A.2.II.c.6 Turnover Plan [RFP V.D.12]

**REQUIREMENT: RFP Section V.D.12**

The Turnover Plan shall include a detailed listing of all hardware and software required to operate the MDR solution and require that upon DHHS request, or one hundred and eighty (180) days prior to the end of the Term, the vendor shall provide for DHHS review and approval, a Knowledge Transfer Plan that includes the proposed curriculum, timeline and sample training materials that will be used to support DHHS or a DHHS designee in taking over the system management and operation.

***Conduent provides the documentation, training, and operational knowledge DHHS needs to assume system management responsibilities with minimal transition risk.***

We prepare for knowledge transfer throughout the contract period by maintaining current documentation, training materials, operational procedures, and system information. Rather than creating these resources at the end of the contract, we keep them organized and updated as business processes, system configurations, and operational requirements evolve. This approach preserves institutional knowledge and positions DHHS to execute a structured, low-risk transition whenever knowledge transfer activities are requested or required.

**Preserving Knowledge. Reducing Risk**

- Continuously maintained documentation
- Role-based training and job aids
- Structured shadowing and reverse-shadowing activities
- Readiness validation and transition support

This approach reduces dependency on individual personnel while preserving institutional knowledge and operational continuity. As system enhancements, regulatory updates, and business process changes occur, we update training materials, operational procedures, and technical documentation to maintain an accurate knowledge repository. As a result, DHHS maintains visibility into system operations and remains prepared to assume responsibility for system management or transition operations to a designated successor when required.

Figure VI.A.2.II.c.6-1 shows an overview of the turnover process captured in our Turnover Plan.

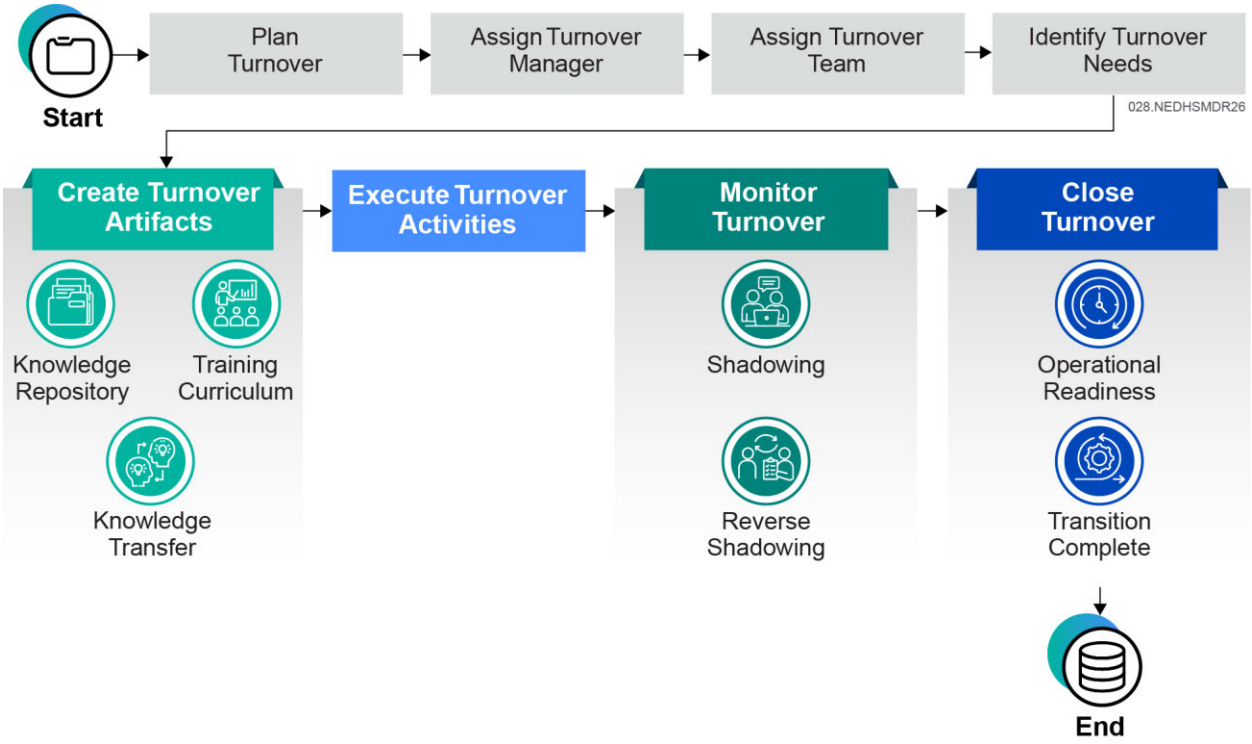



**Figure VI.A.2.II.c.6-1. Turnover Approach and Key Artifacts**
*Conduent's turnover methodology is supported by a comprehensive set of transition artifacts, knowledge transfer trackers, and readiness assessments. This methodology provides visibility into progress and support a structured, low-risk transfer of responsibilities.*

## Knowledge Transfer Governance

***We establish a formal governance process to oversee knowledge transfer and turnover readiness activities.***

Upon DHHS request, or no later than 180 days prior to contract expiration, we submit a comprehensive **Knowledge Transfer Plan** for DHHS review and approval. The plan identifies the transfer scope, curriculum, schedule, training resources, documentation requirements, participant roles, and readiness milestones necessary to support a successful transition.

Regular reviews with DHHS help knowledge transfer activities remain aligned with operational objectives, transition priorities, and readiness expectations. Established governance processes track issues, risks, and action items through to successful completion.

## Knowledge Transfer Plan Development

When DHHS initiates knowledge transfer activities, we develop a detailed Knowledge Transfer Plan that guides transition activities. The plan includes a detailed transition timeline that identifies training activities, shadowing periods, readiness assessments, and transition milestones. The plan includes a detailed transition timeline identifying major training activities, shadowing periods, reverse-shadowing activities, readiness assessments, and transition milestones.

The Knowledge Transfer Plan includes:

- Training objectives
- Knowledge transfer schedule
- Documentation inventory
- Training curriculum
- Transition roles and responsibilities
- Readiness assessment criteria
- Knowledge validation activities
- Transition completion criteria

Figure VI.A.2.II.c.6-2 shows our baseline Turnover Plan and key information captured in the plan.

The State reviews and approves the plan before execution begins to confirm alignment with operational priorities and transition goals.

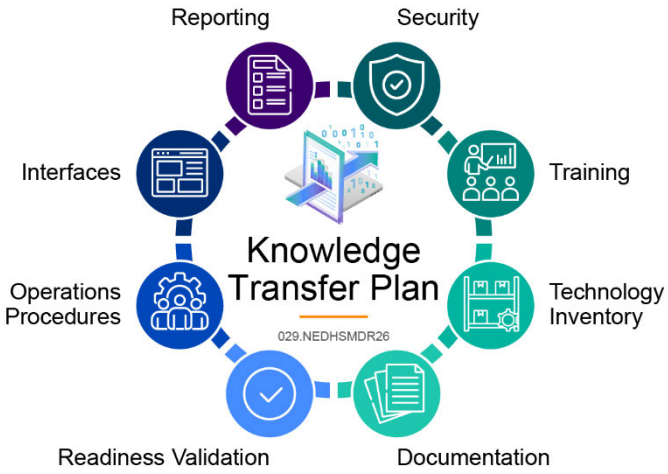



**Figure VI.A.2.II.c.6-2. Turnover Plan Components**
*Our Turnover Plan minimizes risk by providing reliable guidance for successfully transferring all operational components in a timely manner.*

### *Documentation and Knowledge Repository*

Throughout the contract period, we maintain a centralized repository containing the operational, technical, and administrative documentation required to support the MDR solution. The repository includes system administration procedures, operational workflows, security guidance, interface specifications, reporting instructions, disaster recovery documentation, configuration records, and maintenance procedures. Documentation remains under version control and is updated regularly to reflect current business processes, system configurations, and operational procedures.

Rather than creating documentation solely for turnover activities, we maintain and update these materials throughout the contract period. Upon DHHS request, or during contract closeout, the repository provides the information needed to support transition planning, knowledge transfer, and ongoing operations.

**Outcome:** DHHS has access to current documentation that supports daily operations and reduces transition risk.

## Hardware and Software Inventory Management

We maintain a comprehensive inventory of the hardware, software, interfaces, and supporting technologies required to operate the MDR solution. The inventory is established during implementation and updated throughout the contract lifecycle.

The inventory includes application components, software versions, infrastructure resources, interfaces, reporting tools, security components, databases, monitoring utilities, and supporting third-party technologies.

Upon DHHS request, or during contract closeout, we provide the inventory and supporting documentation to support transition planning and operational continuity.

## Training Curriculum

We develop a comprehensive, role-based training curriculum designed to prepare DHHS personnel or a designated successor organization to assume responsibility for system administration, operational support, and MDR business functions. The curriculum is tailored to participant responsibilities and provides the knowledge required to effectively manage both the business and technical aspects of the solution.

Operational training focuses on the day-to-day activities that support the State's MDR Program. These activities include:

- Rebate invoicing
- Collections management
- Accounts receivable processing
- Dispute resolution
- Manufacturer communications
- Operational reporting
- CMS-related activities

Technical training addresses system administration, user and security management, configuration management, interface monitoring, reporting administration, and troubleshooting procedures. Additional training supports maintenance and support functions such as incident management, change management, release management, performance monitoring, and operational support processes.

We design the curriculum to provide both conceptual knowledge and practical experience. Participants gain the skills needed to perform assigned responsibilities independently after transition.

The Knowledge Transfer Plan includes representative training materials, job aids, and instructional content for DHHS review and approval.

## Training Delivery Methodology

We use a blended training approach that combines instructor-led sessions, hands-on learning, demonstrations, workshops, and self-paced materials to maximize knowledge retention and operational readiness. Training begins with foundational concepts and progresses to practical application, allowing participants to build experience while gaining confidence in their ability to perform operational and technical responsibilities.

Participants receive instruction through classroom-style sessions, operational walkthroughs, system demonstrations, and hands-on exercises using realistic business scenarios. Shadowing and reverse-shadowing activities reinforce training and allow participants to observe

experienced personnel performing operational tasks and then execute those tasks under guided supervision. Knowledge validation exercises and readiness assessments help confirm that learning objectives were achieved and identify any areas requiring additional support.

To promote ongoing learning, we maintain training materials, recorded sessions, job aids, and reference guides within the knowledge repository. These resources remain accessible throughout the transition process and afterwards as reference materials, supporting long-term knowledge retention and operational success.

## Transition Execution

We follow a structured transition methodology that gradually transfers knowledge and operational responsibility while maintaining service continuity.

**Phase 1 – Knowledge Transfer.** We provide formal training sessions and documentation reviews to establish foundational knowledge.

**Phase 2 – Shadowing.** Participants observe Conduent personnel performing operational, administrative, and support activities.

**Phase 3 – Reverse Shadowing.** Participants perform activities while Conduent personnel provide guidance, mentoring, and oversight.

**Phase 4 – Operational Validation.** Participants demonstrate proficiency through execution of operational and administrative tasks within the solution.

**Phase 5 – Transition Completion.** Following successful validation, operational responsibilities are formally transferred, and transition activities are completed.

This phased approach reduces risk while providing participants with progressively greater operational responsibility and confidence.

## Deliverables and Outcomes

As part of the Knowledge Transfer Plan, we provide the documentation, training resources, and transition artifacts necessary to support a successful transfer of knowledge and operational responsibility. Key deliverables include:

- MDR Hardware and Software Inventory
- Knowledge Transfer Plan
- Training curriculum and schedule
- Training materials
- User guides
- Operational and technical documentation
- Recorded training sessions
- Readiness assessment reports
- Transition checklists
- Transition completion report

Together, these deliverables provide the State with a comprehensive knowledge base and proven transition framework that preserves institutional knowledge, supports operational continuity, and minimizes transition risk. The result is a well-prepared organization capable of successfully managing and operating the MDR solution while maintaining continuity of critical rebate administration functions.

## Summary

By maintaining current documentation, delivering role-based training, validating readiness, and executing a structured transition process, Conduent equips DHHS with the knowledge and resources needed to assume system management responsibilities. This approach supports operational continuity and reduces transition risk whenever knowledge transfer activities are required.



Submitted by: **Conduent State Healthcare, LLC**

CONDUENT

**Response to Request for Proposal**

# Medicaid Drug Rebate System (MDR)

## for the State of Nebraska, Department of Health and Human Services (DHHS)

Due Date: **August 6, 2026** | RFP Number: **124528 ON**

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**REQUIREMENT: RFP Section VI.A.2.II.D**

d. Narratives Requested in Section V.

## VI.A.2.II.d.1 Project Initiation and Planning Narrative [RFP V.D.2]

**REQUIREMENT: RFP Section V.D.2**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, Vendor must integrate such tasks into their solution to be performed accordingly. DHHS preference is the use of Microsoft Project or other state-approved software. Must include acceptance of Microsoft Project and/or recommended software for implementation.

Develop and create all plans as outlined herein subsections a through j. and submit for DHHS review and acceptance no later than three (3) weeks after the Kickoff. If DHHS does not accept the plan(s) in part or in its entirety, the vendor shall make proposed modifications and/or suggested changes accordingly. Such proposed modifications and/or suggested changes shall be at no additional cost to DHHS. Each developed plan must be maintained throughout the project lifecycle. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b)(vi)).

a. Develop a Detailed Project Plan (Work Breakdown Structure (WBS) Provide detailed and comprehensive Master Project Plan WBS for review and approval no later than three (3) weeks after the Kickoff. Must include Integrated Master Project Schedule based on the Master Project Plan. The Integrated Master Project Schedule shall identify:

i. All of the activities and tasks required to implement the MDR Project (to the extent Vendor can identify all such tasks and activities).

ii. The work breakdown structure.

iii. Team identification for each task/activity, role assignments by title.

iv. All dependencies, sub-tasks, successors & predecessors.

v. Timeline must detail start and end dates for task/activity completion.

vi. Estimated hours for each task & sub-task (including key tasks and dependencies)

vii. Discuss any tasks in “critical path” of project that may cause delays based on expertise and estimated impact to the overall project schedule.

b. Develop a Project Management Plan Provide detailed and comprehensive Project Management Plan for review and approval no later than three (3) weeks after the Kickoff. Executive Summary The Project Management Plan shall at minimum include the following components:

i. Executive Summary

ii. Risk/Issue Management

iii. Deliverable Management

iv. Communication Management

v. Staffing Management

vi. Change Management

vii. Quality Management

viii. Scope Management

ix. Schedule Management

x. Performance Management

c. Develop a Risk & Issue Management Plan

Provide detailed and comprehensive Risk & Issue Management Plan for review and approval no later than three (3) weeks after the Kickoff. The plan should identify, evaluate, and plan for possible risks that may arise within the project so that risk-handling activities are prepared in advance mitigating adverse impacts on achieving objectives. The plan will also outline the process of identifying, tracking, and resolving issues that arise throughout the project lifecycle.

The key aspects of the plan should include the following:

i. Risk Identification and Mitigation Process.

ii. Issue Management Process.

iii. Describe the process of prioritizing, tracking, escalating, communicating, and reporting risks and issues.

iv. Provide the approach to documenting, reporting, and resolving risks and issues identified by the vendor, the DHHS, or other stakeholders.

v. Roles and Responsibilities.

vi. Define roles and responsibilities for those responsible for risk and issue management.

vii. Impact Matrix.

viii. Define the impact matrices that will be used to analyze, evaluate, and prioritize risks and issues.

d. Deliverable Review and Approval Process (DRAP):

Develop a detailed and comprehensive Deliverable Review and Approval Process. The Deliverables Review Process defines how deliverables are: submitted for review; reviewed; commented on; how requests for changes are managed; the schedule for review; the schedule for updates; and deliverable acceptance. The State reserves the right to make the final decisions on the DRAP.

Deliverable Expectation Document (DED):

i. Provide DED for each written Deliverable. The DED must be submitted for State's review and approval no later than 30 calendar days before the written Deliverable is due for submission to the State.
ii. Deliverables submitted without DED review and acceptance will not be compensated.
Revision of deliverables, if required, must use DHHS review findings to meet content and format requirements. DHHS written acceptance and approval is required for all final deliverables and release of payment. A project phase is not considered complete until DHHS has approved all phase-specific deliverables.
Deficiencies relating to deliverables will initiate discussion and possible investigation to determine source of deficiency. Penalties associated with deficiencies are referenced in Attachment D – MDR Performance Guarantees.
e. Develop a Communication Plan
Provide a detailed and comprehensive Communication Plan for review and approval no later than three (3) weeks after the Kickoff meeting. The communication plan will outline how important information will be communicated to stakeholders throughout the project. Develop stakeholder register and communication list in collaboration with DHHS outlining key personnel, software for communication and routine schedule.
The key aspects of the plan should include the following:
i. Target Audiences
a. Identify the specific groups of people who need to be informed about the project, such as team members, clients, sponsors, and external stakeholders.
ii. Communication Objectives
a. Specify the objectives to be achieved for each communication.
iii. Communication Channels
a. Identify the most appropriate communication channels for each target audience.
iv. Communication Schedule
a. Determine the frequency and timing of communication for each target audience.
v. Communication Responsibilities
a. Define who is responsible for communicating with each target audience.
vi. Feedback Mechanisms
a. Set up channels for receiving feedback from stakeholders.
f. Develop a Staffing Plan
Provide a detailed and comprehensive Staffing Plan for review and approval no later than three (3) weeks after the Kickoff. The staffing plan will outline the human resource needs of the project and how those needs will be met. Propose a staffing approach that aligns with DHHS business requirements associated with this RFP.
The key aspects of the plan should include the following:
i. Staffing Process - Describe how staffing levels will achieve service regardless of changes that may influence work volume. Include the process of temporarily and permanently replacing vacancies in key/non-key personnel.
ii. Roles and Responsibilities - Define the roles and responsibilities by resource type, including identifying key and non-key personnel as well as resource allocation for all personnel. Provide details that differentiate by vendor staff, and subcontractor staff, if applicable.
iii. Resource Calendars - Identify total hours to be expended, per phase, and for the entire project, by vendor staff and subcontractor staff, if applicable.
iv. Background Checks – maintain auditable records for all completed background checks for all individuals assigned to project. This action must occur for any new staff that are assigned throughout the duration of the contract.
v. Performance Issues - DHHS reserves the right to request removal of staff. The vendor must provide an acceptable replacement within ten (10) business days of the notice of this release.
vi. Staffing Plan Changes - If there are any changes in key personnel, the vendor is expected to notify DHHS in writing at least fourteen (14) days prior to the change, except in the case of immediate risk to the health and safety of project staff, or in the case of unlawful security breaches. The vendor's key personnel positions may not be vacant for more than ten (10) business days without a qualified substitute (temporary replacement). A qualified substitute must be in place no more than ten (10) State business days after the separation date of the vacating resource. The vendor may not fill vacant key personnel positions with other existing key personnel without approval by DHHS. DHHS will also have the authority to approve proposed replacements of key personnel by the vendor.
Vendor should provide competent and experienced staff to meet all key personnel positions for both MDR implementation and operations, and ensure full compliance with project requirements as the solution is implemented and deployed.
g. Key Personnel
Key Personnel during Implementation:
i. Account Manager
ii. Project Manager
Key Personnel during Operations, including but not limited to:
iii. Account Manager
Account Manager must be the single point of contact for matters concerning performance under the Contract. Account Manager must have the authority to make decisions that are binding to the Contract, held responsible for timely completion of the deliverables for the project, and shall be responsible for meeting all contractual obligations. Include the approach to account management and describe how the account manager will meet this requirement.
Account Manager minimum qualifications:
i. A minimum of five (5) years' contract management experience managing related services with similar budgets, preferably in Medicaid or the healthcare industry and for a project similar in size and scope to this project.

ii. Minimum five (5) years' experience managing activities related to contract administration, correspondence with project clients, dispute resolution, personnel issues, and project reporting.
iii. Minimum five (5) years' experience leading and coordinating project implementation activities, to include evaluation, training, reporting, and recommendations.
iv. Minimum five (5) years' experience conducting project analysis and consultation of marketplace and impact changes.
v. Minimum five (5) years' experience providing project consultation and coordinating changes for major initiatives.
Project Manager must represent and oversee the day-to-day activities of the project. Serve as DHHS's primary point of contact for matters relating to the project and serve as a liaison for project stakeholders.
DHHS preference is the use of Microsoft Project or other state-approved software. Project Manager must include acceptance of Microsoft Project and/or recommended software for managing daily activities.
Project Manager minimum qualifications:
i. A minimum of five (5) years' project management experience managing projects of similar size and scope, preferably in Medicaid or the healthcare industry, within the last three (3) years from the release date of the RFP.
ii. Minimum five (5) years' experience managing Systems Development Life Cycle (SDLC) for projects of similar size and scope of this RFP.
iii. Minimum five (5) years' experience initiating and managing an MDR system implementation, or comparable experience with capabilities of overseeing all contracted activities in a project of similar size and scope of this RFP.
iv. Project Management Professional (PMP) certification through the Project Management Institute (PMI) is preferred.
h. Develop a Change Management Plan
Provide a detailed and comprehensive Change Management Plan for review and approval no later than three (3) weeks after the Kickoff. The change management plan will outline the process for change management throughout the project lifecycle, including how to submit a change request and how those requests are assessed.
The key aspects of the plan should include the following:
i. Change Management Process detailing the process of submitting, evaluating, authorizing, managing, and controlling change requests.
ii. Roles and Responsibilities - define individual titles and responsibilities within the project.
iii. Change Request Form Template for submitting changes.
iv. Change Log Template to track all submitted changes and outcomes.
i. Application Configuration and Maintenance Plan
Provide a detailed and comprehensive Application Configuration and Maintenance Plan for review and approval prior to the beginning of configuration activities.
The key aspects of the plan shall include the following:
i. Approach to conducting design sessions or walkthroughs.
ii. Approach to conducting sprints or iterations.
iii. Configuration management.
iv. Release cycle and frequency.
v. Tasks, timelines, and responsible parties for design and configure/build tasks.
vi. Approach to system enhancements.
vii. Programming and coding standards.

***Project Initiation and Planning is where Conduent and DHHS turn the RFP, contract requirements, and State priorities into a clear roadmap for the MDR implementation.***

During this phase, we confirm the work to be performed, how it will be sequenced, who is responsible, where dependencies exist, and which decisions and approvals are needed to keep the implementation moving. The phase establishes the foundation for requirements validation, configuration, interfaces, data conversion, testing, training, CMS certification, deployment, and transition to operations.

This work establishes the schedules, responsibilities, communication paths, review processes, and project controls used throughout implementation. It also gives Conduent and DHHS a shared view of upcoming activities, critical milestones, resource needs, external dependencies, and potential schedule risks.

Within three weeks of Project Kickoff, Conduent submits required plans and processes to DHHS for review and acceptance. We revise any plan not accepted by DHHS at no additional cost and maintain approved plans throughout the project lifecycle. Subsequent updates follow the approved Change Management Plan.

Conduent accepts Microsoft Project as the primary tool for managing implementation activities and supports another DHHS-approved tool if directed by the State. We use the approved platform to manage the Project Work Plan, assign resources, coordinate the Integrated Master Schedule, track milestones and dependencies, monitor the critical path, and report project performance.

## a. Detailed Project Plan and Work Breakdown Structure (WBS)

Conduent develops a Detailed Project Plan, also referred to as the Project Work Plan, and Work Breakdown Structure (WBS) that serve as the foundation for managing project scope, schedule, resources, deliverables, dependencies, and milestones throughout implementation. Conduent uses the Project Work Plan and WBS to organize, track, and manage project work and establish accountability for task completion. Together, they provide DHHS with clear visibility into project progress, responsibilities, dependencies, resource needs, and critical milestones.

### *Project Planning Approach*

Conduent begins with a preliminary Project Work Plan developed during proposal preparation based on the RFP requirements, proposed implementation approach, deliverables, milestones, dependencies, and staffing assumptions. Following Project Kickoff, we review the draft schedule with DHHS to validate the scope, activity sequencing, State and Conduent responsibilities, review periods, decision dates, resource availability, and external dependencies.

We incorporate DHHS feedback and refine task durations, estimated hours, start and finish dates, predecessors, successors, and critical-path relationships. After DHHS approves the plan, we establish the schedule baseline in Microsoft Project and maintain it throughout implementation to track progress, evaluate variances, forecast milestone completion, and identify activities that may affect the implementation timeline.

#### *Activities and tasks to implement MDR*

Conduent develops a comprehensive Project Work Plan and supporting WBS that identify all implementation activities, including project management, project governance, requirements validation, design sessions, configuration activities, integration activities, development activities, testing activities, data conversion and migration, training, operational readiness, CMS certification support, implementation, post-implementation support, and transition to operations. We also incorporate additional activities identified with DHHS during planning that are needed to meet the requirements and deliver full functionality. Activities are decomposed to the task and subtask level to provide complete visibility into project execution.

Within three (3) weeks of Project Kickoff, we develop and submit a comprehensive Master Project Plan and Integrated Master Project Schedule using Microsoft Project. The Project Work Plan manages the detailed MDR implementation activities, while the IMS aligns those activities with applicable DHHS, external vendor, interface partner, shared-environment, and CMS dependencies.

### *Work Breakdown Structure Components*

Conduent's Project Manager develops a hierarchical WBS aligned to project phases, workstreams, activities, deliverables, milestones, tasks, and subtasks. The WBS organizes the full MDR implementation scope into manageable pieces, including Nebraska-specific configuration, interfaces, rebate data conversion, reporting, testing, training, operational readiness, and CMS certification activities.

WBS numbering identifies the relationship of activities within the project hierarchy. Detailed tasks roll up to their related workstream, project phase, deliverable, and/or implementation milestone, allowing DHHS to see how individual activities contribute to overall project completion.

Each WBS element identifies the work to be completed, responsible role, estimated effort, timing, dependencies, and expected output. Where applicable, it also identifies the associated requirement, predecessor and successor activities, DHHS participation, review or approval point, and completion criteria. The Project Manager reviews the WBS with responsible leads to confirm the work to be completed, proper sequencing, and assigned owners before the schedule is baselined. As scope is refined, approved changes are incorporated into the WBS and carried through to the Project Work Plan, IMS, resource assignments, and project reporting.

### *Integrated Master Project Schedule*

Conduent incorporates the detailed MDR Project Work Plan into an Integrated Master Project Schedule that provides a coordinated view of implementation across the broader Nebraska Medicaid environment. The IMS identifies internal and external activities, shared milestones, dependencies, decision dates, and events that may affect the MDR schedule or critical path.

Table VI.A.2.II.d.1-1 summarizes the information maintained in the Project Work Plan and incorporated, as applicable, into the Integrated Master Project Schedule.

**Table VI.A.2.II.d.1-1. Project Work Plan and Integrated Master Project Schedule Components**

| Items | Tasks |
|---|---|
| i. Project Activities and Tasks | Planning activities; requirements workshops; design reviews; development sprints; integration activities; data conversion cycles; testing events; training sessions; CMS certification support activities; Go-Live readiness reviews; and applicable DHHS, external-vendor, and interface-partner activities |
| ii. Work Breakdown Structure | Each task rolls up into a hierarchical WBS structure with summary and detailed task levels aligned to project phases and workstreams. |
| iii. Team Identification and Role Assignments | Each task identifies the responsible team, assigned role by title, accountable manager, and supporting stakeholders. Examples include the Project Manager, Business Analyst, Technical Architect, Configuration Lead, Data Conversion Lead, Testing Manager, Training Lead, Security Lead, and DHHS subject matter experts. |
| iv. Dependencies and Relationships | Subtasks, predecessors, successors, interdependencies, external dependencies, data dependencies, and approval dependencies |
| v. Schedule Dates | Every task and milestone includes a planned start date, planned finish date, duration, applicable review or approval period, and milestone completion date. |

| Items | Tasks |
|---|---|
| vi. Resource Hours | The schedule identifies estimated effort hours for each task and subtask, including key tasks and dependencies, by project phase, major workstream, detailed task, and resource assignment. |
| vii. Critical Path Analysis | We conduct ongoing Critical Path Method analysis to identify activities that could affect the MDR implementation schedule. Potential critical-path items include requirements approval, interface development, data conversion validation, UAT, CMS certification activities, and Go-Live readiness approval. For each critical-path activity, we identify the estimated effect on the overall schedule, risk likelihood, potential delay impacts, mitigation strategy, contingency plan, and recovery actions. |

## b. Project Management Plan

Within three (3) weeks after Project Kickoff, Conduent submits a comprehensive Project Management Plan (PMP) to DHHS for review and approval. The PMP serves as the primary governance document for the MDR implementation and defines how Conduent and DHHS manage project decisions, responsibilities, deliverables, communications, resources, changes, quality, scope, schedule, and performance. It incorporates or references the more detailed management plans and processes described in the following subsections.

The Project Manager develops the initial PMP based on the contract, approved project organization, Project Work Plan, governance approach, and implementation responsibilities. Conduent reviews the draft with DHHS to confirm decision authorities, reporting expectations, management processes, and State participation. We incorporate DHHS feedback, establish the approved version as the project baseline, and maintain the PMP throughout implementation.

Table VI.A.2.II.d.1-2 provides a description of each section of the PMP and the management activities addressed within that section.

**Table VI.A.2.II.d.1-2. Project Management Plan Components and Management Activities**

| PMP Section | Tasks |
|---|---|
| Executive Summary | Defines the project vision, business objectives, implementation strategy, project governance framework, success measures, and high-level milestones. |
| Risk and Issue Management | Defines risk identification, assessment, mitigation, issue escalation, scoring, ownership, reporting, and RAID log management. The PMP references the detailed Risk and Issue Management Plan described in subsection c. |
| Deliverable Management | Establishes procedures for deliverable planning, development, internal quality review, submission, DHHS review cycles, comment resolution, revision, and acceptance. The PMP references the DRAP and DED requirements described in subsection d. |
| Communication Management | Defines executive and project reporting, meeting cadence, communication channels, escalation communications, stakeholder engagement, and feedback mechanisms. The PMP references the detailed Communication Plan described in subsection e. |
| Staffing Management | Defines resource assignments, workforce planning, resource availability, contingency staffing, replacement procedures, and resource transition management. The PMP references the Staffing Plan described in subsection f. |
| Change Management | Defines change request submission, impact assessment, review, authorization, Change Control Board governance, implementation, verification, and approval workflows. The PMP references the detailed Change Management Plan described in subsection h. |

| PMP Section | Tasks |
|---|---|
| Quality Management | Defines quality standards, responsibilities, review checkpoints, deliverable controls, corrective actions, and continuous improvement activities. |
| Scope Management | Defines scope validation, requirements traceability, scope monitoring, variance identification, and governance for proposed scope changes. |
| Schedule Management | Defines Project Work Plan and IMS maintenance, progress updates, milestone tracking, schedule variance analysis, critical-path monitoring, forecasting, and recovery planning. |
| Performance Management | Defines how project performance is monitored and reported using schedule measures, deliverable status, defect trends, risk and issue measures, quality indicators, and project health dashboards. |

The Project Manager uses the PMP to guide day-to-day project management and evaluates it as project conditions, responsibilities, or approved processes change. Updates follow the approved Change Management Plan and are communicated to affected DHHS and Conduent stakeholders.

## c. Risk and Issue Management Plan

Within three weeks after Project Kickoff, Conduent submits a Risk and Issue Management Plan to DHHS for review and approval. The plan defines how risks and issues are identified, assessed, tracked, mitigated, escalated, reported, and resolved. It also defines roles, documentation requirements, reporting frequency, escalation thresholds, and closure criteria.

### *Risk Identification and Mitigation Process*

Conduent identifies risks through planning workshops, stakeholder discussions, weekly reviews, technical assessments, and governance meetings. We also review the schedule, interfaces, data conversion, testing, security, and operational readiness activities for emerging risks. DHHS, Conduent, and other stakeholders may submit risks at any time.

We record each risk in the centralized risk, action, issue, and decision (RAID) repository. The record includes the risk description, affected area, likelihood, impact, priority, owner, mitigation actions, target dates, triggers, and contingency actions.

The assigned owner monitors the risk and completes the mitigation actions. Changes in likelihood, impact, or status are reported during project reviews. When a risk occurs, Conduent converts it to an issue and begins the required response.

### *Issue Management Process*

Conduent logs an issue when a condition is already affecting the project or requires immediate action. Issues may affect scope, schedule, cost, quality, technical performance, compliance, or operations.

Each issue receives an owner, priority, target resolution date, corrective actions, and escalation path. Functional and technical leads manage issues within their areas. The Project Manager monitors progress and coordinates actions across teams. Items requiring leadership or State decisions are escalated to DHHS.

An issue is closed only after the resolution and supporting evidence are documented.

## *Prioritization, Escalation, Communication, and Reporting*

Conduent evaluates each risk and issue across five impact areas:

1. Schedule
2. Cost
3. Operations
4. Compliance
5. Stakeholders

We use impact, likelihood, and level of control to assign a Low, Medium, High, or Critical priority. The rating determines the response timeframe, reporting frequency, and escalation path.

Low- and Medium-priority items are generally managed by the responsible lead personnel. High- and Critical-priority items receive increased Project Manager oversight. Critical items are escalated to executive leadership and DHHS without waiting for the next scheduled meeting.

The RAID repository serves as the source of record. It captures assessments, owners, dates, actions, decisions, status, and closure evidence. Conduent reviews open items during weekly project meetings. Status reports and dashboards identify new risks and issues, priority changes, overdue actions, escalations, and potential milestone impacts.

## *Roles and Responsibilities*

The Executive Sponsor provides strategic direction and supports resolution of escalated matters. The Project Director, or similar role, oversees program performance and governance. The Project Manager maintains the RAID repository and coordinates reviews, reporting, and escalation.

Functional and technical leads manage items within their areas. DHHS stakeholders provide input, validate impacts, and participate in decisions. Each risk and issue has one accountable owner.

Figure VI.A.2.II.d.1-1 illustrates the prioritization, documentation, ownership, reporting, and escalation process.

[redacted]

**Figure VI.A.2.II.d.1-1. [redacted]**

Conduent maintains the Risk and Issue Management Plan and RAID repository throughout implementation. Changes to the approved process follow the Change Management Plan.

## d. Deliverable Review and Approval Process (DRAP)

Conduent establishes the Deliverable Review and Approval Process (DRAP) with DHHS during project initiation and planning. The DRAP defines how written deliverables are developed, internally reviewed, submitted, reviewed by DHHS, revised, approved, and maintained. It also identifies review participants, responsibilities, submission methods, comment-resolution procedures, review schedules, and acceptance authority. DHHS retains final approval of the DRAP.

Our standard 10-5-5 review cycle provides:

- 10 business days for DHHS's initial review and comments
- Five business days for Conduent to evaluate comments, revise the deliverable, and document each response
- Five business days for DHHS's final review and acceptance

Conduent and DHHS may adjust the review cycle for a specific deliverable based on its size, complexity, dependencies, or required approval date. The agreed review periods are reflected in the Project Work Plan and applicable Deliverable Expectation Document.

### *Deliverable Expectation Documents*

For each written deliverable, Conduent prepares a Deliverable Expectation Document (DED). The DED defines the deliverable's purpose, scope, required content and format, assumptions, dependencies, acceptance criteria, review participants, approval requirements, and submission schedule.

Conduent submits the DED to DHHS for review and approval at least 30 calendar days before the written deliverable is due. The approved DED establishes the baseline used to develop, internally review, and evaluate the deliverable. We understand that deliverables submitted without prior DED review and acceptance will not be compensated.

### *Internal Quality Review*

Before submitting a written deliverable to DHHS, Conduent reviews it against the approved DED, applicable contract requirements, project decisions, and document standards. A peer reviewer evaluates the content for technical accuracy, completeness, consistency, and alignment with the approved project approach.

A separate document quality assurance review checks organization, readability, grammar, formatting, references, version control, and use of the required template, if applicable. The deliverable owner addresses identified corrections before the Project Manager confirms that the document is ready for submission. Conduent retains the completed review records in the project repository.

### *Revision Management*

Conduent submits each deliverable according to the approved Project Work Plan and DED. We record DHHS comments and document the disposition of each comment. Conduent evaluates the requested changes, updates the deliverable, and records how each comment was addressed.

When clarification is needed, Conduent meets with DHHS reviewers before completing the revision. We then resubmit the updated deliverable and comment-resolution log for final review under the agreed review cycle.

DHHS written acceptance is required for each final deliverable and the associated release of payment. No project phase is complete until DHHS has approved all phase-specific deliverables. When DHHS identifies a deficiency, Conduent and DHHS discuss the finding and, when warranted, investigate its source. Conduent completes the required correction and resubmits the deliverable.

## e. Communication Plan

Conduent submits a Communication Plan to DHHS for review and approval. We develop the plan with DHHS so that project information reaches the right stakeholders at the right time and through the appropriate channel.

The Communication Plan includes a stakeholder register and communication list. These identify key DHHS, Conduent, vendor, and external stakeholders. The plan records each stakeholder's role, information needs, communication owner, preferred channel, distribution method, and required frequency.

### *Target Audiences and Communication Objectives*

Conduent identifies the audiences that need information about project progress, decisions, risks, issues, deliverables, and upcoming activities. Audiences may include executive sponsors, the Project Steering Committee, business owners, technical stakeholders, operations teams, interface partners, and end users.

Each communication has a defined objective. Common objectives include reporting progress, supporting decisions, coordinating dependent activities, raising risks or issues, confirming responsibilities, and preparing stakeholders for upcoming milestones, including go live.

### *Communication Channels and Schedule*

The plan identifies the appropriate communication channel for each audience and purpose. Channels may include Microsoft Teams, email, status reports, project dashboards, governance meetings, working sessions, document repositories, and newsletters.

The communication schedule defines the timing and frequency of each activity. Typical communications include weekly project status meetings, weekly project management meetings, monthly steering committee meetings, executive briefings, deliverable review sessions, and ad hoc escalation meetings. The Project Work Plan includes recurring meetings and time-sensitive communication activities.

## *Communication Responsibilities*

The Communication Plan assigns a responsible owner for each communication. The owner prepares the information, confirms the appropriate audience, distributes it through the approved channel, and records decisions or follow-up actions. The plan identifies the communication type, owner, audience, frequency, timing, and distribution method.

The Project Manager manages the overall communication schedule and coordinates project-level reporting. The Account Manager leads executive and contract communications. Functional and technical leads provide updates for their workstreams and raise items requiring broader attention. DHHS identifies State recipients, decision-makers, and approval authorities and provides direction on State communication needs.

## *Feedback Mechanisms*

Conduent gathers stakeholder feedback through workshops, surveys, status meetings, governance sessions, deliverable reviews, and direct discussions. We document feedback, decisions, and follow-up actions in the appropriate project record.

The Project Manager reviews communication effectiveness throughout implementation. When audiences, responsibilities, schedules, or information needs change, Conduent updates the plan with DHHS. Changes to the approved plan follow the Change Management Plan.

Figure VI.A.2.II.d.1-2 summarizes the audiences, objectives, channels, schedules, responsibilities, and feedback mechanisms documented in the Communication Plan.

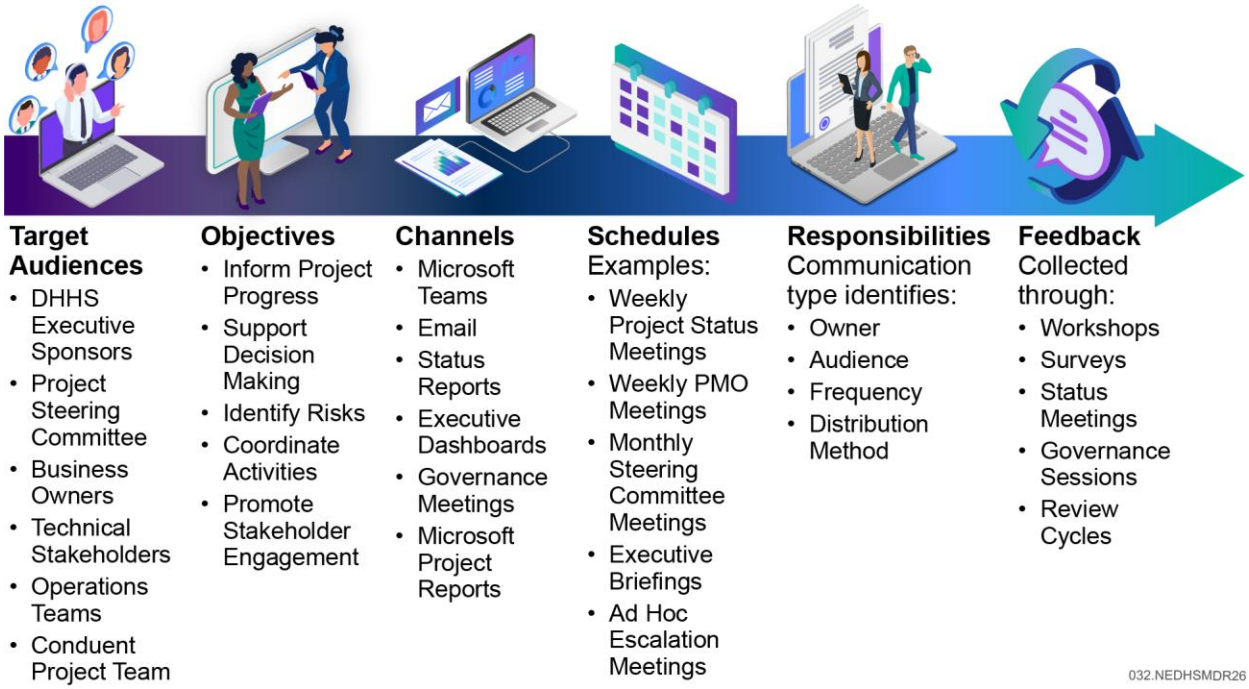



**Figure VI.A.2.II.d.1-2. Conduent's Communication Plan**
*Defined audiences, communication objectives, scheduled interactions, accountable owners, and feedback channels support timely project coordination.*

## f. Staffing Plan

Conduent develops a Staffing Plan that aligns qualified resources to project activities, deliverables, milestones, and operational responsibilities. Within three weeks after Project Kickoff, we submit the plan to DHHS for review and approval. We use the plan to monitor staffing levels, resource assignments, availability, and projected demand across each project phase.

### *Staffing Process*

Conduent reviews staffing needs against the RFP and Contract, Project Work Plan, upcoming deliverables, workload forecasts, and operational demands. We adjust resource assignments when workload changes or specialized expertise is needed. This supports adequate coverage, timely deliverables, and completion of project milestones without disrupting service.

The Staffing Plan identifies backup resources and the process for filling temporary and permanent vacancies. Conduent may use trained backup personnel, internal resource pools, and prequalified staffing candidates to address changing needs. The process applies to both key and non-key positions.

**Table VI.A.2.II.d.1-3. Staffing Plan Components**

| Staffing Plan Component | Description |
|---|---|
| Staffing Process | Describes how Conduent monitors workload, staffing demand, and resource availability throughout implementation and operations. It defines how staffing levels are adjusted without disrupting service and how temporary and permanent vacancies in key and non-key positions are filled. |
| Roles and Responsibilities | Identifies key and non-key personnel and defines responsibilities by role and resource type. The plan distinguishes Conduent staff from subcontractor staff, if applicable, and identifies resource allocation for all assigned personnel. |
| Resource Calendars | Identifies planned availability, allocation, and estimated hours by individual or role. Resource calendars include total hours by project phase and for the full project for Conduent and subcontractor personnel, if applicable. |
| Backup and Replacement Resources | Identifies trained backups, temporary replacements, internal resource pools, and candidate pipelines used to respond to workload changes, absences, or vacancies. The plan addresses both temporary coverage and permanent replacement. |
| Background Checks | Documents required background screening for all personnel assigned to the project. Conduent maintains auditable records and completes the required screening for personnel added at any point during the contract. |
| Performance Issues and DHHS-Requested Removal | Defines the process used when DHHS requests removal of assigned personnel. Conduent removes the individual as directed and provides a qualified replacement acceptable to DHHS within 10 business days of notice. |
| Key-Personnel Changes | Requires written notice to DHHS at least 14 days before a planned key-personnel change, except when immediate health, safety, or unlawful security concerns apply. |
| Vacancy Coverage | Requires a qualified temporary replacement within 10 State business days of a key-personnel separation. A key position does not remain vacant beyond the contractual timeframe. |
| Replacement Approval | Provides DHHS with authority to review and approve proposed key-personnel replacements. Conduent does not use another existing key person to fill a vacant key position without prior DHHS approval. |
| Implementation and Operations Coverage | Identifies qualified and experienced personnel required for both MDR implementation and ongoing operations, including planned transitions and continuity between the two periods. |

## *Staffing Plan Changes*

When a key-personnel vacancy occurs, Conduent places a qualified temporary replacement within 10 State business days of the separation date. A key position does not remain vacant for more than 10 business days without a qualified substitute. Conduent does not assign an existing key person to fill another vacant key position without prior DHHS approval.

We coordinate permanent replacement activities with DHHS and provide the proposed candidate's qualifications for review. Approved changes are reflected in the Staffing Plan, resource calendars, Project Work Plan, responsibility assignments, and project communications.

Conduent maintains qualified and experienced personnel for both MDR implementation and operations. We review the Staffing Plan throughout the contract and update it as workload, project phases, resource assignments, or operational needs change.

## g. Key Personnel

Conduent assigns experienced leaders to manage contract performance and day-to-day delivery throughout the MDR implementation. The Account Manager provides executive and contractual oversight, while the Project Manager directs daily project activities. Together, they coordinate decisions, resolve escalated matters, and maintain alignment between DHHS expectations and project execution.

### *Account Manager,* [redacted]

Our Account Manager serves as DHHS's single point of contact for matters concerning performance under the Contract during implementation and operations. He has the authority to make decisions that are binding on Conduent under the Contract and is accountable for timely deliverable completion and fulfillment of contractual obligations.

Responsibilities include:

- Contract oversight and administration
- Executive stakeholder communication
- Deliverable and contractual accountability
- Performance monitoring and reporting
- Escalation and dispute resolution
- Personnel and service concerns
- Coordination of changes affecting major initiatives
- Consultation on marketplace or program changes that may affect the MDR solution

[redacted] works with the Project Manager and operational leads to monitor commitments, address concerns, and communicate project or contract matters requiring executive attention. He also maintains continuity as the project transitions from implementation to ongoing operations. [redacted] Fernandes exceeds all required qualifications and possesses extensive Medicaid and healthcare contract management experience.

### *Project Manager,* [redacted]

Our Project Manager serves as DHHS's primary day-to-day contact for the MDR implementation and as the liaison among DHHS, Conduent teams, vendors, and other project stakeholders. She directs project execution and coordinates the activities needed to meet approved scope, schedule, quality, and deliverable commitments. [redacted] has earned her Project Management Professional certification through the Project Management Institute.

Responsibilities include:

- Project Work Plan and schedule management
- Resource and workstream coordination
- Risk and issue management
- Scope and change control
- Status reporting and governance support

- Deliverable and quality oversight
- SDLC coordination
- Dependency, milestone, and critical-path management
- Escalation of matters requiring DHHS or executive decisions

[redacted] meets the required qualifications and brings extensive experience managing Medicaid system implementations and related SDLC activities.

The Project Manager accepts and uses Microsoft Project as DHHS's preferred scheduling tool, or another State-approved tool if directed, to manage:

- The Project Work Plan and Integrated Master Schedule
- Resource assignments and estimated effort
- Task relationships and external dependencies
- Milestones and approval dates
- Progress against the approved baseline
- Critical-path activities and forecast impacts

The Project Manager reports project status to DHHS, coordinates corrective actions when performance varies from plan, and works with the Account Manager on matters that affect contract performance or require executive attention.

## h. Change Management Plan

Conduent submits a Change Management Plan to DHHS for review and approval within three weeks of the project start date. The plan defines how proposed changes are submitted, evaluated, authorized, implemented, tracked, and closed throughout the project lifecycle. It also defines decision authority, required documentation, responsible roles, and the information maintained in the Change Log.

### *Change Management Process*

A proposed change begins with a completed Change Request Form. The request describes the change, business need, affected requirements or deliverables, requested timing, and expected outcome. The Project Manager reviews the request for completeness and records it in the centralized Change Log.

Conduent then evaluates the effect of the proposed change. The assessment considers:

- Scope and requirements
- Schedule, milestones, and dependencies
- Cost, staffing, and resource needs
- Solution design, interfaces, data, and security
- Testing, training, operations, and CMS certification
- Contract commitments and project risk

The Project Manager coordinates input from the appropriate functional and technical leads. The assessment documents available options, recommended actions, and any effect on the Project Work Plan or IMS.

The DHHS Change Control Board reviews the request and impact assessment to determine if the change should proceed. Based on the decision, the request is approved, rejected, deferred, or returned for additional information. No change affecting approved scope, schedule, cost, or deliverables is implemented until the required DHHS approval is documented.

### *Roles and Responsibilities*

The requestor explains the business need and provides the information needed to evaluate the change. The Project Manager manages the process, maintains the Change Log, coordinates the impact assessment, and routes the request for decision.

The affected functional or technical leads evaluate the proposed solution and downstream effects. The Account Manager addresses contractual or financial considerations when applicable. DHHS reviews the business and program impact, leads the Change Control Board decisions, and provides required State authorization.

### *Change Request Form and Change Log*

The standardized Change Request Form captures the change description, business justification, requestor, affected requirements, impact assessment, recommendation, decision, and approval signatures.

The Change Log provides a current record of all submitted requests. It includes the change identifier, status, submission date, assigned owner, decision, implementation date, and final disposition. Supporting analyses, approvals, and implementation evidence are linked to the applicable Change Log entry.

### *Implementation, Verification, and Closure*

After approval, Conduent incorporates the change into the affected plans, requirements, designs, tasks, resource assignments, test cases, and release documentation. The responsible team implements and tests the change through the applicable SDLC and release-management processes.

Conduent verifies that the approved change was completed as authorized and did not create unintended effects. The Project Manager updates the Change Log and closes the request after implementation results and required approvals are documented.

Conduent maintains the Change Management Plan and Change Log throughout implementation. We update the plan when approved governance processes or responsibilities change.

Figure VI.A.2.II.d.1-4 summarizes the change process.



**Figure VI.A.2.II.d.1-4.**

## i. Application Configuration and Maintenance Plan

Prior to configuration activities, we submit a comprehensive Application Configuration and Maintenance Plan to DHHS for review and approval. It defines how configuration decisions are documented, baselined, tested, promoted between environments, and maintained throughout the project lifecycle.

Conduent develops the plan with DHHS and confirms the applicable tasks, release approach, responsible roles, dependencies, review points, and approval requirements. Configuration and development activities are incorporated into the Project Work Plan.

Table VI.A.2.II.d.1-4 describes the various processes and activities within the Plan.

**Table VI.A.2.II.d.1-4. Application Configuration and Maintenance Plan Components**

| Plan Section | Processes and Activities |
|---|---|
| Design Sessions and Walkthroughs | Conduent conducts requirements workshops, business process reviews, design walkthroughs, and solution validation sessions. We document decisions, open items, dependencies, and DHHS feedback. Approved decisions guide subsequent configuration and build activities. |
| Sprint and Iteration Approach | Where appropriate, configuration and development follow iterative cycles that include planning, configuration or development, unit testing, peer review, daily coordination, demonstrations, and retrospectives. DHHS reviews completed functionality and provides feedback during planned demonstrations and review sessions. |

| Plan Section | Processes and Activities |
|---|---|
| Configuration Management | Includes version control, release governance, configuration documentation, and audit tracking. Conduent maintains approved configuration baselines, records changes by environment, and controls the promotion of configuration and code between development, testing, UAT, and production. |
| Release Cycle and Frequency | The plan defines development, testing, UAT, production, and emergency releases. It also identifies the planned cadence, release content, readiness checks, approval points, release documentation, and known-issue reporting for each release type. |
| Tasks, Timelines, and Responsibilities | The plan identifies build and configuration activities, milestones, responsible resources, dependencies, and approval checkpoints. These activities are incorporated into the Project Work Plan with planned start and finish dates and assigned roles. |
| System Enhancement Approach | Enhancements follow the approved Change Management Plan. Each proposed enhancement is evaluated for its effect on requirements, design, configuration, interfaces, data, testing, schedule, cost, and operations before approval. Approved enhancements progress through the applicable design, build, testing, and release processes. |
| Programming and Coding Standards | When development is required, activities follow secure coding practices, CMS and Medicaid requirements, version-control procedures, peer-review standards, automated testing practices, and documentation standards. Developers complete unit testing and required reviews before code advances to formal testing. |
| Application Maintenance | Conduent maintains configuration records, release histories, technical documentation, known-issue information, and approved baselines. These records support troubleshooting, future changes, operational support, and transition from implementation to ongoing operations. |

The approved plan provides Conduent and DHHS with a shared roadmap for moving from approved design decisions through configuration, testing, release, and ongoing maintenance. It preserves traceability and control while allowing the solution to evolve through approved changes.

### VI.A.2.II.d.2 Requirements Validation and Demonstration Narrative [RFP V.D.3]

**REQUIREMENT: RFP Section V.D.3**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

***Conduent validates requirements, confirms solution fit, and establishes the approved baseline that guides design, configuration, and implementation.***

We use a collaborative, demonstration-driven methodology to confirm that CMdS Rebate Administration aligns with Nebraska's business requirements. These activities take place before design, configuration, and testing begin.

**Why Conduent**

- Demonstration-led validation workshops
- Solution capability and feature assessment
- Clear transition from validation to design, configuration, testing, and deployment

The CMdS Rebate Administration solution already supports most Medicaid rebate administration functions. Our focus is to validate how existing capabilities, configuration options, interfaces, and operational processes support the State's requirements.

This approach allows stakeholders to review system functionality and establish a shared understanding of future-state operations. Stakeholders validate process alignment, confirm user expectations, and identify Nebraska-specific configuration requirements. Demonstration-based validation reduces implementation risk, accelerates project execution, minimizes unnecessary customization, and establishes a strong foundation for design, interface development, data conversion, testing, implementation, and CMS certification activities.

Figure VI.A.2.II.d.2-1 illustrates how Conduent moves from initial planning and demonstrations through solution-fit assessment, requirements approval, and transition to Design and Configuration.




**Figure VI.A.2.II.d.2-1. Requirements Validation and Demonstration Methodology**
*We use a demonstration-driven approach to validate requirements, confirm solution fit, establish traceability, and prepare the State for Design and Configuration activities.*

## i. Coordinate and Lead Requirements Validation Meetings and Demonstrations

We begin Requirements Validation by conducting workshops with business, operational, technical, and program stakeholders. These workshops review business objectives, operational requirements, future-state expectations, critical business processes, and the requirements planned for each session. We also provide an initial overview of CMdS Rebate Administration functions, processes, and relevant performance characteristics.

We use live system demonstrations as the primary validation tool. Rather than relying solely on document reviews, our subject matter experts guide stakeholders through key rebate administration processes. These include invoicing, manufacturer communications, dispute management, payment reconciliation, reporting, workflow administration, security management, and audit controls. These demonstrations show how the solution supports daily operations and aligns with business requirements.

Demonstrations use representative business scenarios so DHHS can evaluate how related functions operate together. As applicable, we discuss processing volumes, batch timing, response expectations, interface dependencies, and other performance considerations that inform later design and testing activities.

As the team reviews requirements, we document feedback, validation results, decisions, and follow-up actions. We address questions during review sessions whenever possible. Items requiring additional research or decisions are assigned to the appropriate DHHS or Conduent resource and tracked through resolution.

## ii. Identify Required System Configuration Changes

During the workshops and demonstrations, Conduent evaluates each requirement against existing CMdS functionality. We determine whether the requirement is satisfied through standard functionality, system configuration, an interface, reporting, data conversion, or an operational procedure.

When configuration is needed, we document the affected workflow, business rule, security role, report, interface, system parameter, and dependency. We also identify potential effects on data conversion, testing, training, security, reporting, or ongoing operations. Approved findings become inputs to Design and Configuration activities and the Project Work Plan.

Because CMdS was developed for Medicaid rebate administration, most requirements are satisfied through existing functionality and standard configuration. Figure VI.A.2.II.d.2-2 shows how Conduent compares each requirement to existing CMdS capabilities and identifies the appropriate implementation path.

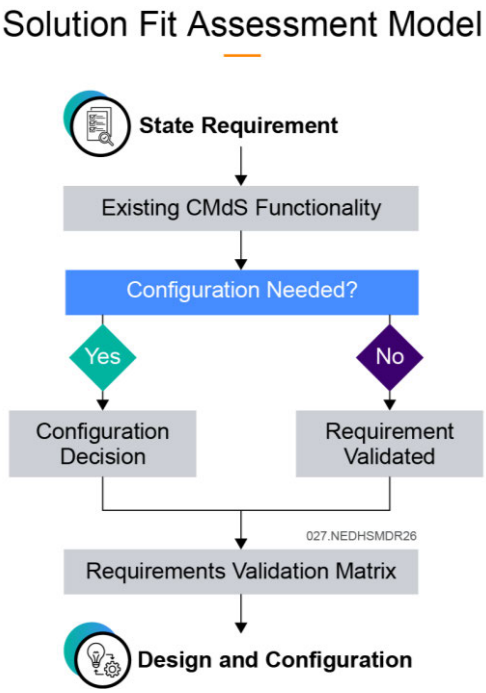



**Figure VI.A.2.II.d.2-2. Solution Fit Assessment**
*We evaluate requirements against CMdS functionality to identify configuration needs and minimize custom development.*

## iii. Identify Recommendations for Process Changes

During validation workshops, we also evaluate business processes and identify opportunities to improve efficiency, reporting, workflow automation, transparency, and operational effectiveness.

We document process improvement recommendations and review them with DHHS stakeholders. Recommendations may address workflow routing, approval processes, reporting, data handling, user responsibilities, communications, or operational controls. For each recommendation, we document the affected requirement, expected benefit, dependencies, implementation considerations, and DHHS disposition.

Approved recommendations inform future-state operations and design decisions. They are also incorporated, as applicable, into configuration activities, testing, training, and operating procedures. Recommendations affecting approved scope, schedule, cost, or contractual commitments follow the Change Management Plan.

## iv. Identify Key Features Prior to Configuration and Implementation

We work with DHHS stakeholders to identify and validate features, workflows, reporting capabilities, interfaces, security controls, and administrative functions that support the MDR Program.

Through demonstrations and review sessions, stakeholders evaluate how existing CMdS capabilities support business and operational requirements. These sessions establish a shared understanding of solution functionality before design and configuration activities begin.

We document which capabilities are available through standard functionality, which require Nebraska-specific configuration, and which depend on interfaces, converted data, reports, or approved process decisions. We also identify the user roles, data, and operational procedures associated with each major function.

## v. Develop, Review, and Approve the Requirements Validation Matrix

Throughout the validation process, we develop and maintain a Requirements Validation Matrix (RVM) that serves as the authoritative record of requirements validation activities and outcomes. The RVM documents the results of each requirement review and demonstration session. Key information captured includes:

- Requirement identifier and description
- Demonstration reference
- Solution capability that satisfies the requirement
- Validation and approval status
- Configuration considerations
- Follow-up actions and decisions
- Method by which the requirement will be fulfilled
- Process recommendation and DHHS disposition
- Development recommendation, when applicable

This record provides DHHS with visibility into how the solution addresses each requirement. The RVM also establishes a documented, approved baseline that supports downstream design, configuration, testing, implementation, and CMS certification activities.

The RVM documents how each approved requirement is satisfied through existing functionality, standard configuration, interface implementation, reporting configuration, data conversion, or operational procedures. It demonstrates Conduent's understanding of the requirements and confirms whether development beyond documented recommendations is needed. Any exception is identified for DHHS review and disposition.

Conduent reviews the RVM with DHHS throughout the validation process so that questions, discrepancies, and open decisions can be resolved quickly. DHHS reviews and approves the completed matrix, establishing the formal Requirements Validation baseline for the project.

## vi. Map Requirements to Project Work

Following validation, Conduent maps each approved requirement to the project work needed to deliver and verify it. We maintain a Requirements Traceability Matrix (RTM) in Azure DevOps that links requirements to applicable Project Work Plan activities, responsible roles, configuration decisions, design documentation, interface specifications, data-conversion activities, test scenarios, training materials, implementation deliverables, and acceptance evidence.

Requirements satisfied through existing CMdS functionality link to the applicable solution capability and validation evidence. Requirements requiring Nebraska-specific work link to the corresponding tasks, responsible resources, configurations, and planned verification activities.

This end-to-end traceability allows DHHS to track each requirement from validation through design, configuration, testing, implementation, and operational readiness. It also allows the Project Manager and workstream leads to identify requirements without assigned work, responsible resources, or planned verification before the affected activity advances.

## vii. Provide Requirements Status Reporting, Testing Evidence, and Change Management

Conduent maintains the RTM throughout the project lifecycle as the source of record for requirement status, supporting evidence, open items, and completion. We update each requirement as configuration decisions are made, testing is completed, issues are resolved, and DHHS approvals are received.

Requirements status reports and project dashboards show which requirements are complete, in progress, awaiting testing, affected by an issue, or pending a DHHS decision. We review this information through project status meetings, governance reviews, and executive reporting so that DHHS can identify unresolved items and potential effects on upcoming milestones.

The RTM links each requirement to its supporting testing evidence, which may include test cases, execution results, defect records, retest results, and acceptance documentation. These records demonstrate that the requirement was configured or implemented, tested, and completed. Risks, issues, decisions, and follow-up actions are also linked or referenced so that DHHS has a complete history of requirement fulfillment.

Any proposed change to an approved requirement follows the Change Management Plan. Before approval, Conduent evaluates the effect on scope, schedule, cost, configuration, interfaces, data conversion, testing, training, related requirements, and project objectives. Once approved, we update the RVM, RTM, Project Work Plan, and affected project documentation.

Figure VI.A.2.II.d.2-3 illustrates how Conduent uses Azure DevOps to trace each requirement through project work, design, configuration, testing, and completion.



**Figure VI.A.2.II.d.2-3. [redacted] Shows Requirement Traceability**
[redacted]

The Requirements Validation and Demonstration phase concludes when DHHS approves the RVM and the validated requirements are incorporated into the RTM as the project baseline. Because CMdS Rebate Administration satisfies most requirements through existing functionality and configurable capabilities, the next phase can focus on Nebraska-specific configuration, approximately 18 interfaces, data migration, security and reporting setup, workflow configuration, and testing preparation.

The approved RVM and maintained RTM give Conduent and DHHS a clear record of validation decisions and continued accountability for each MDR requirement through design, configuration, testing, implementation, and CMS certification.

### VI.A.2.II.d.3 Design and Configuration Narrative [RFP V.D.4]

**REQUIREMENT: RFP Section V.D.4**
Describe and include specific information regarding your approach and methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

***Conduent transforms approved requirements into a configured MDR solution that supports testing, implementation, and long-term operations.***

Following Requirements Validation and Demonstration, we begin the Design and Configuration phase. The CMdS Rebate Administration solution is a mature Medicaid rebate platform that satisfies most functional requirements through existing capabilities and configuration. The phase focuses on DHHS-specific business processes, configuration decisions, security controls, interfaces, and data conversion activities.

We apply a configuration-first methodology that reduces implementation risk and accelerates deployment by leveraging proven functionality rather than developing custom features. Design activities concentrate on the areas that provide the greatest value to the State, including interface integration, workflow configuration, security administration, data management, and reporting. Throughout the phase, we work closely with DHHS stakeholders to review functional design specifications, validate configuration decisions, and establish a solution baseline that supports testing, implementation, and long-term operations.

**The Conduent Advantage**

- Proven CMdS Rebate Administration functionality to meet your requirements
- Design activities focus on configuration, interfaces, security, workflows, and data conversion rather than extensive custom development
- Role-based security and configurable business rules support operational flexibility and long-term maintainability

## a. Establish and Utilize a Deliverable Review and Acceptance Process Agreed Upon by DHHS

Conduent uses the Deliverable Review and Approval Process established with DHHS during Project Initiation and Planning to manage Design and Configuration deliverables.

During this phase, Conduent develops and submits the documentation needed to translate approved requirements into a configured and test-ready solution. Deliverables include:

- Functional design and future-state workflow documentation
- Interface specifications and source-to-target data mappings
- Configuration workbooks, decision records, and baseline documentation
- Environment and deployment configuration documentation
- Data-conversion mappings, transformation rules, and validation criteria
- User-role, permission, and security configuration matrices
- Reporting, notification, correspondence, and business-rule specifications
- Configuration validation results and supporting acceptance records

These deliverables establish the approved design and configuration baseline used to build test cases, configure environments, prepare data, and confirm readiness for formal testing.

Review cycles scale to the size, complexity, and business impact of each deliverable. Activities include informal walkthroughs of draft and final deliverables, collaborative reviews, technical reviews, governance reviews, and formal DHHS approval. This allows DHHS and Conduent to discuss questions, identify concerns, and resolve comments before a deliverable becomes part of the approved solution baseline.

Deliverables reflect coordination with Nebraska's broader Medicaid modular environment, including dependencies involving other systems, vendors, interfaces, shared services, and project schedules.

Proposed changes follow the approved Change Management Plan. The appropriate DHHS and Conduent business, technical, project, and executive representatives participate based on the scope and effect of the proposed change. The impact assessment evaluates business value, implementation effort in hours, expected benefits, schedule impact, cost, technical dependencies, operational effects, and project priorities before the change is authorized.

Conduent and DHHS stagger deliverable due dates using mutually agreed review periods incorporated into the Project Work Plan. This approach gives reviewers adequate time while maintaining alignment with configuration, interface, data-conversion, and testing dependencies.

## b. Configure Environments for Development, Testing, Training, and Production

Conduent establishes separate Development, Testing, Training, and Production environments, each with a defined purpose, user group, data need, and access model. During planning, we review the environment approach with DHHS and identify the configuration, integration, security, and data activities needed to support each stage of implementation.

The Development environment supports configuration, development, unit testing, and technical troubleshooting. The Testing environments support formal system, integration, regression, performance, security, and user acceptance activities, as applicable. The Training environment provides a stable setting for users to practice approved workflows. Production contains the approved configuration used for live operations.

Non-production environments remain separate from Production and do not have access to live production data. Conduent works with DHHS to identify suitable synthetic, masked, converted, or other approved test and training data. We document applicable data sources, refresh needs, access controls, and protection requirements, so each environment supports its intended activities without exposing live operational information.

Configuration changes begin in Development and move through Testing and Training before Production deployment. Conduent uses automated deployment and configuration-management tools where appropriate to reduce manual effort and maintain consistency across environments. Version-controlled packages and configuration records provide traceability into what was deployed, where it was deployed, and which approved release it supports.

Before each environment is released for use, Conduent conducts an environment-readiness review with the applicable technical and project participants. The review confirms:

- Required components and approved versions are installed
- Access and security controls are active
- Interfaces and dependent services are available as applicable
- Required non-production data has been prepared and validated
- Logging, monitoring, backup, and recovery functions are configured
- Deployment and rollback procedures are documented
- Identified defects or limitations have an approved disposition
- The environment supports the activities scheduled in the Project Work Plan

We document any open issues and address those that would prevent the environment from supporting the planned activity. Throughout the contract, Conduent maintains environment configuration and deployment records and updates them as approved changes occur. Changes to established environments follow the Change Management Plan and applicable release procedures.

## c. Complete Standard System Configuration

Conduent completes Standard System Configuration by applying approved requirements and design decisions to the base CMdS Rebate Administration product. We implement the approved user-interface design and configure the business rules, workflows, security roles, reports, notifications, reference data, administrative controls, and integrations needed to support Nebraska's rebate operations.

The design and configuration effort addresses business processes, interfaces, security controls, reporting capabilities, user-interface requirements, and data-management needs. When an approved requirement is satisfied through existing product functionality, we provide documentation showing how CMdS supports it rather than creating unnecessary custom designs or development.

The Requirements Validation Matrix and Requirements Traceability Matrix connect each approved requirement to the applicable design decision, configuration activity, and verification evidence. This traceability helps the project team confirm that all required functionality is configured and prepared for testing.

A significant portion of this phase addresses the approximately 18 interfaces needed to exchange information across the Medicaid enterprise. We develop interface specifications and data mappings that define the content, format, frequency, security, validation, and error-handling requirements for each exchange.

We configure CMdS as an integrated platform supporting the complete rebate lifecycle. Project teams review how users interact with invoices, disputes, payments, reports, financial records, and operational workflows. Figure VI.A.2.II.d.3-1 illustrates how CMdS Rebate Administration supports the rebate lifecycle from data receipt and invoice generation through dispute resolution, payment reconciliation, and reporting.

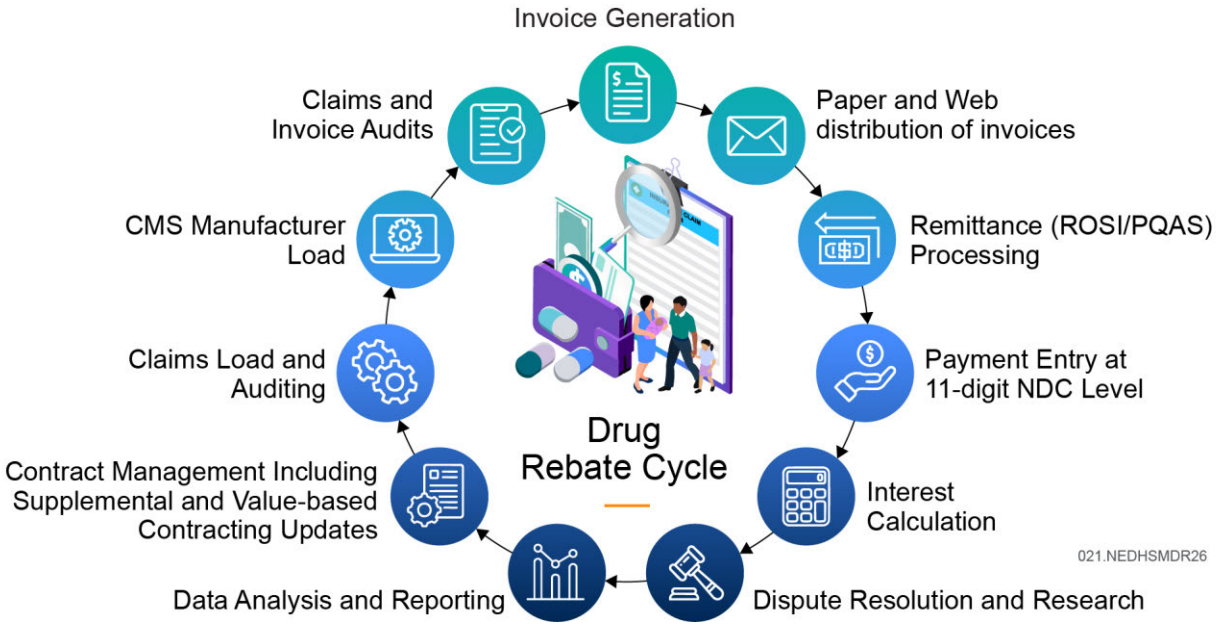



**Figure VI.A.2.II.d.3-1. Drug Rebate Lifecycle**
*We employ a continuous drug rebate cycle to maximize Rebate Program dollars.*

Workflow configuration aligns CMdS capabilities with DHHS operational practices. Configured workflows support invoice generation, dispute resolution, payment reconciliation, exception management, reporting, and administrative activities. Workflow controls, notifications, and routing rules reduce manual effort and provide visibility into pending work.

Data-management activities address migration, validation, reporting, and integration needs. We develop data mappings, conversion rules, file specifications, and validation criteria that support accurate migration into CMdS and preserve required historical information.

Configuration activities follow a hybrid Agile approach. We organize the work into sprints that progressively configure, review, test, and refine solution capabilities. Each iteration includes planning, configuration, unit testing, stakeholder review, and retrospective activities that support timely feedback and incremental progress.

Figure VI.A.2.II.d.3-2 shows how iterative configuration gives DHHS visibility into completed work and prepares approved functionality for formal testing.



**Figure VI.A.2.II.d.3-2.**

As configuration progresses, developers perform unit and configuration testing to confirm that business rules, workflows, integrations, reports, security settings, and user-interface functions operate as intended. We document results, correct identified issues, and retest affected functionality. Configuration reviews and validation sessions with DHHS confirm alignment with approved requirements and design decisions.

Configured components advance to formal system and integration testing only after they perform as intended. Approved configurations and supporting documentation become part of the controlled solution baseline.

## d. Assist the State with Configuration of the System

Conduent supports DHHS staff in completing the configuration activities assigned to the State. Before training begins, we identify those activities and provide the instructions, training, and hands-on support needed to complete them successfully.

Configuration support activities include:

- Identifying and documenting all configuration activities assigned to DHHS before configuration training
- Providing detailed configuration instructions
- Delivering training on the assigned configuration activities
- Assisting DHHS with configuration tasks when needed
- Providing support with software installation, network configuration, or related technical activities when applicable
- Supporting troubleshooting and issue resolution
- Conducting quality reviews of completed configuration activities

Following State-led configuration activities, we conduct a quality review to confirm completeness and accuracy. We communicate recommended corrections or adjustments within five business days of the review to support timely resolution.

Conduent tests the completed configuration to verify that it functions as intended and aligns with approved requirements and configuration decisions. Identified corrections are completed and retested before the affected functionality advances to formal testing.

## e. Assist DHHS with User Role Determination

We collaborate with DHHS to establish a role-based access-control framework that aligns system permissions with business responsibilities and security requirements. The project team assists DHHS in defining user roles, assessing user needs, and configuring permissions that support daily operations while protecting sensitive financial and operational data.

Each role receives a distinct set of permissions based on the functions, information, and responsibilities associated with that role. Conduent and DHHS evaluate user job duties and information needs and assign users to the appropriate roles.

We assign access rights according to the principle of least privilege. Users receive the permissions needed to perform assigned functions without receiving excessive access that could compromise sensitive data or system functionality. CMdS Rebate Administration supports configurable security roles that administrators can modify without code changes.

Role definitions, permission structures, assignment procedures, and administration processes are documented in a User Role and Access Guide delivered as part of implementation. The guide explains how authorized administrators configure, assign, modify, and manage roles and permissions.

Figure VI.A.2.II.d.3-3 illustrates how user responsibilities are aligned with configurable permissions and security controls.

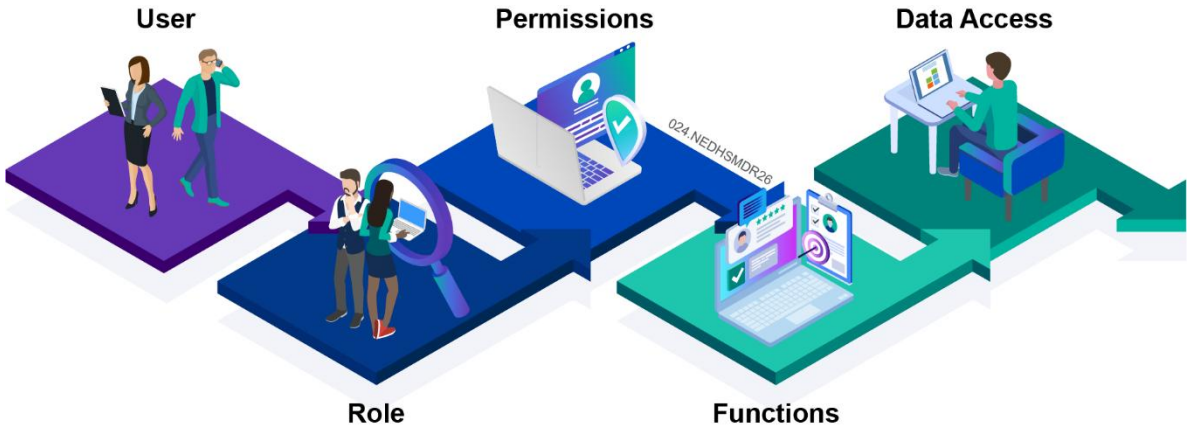



**Figure VI.A.2.II.d.3-3. Role-Based Security Model**
*Role-based security aligns user responsibilities with system permissions, supporting data protection, segregation of duties, and compliance with State security requirements.*

Conduent reviews configured roles and permissions with DHHS and validates that the associated functionality operates as intended. Security testing and access reviews confirm appropriate access before the solution progresses to subsequent project phases.

## f. Obtain Acceptance from the State on Design and System Configuration

We manage design and configuration acceptance through ongoing engagement and collaboration with DHHS. Design reviews, configuration demonstrations, security reviews, and governance meetings provide opportunities for DHHS stakeholders to evaluate progress, ask questions, and provide feedback throughout the phase.

Conduent provides DHHS with the applicable design, configuration, system, interface, data-conversion, security, and user-role documentation needed to evaluate the completed work.

The project team conducts quality reviews and readiness assessments to verify design completion, configuration accuracy, documentation readiness, security validation, testing results, and stakeholder alignment. We demonstrate the completed configuration and its alignment with approved requirements before requesting formal acceptance.

Conduent records DHHS questions and concerns, assigns responsible owners, and tracks each item through resolution. After required items are resolved or have a DHHS-approved disposition, Conduent obtains formal State sign-off on the design and configuration baseline and documents the approved next steps in the Project Work Plan.

Figure VI.A.2.II.d.3-4 summarizes the design and configuration milestones and acceptance activities completed before the project transitions into formal testing.

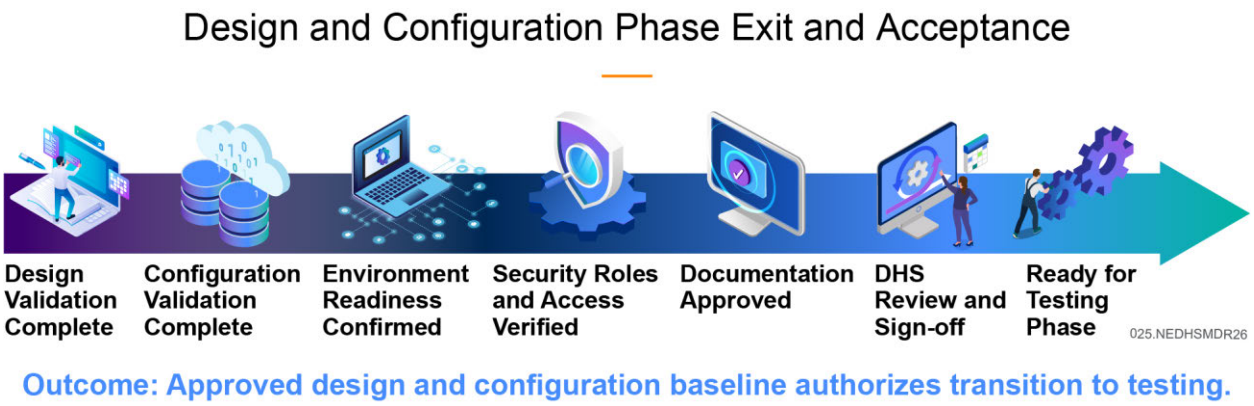



**Figure VI.A.2.II.d.3-4. Phase Exit and Acceptance Checklist**
*Successful completion of these activities establishes the approved baseline for testing and deployment readiness.*

The Design and Configuration phase produces the approved designs, configured environments, interface specifications, data-conversion documentation, configuration guides, user-role matrices, security documentation, and acceptance records needed for testing and implementation. The approved baseline gives Conduent and DHHS a common record of how requirements have been translated into a configured, secure, integrated, and test-ready MDR solution.

## VI.A.2.II.d.4 Development and Testing Narrative [RFP V.D.5]

**REQUIREMENT: RFP Section V.D.5**

Describe and include specific information regarding your approach and methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

As part of your response to items a. through h. incorporate the items below.

- Testing.
- Quality management.
- Collaboration and acceptance process.
- Release management and known issue documentation; and
- Any tool(s) used for testing and defect tracking.

a. Complete all Necessary Custom Development

Complete custom development on all requirements that require custom development. Upon completion and successful testing, DHHS will conduct a review of testing and upon successful outcomes, provide approval.

b. Complete all Necessary Reports

Complete all reports necessary and any required testing prior to go-live. Upon completion and successful testing, DHHS will conduct a review of testing and upon successful outcomes, provide approval.

c. Complete all Necessary Integrations (Interfaces, Imports, and Exports)

Complete all connections, data exchange mechanisms, and protocols to ensure efficient and reliable information flow. Convert all existing interfaces, imports and exports with changes as needed to integrate with the new system and test for performance. Upon completion and successful testing, DHHS will conduct a review of testing and upon successful outcomes, provide approval.

d. Develop a Testing Plan

Develop plan for testing the system's functionality, performance, compatibility, and integrations, including high-level tasks and timelines. Collect DHHS feedback on content and functionality and make all necessary changes as requested, on an agreed upon timeline. Testing plan must be maintained throughout the project lifecycle. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b) (vi)).

Develop, in collaboration with DHHS, a System Test Plan that describes the system testing approach and includes at a minimum each of the following:

i. Overall testing strategy for the following testing types: unit testing, system testing, integration testing, regressing testing, parallel testing, performance and load testing, manual and automated and/or scripted testing, disaster recovery and end-to-end integration testing of COTS products, if any.

ii. Test / Staging environment set-up.

iii. UAT plan.

iv. Approach for testing technical specifications.

v. Entrance criteria.

vi. Exit criteria.

vii. Configuration management.

viii. Testing documentation (e.g., test cases, test scripts, test case matrices added as design progresses).

ix. Process steps.

x. Inputs to system testing.

xi. Outputs to system testing.

xii. Reporting mechanisms, traceability and metrics.

xiii. Defects and defects resolution.

xiv. Pass/fail criteria.

xv. Suspension criteria and resumption requirements.

xvi. Testing documentation.

xvii. Testing activities.

xviii. Approach to quality control/quality assurance.

xix. Approach to bi-traceability to requirements and design.

xx. Resource roles and responsibilities.

xxi. Testing tools, techniques, and methods.

xxii. Acceptance criteria shall include, but not limited to; no high or critical defects in code released to production and all other defects will be reviewed and have an agreed upon remediation approach by the vendor and DHHS.

e. Execute and Evaluate Testing

Complete all required assigned testing. Conduct testing according to the Testing Plan and record results.

Testing must be as automated and self-documenting as possible (e.g., continuous unit testing). Analyze test results to identify issues, defects, and areas that require improvement. Collaborate with developers to fix issues and address performance issues. Collaborate with DHHS or designee to provide environments, data, and technical support for independent testing.

DHHS reserves the right to conduct independent testing of the system at any time. Testing plan must be maintained throughout the

project lifecycle. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2.(b)(vi)).

Testing should include the following:

i. Functionality

Verify system working as expected, according to the functional and technical requirements. Conduct regression testing for each upgrade released throughout the project prior to implementation. Conduct reliability testing to find system weaknesses to reduce the number of failures during deployment.

ii. Performance

Verify performance of each system module works as expected; testing system's bandwidth and performance, as expected in the work process. This will include load, stress, failure, and recovery tests.

iii. Compatibility

Verify browsers, devices, platforms, and operating systems are working as expected. Include printers, mobile devices, operating systems, and browsers. Coordinate with DHHS and specific system integration contacts to conduct integration testing. All inbound and outbound interfaces must be tested to ensure accurate and secure data transmission.

iv. Security

Conduct pre-go live penetration testing.

Conduct pre-go live security audits.

v. Accessibility

Provide DHHS or designee access to test cases, test results, and defect tracking via online tool(s). Ensure the test environment is available prior to UAT availability to facilitate interface testing with DHHS as provided in the Master Project Plan. DHHS reserves the right to inspect artifacts and results at any time.

f. Document Testing Results

Document testing results, summarize testing activities, and identify defects. A detailed testing results report must be developed.

g. Assist DHHS with User Acceptance Testing (UAT)

System must have a User Acceptance Testing (UAT) environment fully accessible to users at a time agreed upon with DHHS. Must assist DHHS with their User Acceptance Testing (UAT) efforts, from planning to execution to post-UAT support. Once the UAT is complete, all defects should be clearly captured and documented.

Responsibilities will include the following:

i. Assist DHHS with development of test scripts for the UA Testers, executing UAT plan, answer questions, and resolve any technical issues that arise.

ii. Collaborate with DHHS to capture and document identified defects, including clear descriptions, steps to reproduce, and severity levels.

iii. Work with the development team to prioritize and resolve defects identified during UAT, ensuring timely fixes and feedback to the testers.

iv. Provide DHHS with weekly defect resolution status.

v. Ensure the UAT environment is available before UAT scheduled start date.

h. Acceptance from DHHS on Testing Results

Must prepare and present a comprehensive testing report detailing the testing findings, addressing any concerns/questions by DHHS and response to concerns/questions. Critical and high defects must be corrected prior to go-live. All other defects will be reviewed and have an agreed upon remediation approach presented and approved by DHHS. UAT environment must be available at least ninety-nine percent (99%) of the time during business hours in the project testing phase. All defects must be resolved or have a well-documented mitigation plan in place to gain formal approval to proceed with the project's next phase. Final review and approval required by DHHS..

***Conduent combines decades of Medicaid experience, a proven implementation methodology, and a mature Quality Management System to deliver a low-risk, production-ready MDR Solution.***

During Development and Testing, Conduent completes the limited custom development, reports, interfaces, imports, and exports required to support Nebraska's implementation of the MDR Solution. New and modified functionality progresses through design, development, peer review, test preparation, execution, defect resolution, regression testing, user acceptance testing (UAT), and final DHHS approval.

**Why Conduent?**

- Proven Medicaid implementation and testing methodology
- Mature Quality Management System and defect controls
- Complete requirements-to-testing traceability through Azure DevOps

To manage these activities, Conduent uses Microsoft Azure DevOps as the central platform for requirements traceability, test management, defect tracking, release coordination, and reporting. Azure DevOps links requirements, design decisions, test cases, test results, defects, corrective actions, and releases, providing complete traceability throughout the implementation lifecycle. Conduent collaborates with DHHS and interface partners to prepare environments and test data, execute testing, resolve issues, document known limitations, and support production readiness and acceptance.

## a. Complete all Necessary Custom Development

Conduent completes the limited custom development required to support Nebraska's implementation of the MDR Solution. Because the MDR Solution is a mature Medicaid Drug Rebate platform, we anticipate that custom development will focus primarily on solution gaps, Nebraska-specific interfaces, reports, and enhancements identified during Requirements Validation and Design and Configuration.

Each approved development item is documented in Microsoft Azure DevOps and linked to the associated requirement(s). Conduent's development methodology follows our established SDLC process, beginning with requirements analysis, detailed design, and technical review. Conduent completes development in controlled environments, then reviews and unit tests each component before moving it to the next testing environment. We also place the component under configuration control, so changes remain traceable.

Conduent creates and maintains traceability between requirements, design documents, code changes, test cases, defects, and release packages. This allows DHHS to monitor development progress and confirm that completed functionality supports approved requirements.

Once development is complete, the functionality progresses through integration testing, system testing, regression testing, and UAT. Defects identified during testing are tracked within Azure DevOps, assigned for resolution, retested, and verified before the functionality is approved for deployment.

Release management activities govern migration of approved changes between environments and maintain version control throughout the implementation lifecycle.

Conduent provides DHHS with test results, defect status, and release information for review. We address DHHS questions and requested corrections before seeking approval to advance the completed functionality.

## b. Complete all Necessary Reports

Conduent configures, develops, tests, and validates the reports required to support MDR Solution operations, regulatory compliance, auditing, and program administration. These include reports supporting invoice and adjustment activity, labeler balances, disputes, payments, interest, quarterly reconciliation, CMS reporting, and Unit Rebate Amount information.

During Requirements Validation and Design and Configuration, Conduent develops a report inventory with DHHS. For each report, we document its purpose, intended users, source data, required fields, calculations, filters, frequency, format, delivery method, security requirements, and acceptance criteria. We also confirm scheduling, on-demand access, user-defined date ranges, and outputs.

Report development follows the same SDLC processes used for application functionality. Report definitions, layouts, business rules, calculations, and data requirements are documented during design, reviewed with DHHS, and developed.

Testing verifies that each report uses approved data sources and produces complete and accurate calculations, totals, fields, formatting, filters, and output. Testing may also verify role-based access, scheduled generation, distribution, and performance, as needed for the report. Reports complete the testing required by the approved Test Management Plan before go-live.

Report defects are recorded in Azure DevOps, corrected, and retested. We provide DHHS with the report specifications, representative outputs, testing evidence, and defect status needed to review and approve all reports before production.

## c. Complete all Necessary Integrations (Interfaces, Imports, and Exports)

Conduent develops, configures, tests, and validates all interfaces, imports, exports, APIs, web services, and file exchanges required to support Nebraska's MDR Solution. Integration activities focus on the secure and accurate exchange of rebate, claims, manufacturer, financial, reporting, and reference data needed to support drug rebate operations, invoicing, dispute management, reporting, and CMS compliance.

Conduent converts existing interfaces, imports, and exports and makes approved changes needed to integrate them with the new MDR Solution. For each exchange, we document the data, transmission method, frequency, format, security and validation requirements, error handling, and reconciliation approach. These specifications guide configuration, development, and testing.

Integration activities include:

- Interface design and interface control documentation
- Source-to-target data mapping
- Import and export validation
- Connectivity and transmission testing
- Security validation
- Error handling and recovery testing
- Performance and volume testing
- End-to-end testing
- Data reconciliation and audit verification

Testing confirms that data is transmitted accurately, completely, securely, and within required processing timeframes. Integration testing also validates interoperability among the MDR Solution, connected State systems, manufacturer communications, portal services, and external data sources.

Conduent tests interface performance under expected transaction and file volumes and evaluates response time, throughput, failure handling, recovery, and reconciliation. We coordinate testing schedules, environments, test data, connectivity, and issue resolution with DHHS and the system-integration contacts.

All interfaces undergo system integration testing, end-to-end testing, regression testing, and UAT before DHHS approval is requested and production deployment activities begin. Conduent provides DHHS with the interface specifications, executed test results, reconciliation evidence, defect status, and known-issue documentation needed to review and approve each completed integration.

## d. Develop a Testing Plan

Conduent develops the Test Management Plan with DHHS to guide testing throughout Nebraska's MDR implementation. The plan defines the testing scope, phases, environments, schedule, roles and responsibilities, tools, entry and exit criteria, defect-management process, reporting, and acceptance requirements for CMdS Rebate Administration.

Testing activities, dependencies, milestones, and timelines align with the Project Work Plan. Conduent reviews the plan and planned testing scope with DHHS, incorporates agreed feedback within mutually established timeframes, and maintains the plan throughout implementation. Changes follow the approved Change Management Plan.

Because CMdS Rebate Administration is a proven Medicaid Drug Rebate platform, testing places particular focus on Nebraska-specific configurations, reports, interfaces, imports, exports, data conversion, and approved custom development while also validating the integrated solution and its core functionality.

### *Testing Strategy*

The Test Management Plan defines how Conduent tests the configured MDR solution, including Nebraska-specific reports, interfaces, data exchanges, migrated rebate data, security roles, workflows, and custom development. It addresses:

- Unit testing of new or modified code, interfaces, reports, and configuration components
- System testing of Nebraska-specific workflows, business rules, notifications, security roles, and administrative functions
- Integration and end-to-end testing of interfaces, imports, exports, APIs, and file exchanges with participating systems
- Regression testing of existing CMdS functionality to confirm that Nebraska-specific changes do not affect proven product capabilities

- Parallel testing of key rebate processing, invoicing, reporting, and financial functions to compare MDR Solution results against existing processes and validate accuracy
- Performance, load, stress, failure, and recovery testing of processing activities
- Security testing, including pre-go-live penetration testing and security audits
- Accessibility and compatibility testing across supported browsers, devices, operating systems, printers, and user configurations
- Disaster recovery testing
- UAT led by DHHS with Conduent support

The plan aligns testing activities with Nebraska's core MDR functions, including rebate processing, invoicing, dispute resolution, reporting, manufacturer self-service, and invoice quality assurance.

### *Test Environments and Preparation*

The plan defines how Conduent uses the Development, System Integration Testing, UAT, and Production environments throughout the testing lifecycle. For each environment, the plan identifies its purpose, configuration, access requirements, test-data needs, interface dependencies, readiness checks, and availability expectations.

The plan also defines the inputs required to begin testing, including approved requirements, configuration decisions, interface specifications, file layouts, conversion mappings, security roles, reports, business rules, release content, and applicable technical specifications.

Test data represents realistic rebate scenarios such as federal and supplemental invoicing, manufacturer and labeler records, NDC eligibility, unit rebate amounts, invoice adjustments, disputes, payments, interest calculations, reconciliation, and reporting.

Before testing begins, Conduent confirms that the environment, release, test data, access, interfaces, tools, and supporting documentation meet the approved entrance criteria. Environment and release configurations remain under configuration control so the project team can identify the version and components associated with each test result.

### *Test Documentation, Traceability, and Evidence*

The Test Management Plan defines the test artifacts Conduent develops and maintains, including test scenarios, test cases, scripts, expected results, actual results, traceability records, defect logs, metrics, and test results reports.

Microsoft Azure DevOps serves as the primary tool for managing these artifacts. New and changed functionality is linked to applicable requirements, design decisions, releases, test cases, results, and defects. This supports bidirectional traceability from each requirement and design element to its test cases and results and from each test case or defect back to the applicable requirement, design decision, and release.

The plan also describes how DHHS and its designees access testing information, results, and defect status through the approved tools. DHHS may inspect test cases, results, defects, traceability records, and supporting evidence throughout the testing lifecycle.

### *Entry, Exit, Suspension, and Resumption Criteria*

The plan establishes measurable criteria for beginning and completing each testing phase. These entry and exit criteria confirm that testing begins only when prerequisite conditions are met and is complete only after the quality objectives have been achieved. Table VI.A.2.II.d.4-1 summarizes the criteria for each testing phase.

**Table VI.A.2.II.d.4-1. System Testing Entry and Exit Criteria**

| Entry Criteria Include | Exit Criteria Include |
|---|---|
| Approved Test Management Plan, test cases, scripts, and supporting test assets | Planned test cases executed and results documented |
| Test release deployed and prerequisite testing completed | Required requirements and design coverage achieved |
| Test environment validated and available | Agreed pass/fail criteria met |
| Required test data prepared and approved | Required regression testing completed |
| Required interfaces, dependent services, access, and tools available | Critical and high-severity defects corrected, retested, and verified |
| Required project and testing resources available | Remaining defects have a DHHS-approved remediation or mitigation plan |
| No unresolved defects or issues that prevent meaningful test execution | Required testing evidence and Test Results Reports completed and approved |

The plan also defines conditions that suspend testing, such as an unstable release, unavailable interface, environment outage, invalid test data, or blocking defect. Testing resumes after the issue is corrected, affected components are revalidated, and the Test Manager confirms readiness with DHHS.

Testing process steps include planning, preparation, readiness review, execution, defect triage, correction, retesting, regression testing, results analysis, reporting, and closure. Outputs include recorded results, testing evidence, requirements coverage, defect records, known-issue documentation, test metrics, readiness recommendations, and approved Test Results Reports.

### *Test Execution and Defect Management*

The plan defines the testing lifecycle from preparation through approval, including execution, defect triage, correction, retesting, regression testing, reporting, and closure. Pass or fail criteria are documented for each test case, and actual results and supporting evidence are recorded during execution.

Defects are logged in Azure DevOps with severity, affected requirement or function, reproduction steps, evidence, ownership, and target resolution. The plan establishes how Conduent and DHHS review and prioritize defects, assign corrective actions, retest completed fixes, and determine the required regression scope.

Critical and high defects are corrected before go-live. Other defects are reviewed with DHHS and have a documented, mutually approved remediation approach before the solution advances. Known issues, workarounds, owners, target dates, and release disposition are maintained as part of testing and release reporting.

The Test Management Plan defines how configuration and release controls are applied to software versions, configuration changes, test assets, test environments, defect corrections, and deployment packages. Approved releases are identified and promoted through environments using established release-management procedures.

### *UAT Planning and Support*

The Test Management Plan defines how Conduent prepares DHHS for UAT and supports the State from planning through completion. Working with DHHS, we establish the UAT schedule, participants, scenarios, test data, environment needs, defect process, weekly reporting, and acceptance criteria.

Before UAT begins, Conduent prepares and validates the UAT environment and provides the materials and tools testers need, including UAT training, user documentation, test cases and scripts, and access to Azure DevOps for test management and defect tracking. During execution, we answer tester questions, provide technical support, document and prioritize defects, coordinate fixes with the development team, support retesting, and report defect-resolution status to DHHS each week.

### *Quality Management, Reporting, and Acceptance*

The plan defines the quality controls applied to testing, including peer review of test cases and scripts, quality assurance review of coverage and traceability, execution quality checks, defect verification, and review of test reports before submission.

It also establishes the reporting cadence and content for test progress, requirements coverage, execution results, pass and fail status, defect trends, retesting, known issues, and readiness. Following completion of testing, Conduent prepares and presents the comprehensive testing report required by DHHS.

Before requesting approval to proceed, Conduent confirms that planned testing is complete, critical and high defects are resolved, remaining defects have DHHS-approved remediation plans, UAT is complete, and the MDR solution meets the agreed acceptance criteria for production deployment.

### *Resource Roles and Responsibilities*

The Test Management Plan identifies the Conduent, DHHS, and interface-partner roles involved in each testing phase. It defines responsibility for preparing environments and data, developing and reviewing test assets, executing tests, resolving defects, validating results, and approving progression.

The Test Manager coordinates testing activities, dependencies, and reporting across the project. Conduent's technical and business resources complete assigned testing and defect-resolution activities, while DHHS provides business validation, leads UAT, reviews testing outcomes, and approves applicable deliverables and results.

## e. Execute and Evaluate Testing

Conduent executes testing in accordance with the approved Test Management Plan and records results throughout each testing phase. We automate repeatable tests and capture results directly in the testing tools to reduce manual effort. Manual testing is used for activities that require business judgment, visual review, or user interaction.

During execution, testers compare actual results with expected results, record supporting evidence, and identify failed steps, unexpected behavior, performance concerns, and areas requiring improvement. Conduent analyzes results, works with developers and technical resources to correct identified issues, and completes retesting and applicable regression testing.

Defects are assigned for resolution, retested after corrective actions are completed, and tracked through closure. Conduent collaborates with DHHS and participating stakeholders to provide environments, test data, technical support, and documentation required for independent testing activities.

DHHS may conduct independent testing at any point during the project lifecycle. Conduent provides access to testing artifacts, test results, defect information, and supporting documentation through Azure DevOps and approved testing tools.

Testing includes:

### *Functionality*

Functional testing confirms that the MDR Solution performs in accordance with approved functional and technical requirements. Testing validates business workflows, rebate processing functions, reporting capabilities, security roles, administrative functions, interfaces, and configuration settings.

Regression testing is performed for each software release to verify that new enhancements, configurations, reports, interfaces, or defect corrections do not negatively affect existing functionality.

### *Performance*

Performance testing validates that the MDR Solution operates effectively under expected production workloads. Testing activities evaluate transaction throughput, processing performance, bandwidth utilization, response times, and overall system behavior.

Performance testing includes:

- Load testing to validate expected production volumes
- Stress testing to identify operational limits
- Recovery testing to validate system restoration processes
- Failure testing to evaluate system behavior during abnormal conditions
- Performance monitoring and analysis to identify bottlenecks and optimization opportunities

### *Compatibility*

Compatibility testing confirms that the MDR Solution functions properly across supported operating environments and user platforms. Testing validates supported browsers, operating systems, and devices used by DHHS personnel and authorized users.

Conduent coordinates compatibility and integration testing activities with DHHS and external interface partners to validate inbound and outbound data exchanges. Testing confirms that interfaces, imports, exports, APIs, and file transmissions operate accurately, securely, and consistently across the supported environment.

### *Security*

Security testing validates the effectiveness of access controls, authentication mechanisms, data protection measures, interface security, and other controls designed to protect sensitive information.

Security testing activities include:

- Vulnerability scanning to identify known security weaknesses
- Penetration testing to evaluate resistance to unauthorized access attempts and exploit scenarios
- Access control validation to confirm enforcement of role-based security
- Security configuration reviews to evaluate compliance with security requirements
- Interface security testing to validate secure transmission of data

Pre-go-live penetration testing is performed to identify and remediate security risks before deployment. Pre-go-live security audits evaluate security controls, configurations, policies, user access management, logging, monitoring, and related security practices. Results are reviewed, documented, and addressed through established remediation processes before production implementation.

### *Accessibility*

Accessibility testing evaluates the MDR Solution's compliance with approved accessibility requirements and usability standards. Testing includes review of user interface components, navigation, workflows, forms, and supported accessibility features.

DHHS and its designees receive access to test cases, test results, defect tracking information, and supporting documentation through approved online tools. Test environments are available prior to UAT activities to support interface testing, validation efforts, and review of testing artifacts. DHHS may inspect testing artifacts, results, and supporting evidence throughout the testing lifecycle.

## f. Document Testing Results

Conduent documents results throughout each testing phase and prepares Test Results Reports at milestones agreed upon with DHHS. After all planned testing is complete, we compile the final comprehensive Testing Results Report and submit it to DHHS for review and approval.

The report provides full visibility into completed testing activities and summarizes the functionality, interfaces, reports, workflows, configurations, and requirements validated during the testing cycle. Results include executed test cases, pass/fail outcomes, requirements coverage, and details of any defects identified during testing.

Defect reporting includes severity classification, root cause analysis, corrective actions, resolution status, and retesting results to confirm successful remediation. This provides DHHS with a clear understanding of solution readiness, outstanding issues, and any risks that may affect implementation activities.

Test results are traced to the Requirements Traceability Matrix (RTM) maintained within Microsoft Azure DevOps to confirm that approved functional, technical, interface, reporting, and data requirements have been validated through testing. This demonstrates that the MDR Solution satisfies approved business and technical requirements and supports complete accountability from requirements through testing and deployment.

The Test Results Report also includes testing metrics and performance indicators that provide visibility into overall testing progress and quality, including:

- Test execution status and completion rates
- Requirements coverage metrics
- Pass/fail statistics
- Defect trends and severity analysis
- Defect resolution and retesting results
- Outstanding issues and mitigation activities
- Readiness assessments and recommendations

The final report also identifies known issues, approved workarounds, planned remediation dates, and release disposition. Conduent reviews the report with DHHS, responds to questions and concerns, and incorporates agreed corrections before requesting approval.

## g. Assist DHHS with User Acceptance Testing

Conduent works closely with DHHS throughout UAT to validate that the MDR Solution supports Nebraska's operational, business, reporting, interface, and workflow requirements before production deployment.

Before UAT begins, Conduent prepares and validates a dedicated UAT environment that includes approved configurations, reports, interfaces, security roles, workflows, and test data. The environment is made available before the agreed UAT start date to support tester readiness and interface-validation.

Conduent maintains the UAT environment and supports tester access, defect management, issue resolution, and retesting activities. The UAT environment is available at least 99% of the time during business hours, as required by the RFP. Availability is monitored and reported through the project's established status and testing-reporting processes.

Conduent supports DHHS during UAT by providing UAT orientation, test cases, test scripts, system demonstrations, user documentation, and access to testing and defect-tracking tools. This prepares UAT participants to execute the approved plan, document results, and report identified defects.

Throughout UAT, Conduent collaborates with DHHS to:

- Develop and refine test cases and scripts for UAT testers
- Answer tester questions and resolve technical issues
- Provide user guides, training materials, and workflow demonstrations
- Capture defects with clear descriptions, reproduction steps, evidence, and severity levels
- Prioritize defects with DHHS and the development team
- Investigate root causes and complete corrective actions
- Support retesting following defect resolution
- Provide weekly defect-resolution status to DHHS
- Maintain and support the UAT environment throughout execution

At the conclusion of UAT, Conduent reviews testing outcomes with DHHS and confirms that all identified defects are clearly captured and documented. We record completed resolutions, remaining remediation or mitigation plans, retesting results, known issues, and the information needed to support production-readiness and acceptance decisions.

## h. Acceptance from DHHS on Testing Results

Following completion of testing activities, Conduent prepares and presents a comprehensive Testing Results Report for DHHS review. The report summarizes testing scope, executed test cases, requirements coverage, test outcomes, defect metrics, resolution activities, retesting results, known issues, mitigation plans, and overall production readiness.

Testing results, defect status, remediation activities, and readiness assessments are reviewed collaboratively to confirm that the MDR Solution and supporting business processes are prepared for production deployment. Conduent documents DHHS questions and concerns, provides responses, and tracks required follow-up actions through resolution or an approved disposition.

Critical and high-severity defects are corrected, retested, and verified before go-live. Remaining defects are reviewed jointly with DHHS and documented with an agreed-upon remediation approach, target resolution plan, and associated risk assessment.

Before requesting approval to proceed to the next project phase, Conduent verifies that:

- Planned testing activities have been completed
- Testing results have been documented and reviewed
- Critical and high-severity defects have been resolved
- All other defects have been resolved or have a well-documented, DHHS-approved remediation or mitigation plan
- Known issues and workarounds have been documented
- UAT activities have been completed
- Production readiness has been assessed
- DHHS questions and concerns have been addressed
- Required testing and acceptance documentation is complete

Conduent presents the final testing results and readiness recommendation to DHHS and obtains formal DHHS review and approval before the MDR Solution advances to the next project phase.

### VI.A.2.II.d.5 Data/File Conversion and Migration Narrative [RFP V.D.6]

**REQUIREMENT: RFP Section V.D.6**

Describe and include specific information regarding your approach and methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly. The deliverables in a. through e. below require final review and approval by DHHS. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b)(vi)).

6. Data/File Conversion and Migration

Describe and include specific information regarding your approach and methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly. The deliverables in a. through e. below require final review and approval by DHHS. Any changes during the duration of the project must follow the approved Change Management Plan (Section V.D.2. (b)(vi)).

a. Develop a Data/File Conversion and Migration Plan

Provide details, images, and document file types for the data/file conversion and migration. The comprehensive data/file conversion and migration plan must be maintained throughout the project lifecycle. The key aspects of the plan should include the following:

i. Data Management Strategy – must support integration, optimization, quality, stewardship, standards, and governance of data.

ii. Data/File Conversion Process – must describe the data/file conversion process and explain the process of transforming data and files from one format or architecture to another.

iii. Data/File Migration Process – must describe the data/file migration process and explain the process of moving data and files from the current system to the new system.

iv. Roles and Responsibilities – must define the roles and responsibilities for those responsible for data/file conversion and migration tasks.

v. Tasks and Timeline – must identify specific tasks needed to be completed for the conversion and migration, assign due dates and task owners.

vi. Contingency – must describe the approach to any foreseeable obstacles regarding data migration during the transition period. Include information about contingency procedures in the event of an unsuccessful cutover.

b. Develop a Conversion Mapping Guide

Develop a guide for the data/file conversion to transform data and files from one format or architecture to another, ensuring compatibility with the target system. Provide data layout documentation to DHHS. The detailed conversion and mapping guide must be maintained throughout the project lifecycle.

The key aspects of the plan should include the following:

i. Data Inventory - List all data sources, file types, and formats involved in the conversion. Describe data structures, field definitions, and relationships. Identify any unique or complex data elements requiring special handling.

ii. Data Mapping - Create detailed maps showing how data elements from the old system correspond to fields in the new system. Address differences in data structures, field names, data types, and coding schemes. Explain any data transformations or calculations required during conversion.

iii. Conversion Logic - Outline the steps involved in the conversion process, including data extraction from source systems, data cleaning and validation, data transformation and mapping, and loading data into the new system. Specify any tools, scripts, or software used for conversion.

iv. Testing and Validation - Describe testing procedures to ensure data accuracy and completeness after conversion. Define acceptance criteria for successful conversion. Outline processes for error handling and data reconciliation.

v. Documentation - Provide instructions for conversion team members. Include screenshots, examples, and decision trees for complex mappings. Document any assumptions, limitations, or known issues.

c. Perform the Data/File Conversion and Migration

Transform data and files from one format or architecture to another following the mapping guide so that it is compatible with the target system. Move all historical data and files to the new database(s).

d. Provide a Data/File Conversion and Migration Results Report

Describe present key conversion metrics to DHHS and stakeholders using tables, charts, and graphs to visually represent the results and highlight any potential concerns regarding the conversion process.

The key aspects of the report should include the following:

i. Number of records successfully converted.

ii. Number of records with errors or inconsistencies.

iii. Details of any data discrepancies encountered and how they were handled.

iv. Performance statistics of the conversion process (e.g., processing time, resource usage).

v. Additional details or supporting documentation, such as detailed data mapping tables, sample error logs, results, and system configuration logs.

e. Acceptance from the State on Data/File Conversion and Migration Results

Present the final data migration results, address any concerns or questions raised by DHHS, and gain their formal approval to proceed with the project's next phase.

***Conduent's methodology for data conversion and migration is designed and executed by Medicaid experts that fully understand Nebraska's objectives and challenges in the drug rebate environment.***

## Approach and Methodology for Data/file Conversion and Migration Tasks

Conduent uses a controlled, repeatable process to convert and migrate Nebraska's historical Medicaid Drug Rebate data and files into the CMdS Rebate Administration solution. We begin by inventorying and profiling the source data, confirming the conversion scope, and documenting source-to-target mappings and transformation rules. We then develop and test the conversion routines, execute planned trial conversions, reconcile results with the source data, correct identified exceptions, and complete the approved production migration. This approach connects planning, mapping, execution, validation, reporting, and DHHS acceptance so that converted data is accurate, complete, and usable in the new solution.

### Conduent Data Conversion Benefits

- Established Medicaid conversion methodology
- Trial conversions before production
- Automated validation and reconciliation
- Complete auditability and traceability
- Structured governance and change management
- Formal Nebraska DHHS review and approval at each major milestone
- Low-risk transition to production operations

Conduent submits each required deliverable for DHHS review and approval and maintains the Data/File Conversion and Migration Plan and Conversion Mapping Guide throughout implementation. Conversion activities, findings, decisions, and changes are clearly documented and aligned with the Project Work Plan. Changes follow the approved Change Management Plan. When additional activities are needed to complete the conversion or achieve full functionality, we incorporate them into the approved approach and Project Work Plan.

### *a. Develop a Data/File Conversion and Migration Plan*

Conduent develops the Data/File Conversion and Migration Plan early in implementation and maintains it throughout the project. The plan defines the conversion scope, source systems and files, data-management approach, conversion and migration processes, roles, schedule, validation activities, contingency procedures, and acceptance criteria.

The plan identifies the data, document, and image-based file types included in the conversion. Depending on the sources provided by DHHS, these may include database extracts, CSV, TXT, XML, XLSX, PDF, and other approved formats. For each source, the plan describes how the data or file will be received, protected, analyzed, transformed, validated, loaded, and reconciled.

Figure VI.A.2.II.d.5-1 illustrates how conversion activities move from source analysis and mapping through trial conversion, validation, production migration, and final acceptance.



**Figure VI.A.2.II.d.5-1.**

### *Data Management Strategy*

Conduent develops the data-management strategy with DHHS to support data integration, quality, stewardship, standards, governance, and long-term use in CMdS Rebate Administration. During conversion planning, we identify the source systems, responsible data owners, target data requirements, applicable standards, and data-quality expectations.

The strategy defines how the project team will:

- Inventory and classify source data and files
- Assign ownership and stewardship responsibilities
- Profile data to identify quality issues, gaps, duplicates, and inconsistent values
- Apply approved data definitions, formats, coding standards, and validation rules
- Protect sensitive information during extraction, transfer, staging, testing, and loading
- Maintain data lineage from the source through the target system
- Track data-quality issues, decisions, corrections, and final disposition
- Measure and report conversion quality and reconciliation results

These controls provide a common approach for managing data across conversion activities and help DHHS verify how historical information is represented in the new solution.

### *Data/File Conversion Process*

The conversion process transforms source data and files into the formats and structures required by CMdS Rebate Administration. Conduent begins by analyzing the source data, documenting its business meaning, and developing approved source-to-target mappings and transformation rules.

Each conversion cycle generally includes:

- Receiving and verifying approved source extracts and files
- Profiling the data and identifying exceptions
- Applying cleansing and standardization rules
- Transforming fields, values, codes, and file structures
- Validating the converted output against the mapping specifications
- Loading the converted data into the applicable environment
- Reconciling results with the source data
- Documenting and correcting exceptions
- Retesting corrected data before the cycle is closed

Conduent uses controlled Extract, Transform, and Load (ETL) processes, conversion scripts, and validation routines to support repeatable execution. Conversion records link the source data, mapping rule, transformation, result, and applicable exception so the project team can trace how data was handled.

### *Data/File Migration Process*

The migration process moves approved and validated data and files from Nebraska's current environment into CMdS Rebate Administration. Conduent loads source extracts into a controlled staging area, applies the approved conversion rules, and validates the results before data advances to the target environment.

Planned trial conversions allow Conduent and DHHS to evaluate data quality, mappings, processing time, reconciliation results, and the effect of converted data on MDR business functions. They also provide approved converted data for testing workflows, interfaces, reports, and other solution functionality. Findings from each cycle are documented and used to refine conversion scripts, mappings, validation routines, and cutover activities.

Before the final production migration, Conduent presents the applicable trial-conversion results, open issues, reconciliation status, and cutover-readiness information to DHHS. Final migration proceeds after the required readiness criteria have been met and DHHS approves the production conversion activities.

During final migration, Conduent controls extraction, transfer, loading, verification, and reconciliation according to the approved schedule and cutover procedures.

### *Roles and Responsibilities*

The Data/File Conversion and Migration Plan identifies the Conduent, DHHS, and supporting project resources responsible for each conversion activity. Responsibilities are assigned by task and reflected in the Project Work Plan.

**Table VI.A.2.II.d.5-1. Data Conversion and Migration Roles and Responsibilities**

| Role | Primary Responsibilities |
|---|---|
| Conduent Data Conversion Lead and Team | Plan and coordinate conversion activities; develop mappings and conversion routines; execute trial and production conversions; reconcile results; and maintain conversion documentation |
| Conduent Business Analysts and Medicaid SMEs | Confirm the business meaning of source data, support mapping decisions, define validation rules, and evaluate converted MDR transactions and records |
| Conduent Testing and Quality Resources | Review conversion assets, execute validation procedures, verify corrections, and confirm that required evidence is complete |
| DHHS Data Owners and SMEs | Provide source information and files, explain legacy business rules, review mappings, validate converted information, and approve required deliverables and results |
| Project and Technical Leads | Coordinate schedules, environments, access, dependencies, issues, cutover activities, and status reporting |

Conduent and DHHS review responsibilities during planning and update them when approved changes affect the conversion scope or schedule.

### *Tasks and Timeline*

The Data/File Conversion and Migration Plan includes the tasks, dependencies, milestones, and due dates needed to complete the conversion. These activities align with the Project Work Plan and the schedules for design, interfaces, testing, operational readiness, and implementation.

Planned activities include:

- Source-system and file inventory
- Data profiling and quality assessment
- Data-layout and mapping development
- Conversion-rule and script development
- Data cleansing and exception resolution
- Trial conversion preparation and execution
- Reconciliation and business validation
- Correction and retesting
- Cutover preparation and readiness review
- Final production migration
- Conversion Results Report preparation
- DHHS review and formal acceptance

Conduent reports conversion progress, upcoming activities, dependencies, open decisions, and issues through the established project-reporting process. Changes affecting approved tasks, dates, ownership, or scope follow the Change Management Plan.

### *Contingency*

The plan identifies conversion and migration risks and the actions used to manage them. Potential obstacles may include incomplete source files, data-quality issues, undocumented values, mapping gaps, delayed extracts, interface dependencies, and processing-performance concerns.

Conduent addresses these conditions through early data profiling, validation rules, exception reporting, trial conversions, schedule monitoring, and timely escalation to DHHS. The plan identifies the decision points, responsible participants, and corrective actions used when an issue could affect the conversion schedule or results.

The contingency procedures also address an unsuccessful production cutover. Depending on the issue and the approved cutover approach, Conduent may pause processing, preserve the source and conversion evidence, return to the approved pre-cutover operating state, correct the affected mappings or routines, reload data, or reschedule the migration. Conduent documents the issue and its effect, completes the required correction and validation, and obtains DHHS approval before another production migration attempt begins.

## *b. Develop a Conversion Mapping Guide*

Conduent develops and maintains the Conversion Mapping Guide as the detailed reference for transforming Nebraska's source data and files into formats compatible with CMdS Rebate Administration. The guide provides DHHS with source and target data layouts and connects each source element to its target location, transformation rule, validation requirement, and final disposition.

The guide remains under configuration control and is updated as source information, design decisions, data-quality findings, or approved requirements change.

### *Data Inventory*

Conduent creates an inventory of the source systems, databases, extracts, file types, formats, documents, and supporting files included in the conversion. For each source, the inventory documents the owner, purpose, structure, field definitions, relationships, volume, frequency, dependencies, and known data-quality considerations.

The inventory addresses historical MDR information such as manufacturer and labeler records, invoice history, claims and utilization information, disputes, payments, accounts receivable, reference data, and supporting documents provided by DHHS. Data profiling identifies elements requiring special handling, including complex relationships, inconsistent codes, missing values, duplicate records, and legacy fields that do not directly align with the target model.

### *Data Mapping*

Conduent develops source-to-target mappings showing how each legacy data element corresponds to the CMdS Rebate Administration solution. The mappings identify source and target fields, data types, lengths, allowable values, code translations, defaults, calculated fields, validation rules, and related business logic.

When the source and target structures differ, the guide documents the transformation or calculation required to preserve the data's business meaning. It also identifies crosswalks, sequencing rules, dependencies, and conditions that affect how a record is converted. DHHS reviews the mappings and related decisions before the corresponding conversion routines are finalized.

### *Conversion Logic*

The Conversion Mapping Guide documents the logic used to extract, cleanse, transform, validate, and load each source. It identifies the applicable conversion steps, scripts or tools, processing sequence, dependencies, calculated values, exception conditions, and controls used to verify the results.

Conduent maintains conversion logic and scripts under version control, so the team can identify which approved mappings and rules were used during each conversion cycle. Updates resulting from data-quality findings or validation results are documented, reviewed, and retested before use in a subsequent cycle.

### *Testing and Validation*

The guide defines how Conduent tests converted data for accuracy, completeness, integrity, and usability. Validation procedures may include comparisons of source and target record counts, financial totals, control totals, required fields, code values, data relationships, invoice and payment balances, and representative MDR transactions.

Conduent and DHHS establish the applicable acceptance criteria before the conversion is finalized. Exceptions are recorded with the affected source, mapping or rule, business effect, correction, retesting result, and final disposition. Reconciliation confirms that converted results agree with the approved source information or that any accepted difference is documented and approved.

### *Documentation*

The Conversion Mapping Guide provides the instructions and supporting information needed by conversion team members to perform and verify the work consistently. Documentation includes source and target layouts, mapping tables, transformation rules, conversion procedures, examples, screenshots, and decision trees where they clarify complex mappings.

The guide also records assumptions, limitations, known issues, mapping decisions, validation requirements, and exception-handling instructions. This information supports conversion execution, troubleshooting, knowledge transfer, audit review, and future maintenance.

## *c. Perform the Data/File Conversion and Migration*

After DHHS approves the Data/File Conversion and Migration Plan and Conversion Mapping Guide, Conduent executes the conversion and migration activities according to the approved schedule and procedures.

For each planned cycle, Conduent receives the approved source data and files, verifies the contents, and loads them into a controlled staging environment. We profile and validate the source information, apply the approved cleansing and transformation rules, and load the converted results into CMdS Rebate Administration. Conversion scripts and validation routines generate processing logs and exception information that support reconciliation and troubleshooting.

Conduent performs the trial conversions identified in the approved plan. After each cycle, we compare source and target record counts, balances, control totals, data relationships, and representative rebate transactions. Discrepancies are documented, investigated, corrected, and retested before the affected data advances.

During final migration, Conduent moves all historical data and files provided by DHHS and identified in the approved conversion inventory into the applicable production databases and repositories. This may include manufacturer and labeler records, invoice and adjustment history, disputes, payments, accounts receivable information, reference data, claims-related information, and supporting files.

Conduent monitors the final migration, validates the loaded information, reconciles results with the approved sources, and reports status to DHHS. The migration is considered complete after the required validation and reconciliation activities are finished and the results are documented for DHHS review.

## *d. Provide a Data/File Conversion and Migration Results Report*

Conduent prepares the Data/File Conversion and Migration Results Report to present the outcome of the conversion to DHHS and project stakeholders. The report uses tables, charts, and graphs to show conversion results, reconciliation status, performance, exceptions, and any items requiring attention.

The report summarizes the completed conversion cycles, source data processed, validation performed, acceptance criteria applied, discrepancies identified, corrective actions completed, and the readiness of the converted data for continued implementation activities.

### *Number of Records Successfully Converted*

The report identifies the number of records received, processed, converted, validated, and loaded successfully. Results are presented by source, file type, business area, or other categories agreed upon with DHHS. Record counts and applicable control totals are reconciled with the approved source information.

### *Number of Records with Errors or Inconsistencies*

The report identifies records that encountered validation errors, transformation exceptions, missing or invalid values, duplicate information, relationship issues, or other inconsistencies. Exceptions are categorized by source, type, severity, business effect, and status.

### *Data Discrepancies and Resolution*

For each material discrepancy, the report describes the issue, affected data, cause when determined, corrective action, retesting result, and final disposition. The report distinguishes between corrected records, accepted differences, and any remaining items requiring an approved remediation or monitoring approach.

### *Conversion Performance Statistics*

The report presents applicable conversion-performance measures, such as processing duration, throughput, batch completion, resource utilization, interface or file-processing results, and execution status. Conduent compares actual results with the estimates established in the approved plan and identifies any changes needed for future conversion activity.

### *Supporting Documentation*

Supporting documentation may include source-to-target mapping summaries, detailed reconciliation results, validation evidence, exception logs, processing logs, configuration and script versions, test results, and other records needed to explain the conversion outcome.

Table VI.A.2.II.d.5-2 summarizes the types of measures included in the Conversion Results Report. Actual values are populated from Nebraska's conversion results.

**Table VI.A.2.II.d.5-2. Conversion Results Measures**

| Metric | Reported Information |
|---|---|
| Records received and processed | Counts by source, file type, or business area |
| Records converted successfully | Successful loads and percentage of total records processed |
| Records with exceptions | Number, type, severity, and resolution status |

| Metric | Reported Information |
|---|---|
| Reconciliation results | Source-to-target counts, control totals, and identified differences |
| Financial balancing | Applicable invoice, payment, receivable, and other financial totals |
| Conversion performance | Processing duration, throughput, resource use, and batch status |
| Outstanding items | Remaining issues, owners, planned actions, and DHHS-approved disposition |

Conduent reviews the report and supporting evidence with DHHS before requesting final acceptance.

### *e. Acceptance from the State on Data/File Conversion and Migration Results*

Conduent presents the final conversion and migration results to DHHS for review and approval. The review covers the conversion scope, record counts, reconciliation results, financial balancing, validation evidence, performance statistics, resolved discrepancies, and any remaining items requiring an approved disposition.

During the review, Conduent answers DHHS questions, records concerns and requested follow-up actions, assigns owners, and tracks each item through resolution or a DHHS-approved disposition. Conduent updates the Results Report and supporting documentation to reflect agreed corrections or decisions.

After the acceptance criteria have been met, Conduent requests formal DHHS approval of the Data/File Conversion and Migration Results Report and the completed conversion activities. DHHS approval authorizes the project to proceed to the next phase. Any later changes or newly identified needs are evaluated through the approved Change Management Plan.

## VI.A.2.II.d.6 Training Narrative [RFP V.D.7]

**REQUIREMENT: RFP Section V.D.7**
Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

***Conduent combines proven Medicaid rebate expertise, practical training methods, and operational knowledge transfer to help DHHS rapidly build workforce proficiency and readiness. In alignment with our state partners, our mission is to serve as a true steward of the public trust. Through documentation and accurate training, we ensure we consistently meet your goals.***

Conduent prepares DHHS personnel to effectively use, support, administer, and maintain the Medicaid Drug Rebate (MDR) solution. Our structured training methodology combines Medicaid rebate expertise, role-based instruction, hands-on learning, and continuous knowledge transfer to build workforce proficiency and support successful program operations.

With more than 27 years of Medicaid rebate administration experience, Conduent integrates training activities throughout implementation. This approach helps DHHS develop user competency, strengthen operational readiness, and support long-term program sustainability.

## Training Methodology

Conduent follows a structured training methodology that aligns learning activities with project milestones, business objectives, and workforce readiness goals. We assess training needs, develop role-based curricula, create training materials, deliver instruction, validate knowledge, measure readiness, and support users after go-live.

Our blended learning approach combines instructor-led training, virtual instructor-led training (vILT), self-paced learning, workshops, demonstrations, online tutorials, and hands-on exercises. This flexible model accommodates diverse learning preferences while helping users apply knowledge through realistic MDR business scenarios.

### Why DHHS Benefits from Conduent's Training Approach

- Role-based learning aligned to DHHS responsibilities
- Real-world MDR scenarios and hands-on exercises
- Continuous knowledge transfer that promotes operational self-sufficiency
- Learning paths aligned to implementation milestones
- Ongoing access to training resources, job aids, and LMS content

We integrate training with solution design, configuration, testing, deployment, and transition activities. Users gain practical experience as the system evolves, allowing DHHS to evaluate readiness before production deployment.

Knowledge transfer activities occur throughout implementation. Conduent subject matter experts work directly with DHHS personnel to transfer business, technical, operational, and administrative knowledge that supports long-term self-sufficiency.

## Training Needs Assessment and Planning

Conduent collaborates with DHHS to develop a comprehensive Training Plan that aligns learning activities with business processes, operational responsibilities, and project objectives.

We conduct a training needs assessment to identify stakeholder groups, user roles, system interactions, and learning requirements. Training audiences may include rebate analysts, supervisors, program managers, reporting users, system administrators, technical support personnel, executive leadership, and authorized external users.

Based on assessment results, Conduent establishes audience-specific learning objectives and training paths. These learning paths align with business workflows, reporting functions, system administration activities, operational responsibilities, and support requirements.

Training schedules align with the Master Project Plan and key project milestones, including User Acceptance Testing (UAT), Operational Readiness Review (ORR), and deployment activities. Conduent schedules end-user training sufficiently in advance of go-live to allow participants to practice system functions and build proficiency.

We conduct readiness assessments throughout training delivery to evaluate participant progress, identify learning gaps, and determine whether additional instruction is needed before transition to production operations.

Conduent's knowledge transfer approach helps end users fully use MDR functionality by connecting system capabilities to daily business processes, reporting activities, rebate workflows, and program management responsibilities. Users learn not only how to navigate the system, but also how to apply system functionality to improve productivity, data accuracy, and operational effectiveness.

## Curriculum Development and Training Materials

Conduent develops role-based curricula tailored to each audience's responsibilities, workflows, and system interactions. Training content reflects actual Nebraska MDR business processes and operational activities.

Curricula address:

- System navigation and general use
- Invoice processing and rebate management
- Reporting and analytics
- Ad hoc report generation
- Record management and modification
- Database administration and maintenance
- System and security administration
- Configuration management
- Vendor support processes
- Third-party functionality supporting MDR operations
- System upgrades and enhancements

Training materials include user manuals, administrator guides, participant workbooks, job aids, quick-reference materials, online tutorials, exercises, and demonstrations.

Documentation uses concise, user-friendly language and supports both novice and experienced users. Materials include step-by-step procedures, workflow guidance, screenshots, glossary terms, report instructions, error resolution guidance, and reference information.

Conduent provides all training materials, presentations, exercises, manuals, and supporting documentation at least ten business days before scheduled training for DHHS review and approval.

Conduent develops and maintains a comprehensive data dictionary. The dictionary includes database names and descriptions, table definitions, field names, data types, field lengths, formats, valid values, and associated business rules.

User and administrator manuals include tables of contents, indexes, acronym definitions, report descriptions, error message guidance, and detailed corrective actions to support efficient system use.

## Training Delivery Approach

Conduent delivers training through multiple learning modalities designed to maximize participation, engagement, and knowledge retention.

**Instructor-Led Training.** Experienced subject matter experts conduct classroom-based training sessions that combine demonstrations, guided instruction, discussion, and practical exercises. All key project staff remain available throughout training activities to answer questions and provide operational insights.

**Virtual Instructor-Led Training.** Virtual instructor-led sessions delivered through Microsoft Teams provide live instruction, collaboration, demonstrations, and facilitated discussions for remote participants.

**Workshops and Demonstrations.** Interactive workshops guide participants through real-world Nebraska MDR scenarios. Demonstrations illustrate system functionality, business processes, reporting capabilities, administrative functions, and support procedures.

**Hands-On Exercises.** Participants perform common business transactions within a controlled training environment. Exercises mirror production activities and reinforce practical application of system functionality.

Training includes:

- Overview and navigation of the MDR solution
- End-to-end role-based business processes
- Administrative tools and functions
- Reporting and report-writing capabilities
- Database administration and modification
- Database tables, field definitions, formats, and valid values
- Record management activities
- Vendor support procedures
- Technical support processes
- Third-party functionality
- Upgrade training when new functionality is introduced

Conduent provides all equipment, facility, and environment requirements needed for hands-on training at least thirty calendar days before the training start date.

## Role-Based Training Matrix

Conduent develops a Role-Based Training Matrix that maps learning objectives, delivery methods, training content, and proficiency expectations to each user community. Table VI.A.2.II.d.6-1 provides examples of role-based training and learning objectives.

**Table VI.A.2.II.d.6-1. Role-Based Training Matrix and Learning Objectives**

| Training Audience | Role-Based Training Topics and Hands-On Exercises |
|---|---|
| **Rebate Analysts and Program Staff** | • Review utilization data and validate rebate eligibility<br>• Process rebate invoices and monitor collections<br>• Research manufacturer disputes and document resolutions<br>• Track rebate performance metrics and generate operational reports<br>• Manage rebate adjustments, reversals, and reconciliation activities |
| **Supervisors and Program Managers** | • Monitor workload queues and processing status<br>• Review key performance indicators (KPIs) and operational dashboards<br>• Track rebate collections and financial performance<br>• Manage escalated disputes and workflow exceptions<br>• Use reports and analytics to support program oversight and decision-making |
| **System Administrators** | • Manage user accounts, roles, and security permissions<br>• Configure system parameters and business rules<br>• Maintain reference tables and system settings<br>• Monitor batch processes, interfaces, and system performance<br>• Execute administrative functions related to system maintenance and upgrades |
| **Technical Support and Operations Staff** | • Troubleshoot user-reported issues<br>• Review system logs and diagnostic information<br>• Manage incidents, service requests, and escalation procedures<br>• Monitor SLA performance and operational service levels<br>• Support system upgrades, patches, and production deployments |
| **DHHS Reporting and Business Users** | • Run standard and ad hoc reports<br>• Create report parameters and export files<br>• Interpret rebate, financial, and operational data<br>• Validate report results and identify data discrepancies<br>• Use reporting tools to support compliance and program management activities |
| **Executive and Leadership Stakeholders** | • Access executive dashboards and summary reports<br>• Monitor rebate program performance and trends<br>• Review financial outcomes and collection metrics<br>• Leverage system analytics to support strategic planning and decision-making |

This targeted approach aligns training content with day-to-day responsibilities and supports effective knowledge transfer across all user groups.

## Knowledge Transfer and Operational Readiness

Conduent equips DHHS personnel to independently administer, support, maintain, and optimize the MDR solution following implementation.

Knowledge transfer activities address:

- System administration procedures
- Configuration management activities
- System maintenance activities
- Database administration practices
- Troubleshooting and issue resolution
- Incident management processes
- Security administration
- Reporting administration
- Service Level Agreement (SLA) responsibilities
- Operational readiness activities
- Long-term sustainability practices

Through administrator workshops, operational walkthroughs, collaborative work sessions, hands-on practice, and scenario-based exercises, staff gain practical experience managing day-to-day operations and resolving issues efficiently.

Transition support activities prepare designated DHHS personnel to assume responsibility for system administration, user support, operational monitoring, maintenance activities, and issue resolution.

Operations staff receive training on SLA performance requirements, incident response procedures, service request management, escalation protocols, monitoring activities, and operational support responsibilities. This instruction prepares DHHS personnel to support MDR operations in accordance with contractual service objectives and established performance expectations.

## Adapting Training to Role Changes and Organizational Needs

Conduent recognizes that user responsibilities may evolve over time due to organizational changes, staffing transitions, business process improvements, system enhancements, or expanded program responsibilities. To support workforce agility, our training program is designed to adapt to changing roles and knowledge requirements throughout the solution lifecycle.

When an employee transitions into a new role, assumes additional responsibilities, or requires cross-functional knowledge, Conduent works with DHHS to identify training gaps. We then assign the appropriate learning path, curriculum, and reference resources. Training may include targeted instructor-led sessions, self-paced eLearning modules, mentoring opportunities, hands-on workshops, and knowledge transfer sessions focused on the user's new responsibilities.

For example, a rebate analyst transitioning into a supervisory role may receive additional training in workflow management, reporting and analytics, performance monitoring, dispute escalation procedures, and operational oversight. Likewise, a business user assuming system administration responsibilities would receive supplemental instruction on user security management, configuration settings, system maintenance activities, and troubleshooting procedures.

We maintain training materials, user guides, operational documentation, and online resources under version control and update them to reflect changing business processes and system functionality. This flexible approach supports workforce agility and continued proficiency.

## Measuring Training Effectiveness and Workforce Readiness

Conduent measures training effectiveness using quantitative and qualitative performance indicators that provide visibility into workforce readiness and training outcomes.

Metrics include:

- Training completion rates
- Knowledge assessment scores
- Attendance and participation levels
- User satisfaction survey results
- Proficiency evaluations
- Adoption and utilization metrics
- Operational readiness indicators

Participants complete training evaluations following instruction. Conduent analyzes results, identifies improvement opportunities, and recommends targeted actions when additional support is beneficial.

When assessments indicate knowledge gaps, Conduent provides supplemental training, focused coaching, and updated learning materials, as appropriate, to improve user proficiency.

Following training completion, Conduent presents training outcomes, readiness findings, identified risks, and corrective actions to support DHHS review and approval activities before advancing to the next project phase.

## Ongoing Training and Continuous Learning

Conduent supports workforce development through ongoing training and continuous learning resources available throughout the contract period.

Services include:

- Refresher training
- New employee onboarding
- Release and enhancement training
- Updated user guides and job aids
- Online tutorials
- Role-based learning modules
- Targeted coaching and mentoring

[redacted] serves as a centralized platform for training, knowledge management, and employee support. Authorized users receive 24x7 access to training materials, user and administrator documentation, FAQs, business rules, policies, procedures, and reference resources.

The platform includes advanced search functionality, context-sensitive online help, printable materials, version-controlled content, revision history tracking, and role-based access controls. Conduent updates content as functionality evolves and business requirements change.

Report documentation includes report purpose, narrative descriptions, field definitions, calculation methodologies, subtotal and total explanations, report-specific code definitions, sample outputs, and instructions for requesting and generating reports.

Through this comprehensive methodology, Conduent prepares DHHS personnel to confidently use, administer, support, and optimize the MDR solution. Our approach strengthens workforce readiness, accelerates adoption, reduces transition challenges, and helps DHHS maximize the value of its MDR investment.

## VI.A.2.II.d.7 Pre Implementation Narrative [RFP V.D.8]

**REQUIREMENT: RFP Section V.D.8**

Perform each of the following tasks as indicated below. Describe its methodology to accomplish all the tasks as stated directly below. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

***Conduent's proven pre-implementation approach minimizes risk for Nebraska DHHS, supporting a seamless, secure, and successful MDR System Go-Live.***

**Minimizing Risk, Maximizing Readiness**

Our proven Medicaid implementation methodology equips Nebraska DHHS with the planning, validation, and support needed to achieve a low-risk transition, protect critical rebate operations, and realize value from the MDR System on Day One.

Conduent brings more than 25 years of Medicaid Drug Rebate Program experience, supports approximately $5 billion in annual rebate collections, and maintains a record of meeting every CMS-required rebate deadline. We apply this experience throughout pre-implementation activities to minimize risk, validate readiness, and provide a successful Nebraska DHHS MDR System deployment. Our proven implementation methodology combines disciplined project governance, operational readiness management, CMS-aligned testing framework, and comprehensive stakeholder engagement for a successful transition to the new Medicaid Drug Rebate (MDR) System.

Conduent's pre-implementation approach prepares Nebraska DHHS for a controlled transition from its current rebate operations to CMdS Rebate Administration. Ninety days before go-live, we submit the Implementation Plan for DHHS review and approval. The plan coordinates the documentation, production preparation, data migration, interface activation, training, security, business continuity, and operational readiness activities needed for deployment.

The Implementation Plan guides the final 60 days before go-live. It defines responsibilities, dependencies, implementation checklists, release and cutover activities, knowledge transfer, risk and issue management, contingency and backout procedures, and the evidence required to confirm readiness.

At formal checkpoints 60, 45, and 30 days before go-live, Conduent and DHHS review progress against approved Go/No-Go criteria. We address deficiencies, retest corrective actions, and confirm readiness across the solution, data, interfaces, production environment, security, training, documentation, and support operations. Before deployment, Conduent provides formal certification that the MDR solution is technically ready, while DHHS retains final approval to proceed to production.

Conduent brings DHHS a low-risk modernization partner with a CMS-certifiable, operational drug-rebate platform, already aligned to Nebraska's workflow. We confirm our capabilities for pre-implementation in Attachment A PMI-01 to PMI-24, as they apply to this section response.

## Pre-Implementation

We specifically designed our pre-implementation methodology to provide DHHS with complete visibility, operational readiness, and confidence before production deployment. We combine proven Medicaid implementation experience, CMS certification expertise, structured project governance, rigorous testing, comprehensive training, and disciplined operational readiness assessments to provide a successful and low-risk Go-Live. Our approach integrates all activities necessary to achieve full MDR functionality. This includes operational transition planning, release management, knowledge transfer, security validation, business continuity readiness, stakeholder communications, and production support preparation.

A challenge our client partners may experience is defining business rules when implementing new technology. Our implementation strategy relies on early agreement with you on your rules and expectations for how the Genesys Cloud solution supports your operational business needs. To overcome this challenge, we collaborate with DHHS to understand your business model, your processes, and desired outcomes. Rules are documented and approved by you before system configuration begins. By understanding your requirements, we can minimize Cloud configuration misalignments that might affect system performance, overall operations, and the customer experience.

Figure VI.A.2.II.d.7-1 illustrates our shared success model, in which DHHS plays an active role in defining business requirements, reporting needs, and implementation goals. This collaborative approach enables early validation, proactive issue resolution, and more effective preparation for go-live.

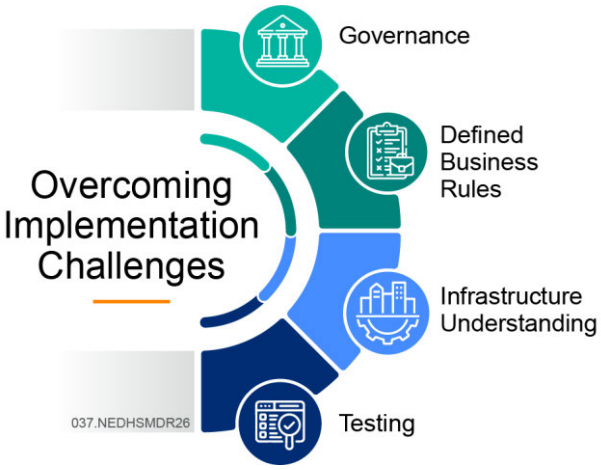



**Figure VI.A.2.II.d.7-1. Overcoming Implementation Challenges**
*Implementation challenges are mitigated through collaboration, planning, and applying proved project management practices.*

### *a. Technical and User Documentation*

Comprehensive user documentation is key in successful adoption, operational readiness, and long-term sustainability of the MDR solution. By providing clear, accessible, and role-based documentation, DHHS personnel at every level – from business users to system administrators – are equipped with the knowledge and resources needed to perform their responsibilities effectively and confidently throughout the life of the system.

Well-structured user manuals, operational guides, training materials, online help resources, and reference documentation provide a consistent source of truth for system functionality, business processes, reporting, and day-to-day operations. These resources help DHHS personnel perform critical Medicaid Drug Rebate activities accurately and consistently. They also support operational efficiency while reducing the risk associated with knowledge gaps, staff turnover, and changing business needs.

For DHHS personnel, documentation serves as more than a training tool. It becomes an ongoing operational asset. New staff can be onboarded more quickly, experienced users can efficiently resolve questions and issues, and support personnel can maintain continuity of operations without unnecessary dependence on vendor resources. As system enhancements are introduced over time, current and well-maintained documentation enables users to readily understand and adopt new functionality while preserving established business processes.

Equally important, comprehensive documentation preserves institutional knowledge and provides transparency into system operations, workflows, business rules, reporting logic, and administrative functions. This strengthens DHHS's ability to support compliance activities, maintain operational consistency, and confidently manage the MDR solution throughout its lifecycle.

The result is a sustainable knowledge framework that empowers DHHS users, supports operational excellence, accelerates workforce readiness, and enables the organization to fully realize the long-term value of its MDR investment.

Conduent prepares and delivers a complete suite of technical, operational, and user documentation for DHHS review and approval. Documentation development begins during requirements validation and continues throughout design, configuration, testing, and implementation to make sure all materials accurately reflect the final production solution. We maintain all deliverables under formal version control and store them within a secure project repository accessible to authorized DHHS personnel. Documentation delivered to DHHS includes:

- Operations Manuals
- Data Dictionary
- Step-by-Step Procedures for completing functions in the system
- System Documentation
- User Manuals
- System Navigation Documentation
- Online Help Documentation
- Policies and Procedures Documentation
- Error Message Documentation and resolution instructions
- Report Documentation and Definitions
- Administrator and User Training Materials
- Printable Training Manual

Prior to submission, each document undergoes internal quality assurance reviews, stakeholder walkthroughs, requirements traceability validation, and executive approval to support accuracy, completeness, and operational readiness.

### *b. Implementation Plan*

We develop and maintain a comprehensive Implementation Plan that is submitted to DHHS at least 90 days prior to Go-Live and serves as the operational roadmap for deployment readiness, production transition, and solution stabilization. Distinct from the overall Project Plan, the Implementation Plan governs all activities beginning 60 days before Go-Live and provides DHHS with complete visibility into readiness milestones, implementation dependencies, resource responsibilities, deployment activities, and risk mitigation strategies.

The Implementation Plan is specifically tailored to the deployment of the Conduent Medicaid Drug Rebate solution, including rebate operations workflows, dispute management processes, customer support functions, CMS certification activities, and the interfaces supporting inbound and outbound data exchanges. By establishing formal readiness checkpoints at 60, 45, and 30 days prior to Go-Live, DHHS gains a structured framework for validating that all business, operational, technical, security, and training activities have been completed before production deployment.

The plan details production deployment activities, Operational Readiness Review milestones, implementation checkpoints, cutover procedures, data conversion execution, system and interface verification, security validation, business continuity and disaster recovery readiness, stakeholder communications, contingency planning, rollback procedures, and Go/No-Go decision criteria. These activities provide DHHS with measurable evidence that the MDR solution, supporting processes, and operational teams are prepared to successfully transition from implementation to production operations.

A key focus of our methodology is preparing DHHS personnel for long-term operational success. The Implementation Plan incorporates training completion requirements, operational simulations, knowledge transfer activities, documentation reviews, and production support preparation to help staff become comfortable with system functionality, operational procedures, reporting capabilities, support processes, and performance monitoring responsibilities before Go-Live. Comprehensive product documentation, user guides, operational procedures, and support materials further provide DHHS personnel with the resources needed to confidently perform their responsibilities after deployment.

This approach reflects our understanding that successful implementation is not simply deploying technology – it is preparing DHHS personnel, business processes, and operational teams to effectively manage and support the MDR solution from day one. By validating readiness across people, processes, technology, security, data conversion, and operational support, DHHS gains greater confidence in deployment decisions, reduced implementation risk, improved operational continuity, and a stronger foundation for achieving the program's performance, compliance, and service objectives. The Implementation Plan incorporates all elements required under RFP Section V.D.8.c and provides DHHS with a structured framework for deployment readiness, operational transition, risk management, and Go-Live decision-making.

## *c. Implementation Plan Components*

- Production deployment strategy
- Operational Readiness Review activities
- Implementation checkpoints
- Cutover activities
- Data conversion execution
- System and interface verification
- Business continuity preparation
- Security validation
- Training completion requirements
- Go/No-Go decision criteria
- Stakeholder communications
- Contingency and rollback procedures

Conduent's Implementation Plan includes, at a minimum, all required elements identified by DHHS as follows:

### *i. Release and Deployment Management*

For each new or updated MDR solution release, Conduent develops a comprehensive Release Package that serves as the authoritative roadmap for deployment, validation, and operational transition. The Release Package provides DHHS with complete visibility into the functionality being introduced, business and technical dependencies, implementation sequencing, testing outcomes, acceptance criteria, deployment requirements, rollback procedures, and stakeholder approvals. By documenting these elements in a structured and repeatable manner, DHHS gains confidence that every release has been thoroughly evaluated, tested, and prepared before introduction into the production environment

Our release management approach reflects the unique operational needs of the Medicaid Drug Rebate program, where system availability, data integrity, rebate processing accuracy, reporting reliability, and regulatory compliance directly impact program operations. Each release package incorporates verification of system functionality, interface readiness, configuration updates, security controls, operational procedures, and documentation updates to confirm that all components work together as intended and that business processes remain uninterrupted following deployment.

The Release Package also provides DHHS with a governance framework for evaluating release readiness. Through established review and approval processes, business stakeholders, technical teams, project leadership, and operational staff have the opportunity to review release content, assess impacts, validate testing results, and confirm operational preparedness prior to production deployment. This collaborative approach supports informed decision-making and helps identify and address potential issues before they affect users or program operations.

A key component of each release is operational readiness. In addition to documenting deployment activities, the Release Package confirms that supporting materials such as user documentation, operational procedures, training materials, configuration guides, and updated support processes have been completed and communicated to affected personnel. This enables DHHS staff to understand what is changing, how it affects their responsibilities, and what actions may be required following deployment.

Equally important, the Release Package includes detailed rollback and contingency procedures, allowing DHHS to clearly understand the steps to be taken should unexpected issues arise during deployment. Combined with release validation, testing results, change management controls, and implementation checkpoints, this approach minimizes operational risk, protects business continuity, and supports uninterrupted delivery of critical Medicaid Drug Rebate services.

By providing a disciplined and transparent release management process, Conduent helps DHHS maintain confidence in system changes, reduce deployment risk, improve stakeholder readiness, and sustain stable, compliant, and efficient MDR operations throughout the life of the solution.

### *ii. Implementation Checklists and Checkpoints*

We develop detailed Implementation Checklists for each formal implementation checkpoint (60, 45, and 30 days prior to Go-Live) to provide DHHS with a structured, transparent view of deployment readiness across all project workstreams. Each checklist identifies required readiness activities, accountable owners, dependencies, validation evidence, risks, issues, corrective actions, and approval status, providing DHHS leadership with a clear understanding of project progress and any remaining actions required before deployment. The checklists encompass all critical readiness areas:

- System configuration
- Interface validation
- Data conversion and migration
- Security controls
- User access administration
- Training completion
- Operational procedures
- Business continuity and disaster recovery testing
- Documentation readiness
- Production support preparation

Supporting evidence such as testing results, conversion outcomes, training records, security validations, and operational readiness assessments allows DHHS to evaluate readiness based on measurable results rather than assumptions.

By providing complete visibility into readiness activities, dependencies, and stakeholder approvals, the checklists support informed Go/No-Go decisions, promote accountability across project teams, and help identify and address potential issues before they affect operations. This approach reflects our understanding that successful deployment requires readiness across people, processes, technology, data, and operational support – not just technical implementation. As a result, DHHS gains greater confidence in deployment decisions, reduced implementation risk, and a stronger foundation for successful, sustainable MDR operations.

### *iii. Compatibility Verification*

Prior to deployment, we perform comprehensive compatibility validation across all components of the MDR release package. We confirm that application components, databases, interfaces, security services, reporting functions, infrastructure components, and external partner integrations operate together as a cohesive solution. These validations verify that configuration changes, system updates, data exchanges, and dependent services function as intended across the production environment and support the end-to-end business processes required for Medicaid Drug Rebate operations.

This approach provides DHHS with confidence that critical system functions, reporting capabilities, security controls, and inbound and outbound interfaces have been validated prior to deployment. This reduces operational risk and minimizes the potential for service disruptions after Go-Live. It also supports informed deployment decisions by providing evidence that all release components have been tested together and are ready to support production operations.

By validating compatibility across the entire solution ecosystem, not just individual components, we help DHHS achieve a stable, reliable deployment while protecting the continuity of rebate processing, reporting, user operations, and ongoing system support. This reflects our understanding that successful implementation depends on the readiness of the complete operating environment. This means the people, processes, data, and technologies that support your MDR program operations. Prior to deployment, we perform compatibility validation across all components within the release package, including:

- MDR application components
- Databases
- System interfaces
- Security services
- Reporting services
- Infrastructure components
- External partner integrations

These validations confirms that all assets operate together as a fully integrated solution.

### *iv. Configuration Management*

Our formal configuration management process provides DHHS with full visibility and control over all MDR solution releases throughout the implementation lifecycle. Using established configuration and change management procedures, we maintain version control, traceability, and integrity for all configuration items. Included in this is MDR application components, business rules, interfaces, reporting objects, security configurations, database structures, and deployment artifacts. Each release is validated through controlled migration processes that track changes from development through testing, user acceptance, operational readiness, and production deployment. Configuration baselines, release contents, dependencies, testing results, approvals, and deployment records are maintained to provide DHHS with a clear audit trail of what changes are being implemented, why they are being implemented, and how they were validated.

Prior to deployment, we verify that all release components, including application updates, interface modifications, reporting enhancements, security changes, data conversion activities, and supporting documentation, have been approved, tested, and packaged together correctly. This validation prevents unauthorized changes, configuration drift, version conflicts, and integration issues that could affect rebate processing, reporting, data exchanges, or system performance.

This disciplined approach supports DHHS's need for a stable, secure, and predictable production environment while providing assurance that only approved and tested components are promoted into production. The result is greater deployment confidence, reduced operational risk, improved auditability, and stronger protection of critical Medicaid Drug Rebate business functions throughout implementation and ongoing operations.

### *v. Release Tracking, Installation, Verification, and Backout*

Conduent manages each MDR release through a controlled release management process. This is designed to protect system stability, data integrity, and uninterrupted rebate operations. Every release package is tracked, installed, tested, verified, promoted to production, and, if necessary, backed out using documented deployment and rollback procedures. This approach reduces implementation risk, maintains compliance with CMS and State requirements, and minimizes disruption to rebate processing, manufacturer invoicing, reporting, and other critical MDR functions.

Prior to production deployment, releases undergo a series of validation activities that confirm the solution, interfaces, and supporting components function as expected within the target environment. These include:

- Release tracking
- Installation validation
- Smoke testing
- Interface verification
- Functional testing
- User validation
- Production acceptance
- Rollback testing and verification

For the MDR solution, these validations confirm the accurate processing of rebate data, proper operation of inbound and outbound interfaces, integrity of manufacturer and claims information, and continued availability of reporting and compliance functions. This structured approach enables DHHS to implement system updates, regulatory changes, and operational enhancements with confidence while reducing the potential for service interruptions or processing errors.

Should an issue arise following deployment, documented rollback procedures support rapid restoration to the previous stable environment. By regularly validating backout processes and maintaining deployable recovery packages, Conduent minimizes operational risk and maintains continuity of critical MDR activities, including rebate invoicing, dispute management, CMS reporting, and user access to the solution.

### *vi. Risk, Issue, and Deviation Management (RAID)*

Conduent maintains a centralized RAID (Risks, Assumptions, Issues, and Decisions) repository to provide DHHS with complete visibility into project activities, dependencies, and potential obstacles throughout implementation. This repository serves as a single source of truth for project governance and supports proactive decision-making, timely issue resolution, and continuous alignment with project objectives, timelines, and CMS certification requirements.

By continuously identifying and managing risks, assumptions, issues, decisions, and project deviations, Conduent reduces the likelihood of schedule delays, scope impacts, integration challenges, and operational disruptions that could affect implementation success or readiness for production deployment. This structured approach also allows DHHS stakeholders to clearly understand project status, evaluate potential impacts, and make informed decisions before issues escalate.

Each repository item is assigned an owner, prioritized based on impact and urgency, and monitored through established governance and project management processes. Regular reviews are conducted with DHHS project leadership and stakeholders to assess status, evaluate mitigation strategies, and identify emerging concerns. When corrective action is required, Conduent documents resolution activities, target completion dates, accountable parties, and outcome measurements to support timely closure and accountability.

This disciplined governance process maintains project momentum, supports coordination across technical and business teams, and promotes successful delivery of critical activities such as system configuration, interface implementation, data conversion, testing, training, operational readiness, and CMS certification. By proactively managing risk and issue resolution, Conduent helps DHHS maintain schedule confidence, minimize implementation risk, and achieve a successful transition to ongoing MDR operations.

### *vii. End User Knowledge Transfer*

Conduent delivers a comprehensive knowledge transfer and training program designed to help DHHS users confidently perform their day-to-day MDR responsibilities and maximize the value of the solution from the first day of operation. Effective user adoption is critical to maintaining timely rebate invoicing, accurate financial reconciliation, effective dispute resolution, manufacturer collaboration, and ongoing compliance with CMS and program requirements. Our approach focuses not only on system navigation and functionality, but also on how users apply the solution to support Nebraska's Medicaid Drug Rebate business processes.

The program includes role-based training, hands-on learning sessions, user documentation, job aids, workshops, knowledge transfer activities, and refresher training tailored to the responsibilities of each user group. Training scenarios, exercises, and supporting materials are configured around Nebraska-specific MDR workflows, enabling users to gain practical experience performing key activities within the system.

Training content addresses the end-to-end processes required to support rebate operations, including rebate invoicing, dispute management, manufacturer communications, collections management, reporting, financial reconciliation, and compliance-related activities. Hands-on exercises allow users to work through realistic business scenarios, so they understand how system functions support operational objectives and how to efficiently perform their responsibilities within the new environment.

To reinforce knowledge retention and long-term operational success, Conduent provides comprehensive user documentation, process guides, job aids, and reference materials that support ongoing learning after training is complete. Throughout the training process, we gather participant feedback, assess knowledge transfer effectiveness, and address any identified gaps to support user readiness.

By combining role-based instruction, practical exercises, and Nebraska-specific business scenarios, Conduent helps DHHS users build the skills and confidence needed to effectively leverage all MDR functionality, support uninterrupted business operations, and achieve a smooth transition to production.

### *viii. Operations Staff Knowledge Transfer*

Operational readiness activities focus on preparing DHHS personnel to successfully support and sustain all aspects of the MDR solution from day one of production operations. Using comprehensive product documentation, operational procedures, role-based training materials, and knowledge transfer activities, the readiness program equips operations staff with the skills and resources necessary to effectively administer, monitor, and support the solution while meeting established service levels and performance expectations.

Readiness activities are tailored to the unique operational needs of the Medicaid Drug Rebate program and emphasize the business processes, workflows, reporting requirements, dispute management activities, data management functions, and operational controls necessary to support ongoing rebate operations. Training and mentoring are designed to develop both technical proficiency and operational confidence, enabling personnel to effectively manage day-to-day activities while maintaining program continuity and service quality.

Operations personnel receive detailed training and hands-on experience covering:

- System administration and user management
- Monitoring, support, and troubleshooting procedures
- Configuration and change management processes
- Incident and issue management
- Security administration and access controls
- Business continuity and disaster recovery procedures
- Release and deployment management
- Operational reporting and performance monitoring
- Service level agreement (SLA) monitoring and performance metrics

Training is reinforced through operational simulations, scenario-based exercises, shadowing activities, documentation reviews, production support preparation, and readiness assessments. Together, these activities provide DHHS personnel with the knowledge, tools, and practical experience needed to confidently support Medicaid Drug Rebate operations, respond to operational challenges, and maintain service continuity throughout the life of the solution.

Training and operational readiness activities prepare operations personnel to meet all contracted service levels, support obligations, monitoring requirements, and performance metrics established for the MDR solution.

## *d. Pre-Implementation Activities*

### *i. Implementation Assessment and Pre-Operational Transition Plan*

A successful transition to a new MDR solution depends on understanding how DHHS currently administers rebate operations, manages data, supports users, and maintains compliance before transition activities begin. Conduent conducts a comprehensive assessment of the current operating environment to identify business, technical, and operational dependencies that could affect implementation success, operational readiness, or continuity of rebate operations.

This assessment helps DHHS reduce implementation risk by identifying process gaps, data conversion challenges, interface dependencies, reporting requirements and security considerations. It also identifies staffing needs, and organizational readiness requirements early in the project lifecycle. By addressing these factors proactively, DHHS can minimize disruption to critical functions such as rebate invoicing, dispute management, manufacturer communications, collections, financial reconciliation, reporting, and CMS compliance activities.

Conduent evaluates current MDR business workflows, rebate administration processes, operational procedures, data assets, system interfaces, reporting requirements, security controls, user roles, and supporting documentation. This analysis confirms that business, technical, and operational requirements are fully understood and incorporated into transition planning, operational readiness activities, data conversion planning, business process alignment, knowledge transfer activities, and preparation for ongoing MDR operations.

Conduent documents findings within a detailed Pre-Operational Transition Plan that serves as the roadmap for transitioning from current-state operations to the new MDR solution. The plan identifies migration activities, operational transition requirements, staffing considerations, knowledge transfer needs, business continuity measures, risk mitigation strategies, operational dependencies, and readiness milestones required to support a successful implementation and transition to production operations.

By establishing a comprehensive understanding of the current environment and aligning transition activities to Nebraska's specific MDR business processes, Conduent helps DHHS maintain continuity of rebate operations, support user readiness, minimize operational disruption, and achieve a smooth transition to the new MDR solution while maintaining compliance with CMS and State requirements.

### *ii. Implementation Checklists*

Providing a successful MDR go-live requires more than completing implementation tasks. It requires confirming that business, technical, operational, and organizational readiness activities have been completed and validated before the solution is placed into production. Conduent develops and submits detailed Implementation Checklists that provide DHHS with a structured framework for evaluating readiness, identifying potential gaps, and supporting informed go-live decisions. Implementation Checklists are provided for DHHS review and approval at the following checkpoints:

- 60 Days Prior to Go-Live
- 45 Days Prior to Go-Live
- 30 Days Prior to Go-Live

These checkpoints provide DHHS with progressively greater visibility into project readiness and allow sufficient time to address outstanding items before production deployment. By validating readiness throughout the implementation lifecycle, DHHS can better prepare for system cutover, reduce operational risk, and support continuity of critical MDR business functions.

Each checklist includes readiness requirements, validation criteria, assigned ownership, evidence of completion, dependencies, identified risks, mitigation activities, and approval status. Readiness activities may include business process preparation, data conversion readiness, interface readiness, security and access validation, operational support preparedness, user training completion, documentation readiness, and business continuity considerations.

The Implementation Checklists serve as a governance tool that enables DHHS and project stakeholders to monitor progress, assess readiness, and resolve issues before they affect production operations. This structured approach reduces the potential for deployment delays, supports operational readiness, and promotes a smooth transition to the new MDR solution while maintaining compliance with CMS and State requirements.

### *iii. Go/No-Go Standards*

Conduent supports DHHS with a successful implementation using objective, measurable criteria. This criteria determines whether the solution, users, and supporting operations are prepared for production deployment. Conduent develops formal Go/No-Go standards that provide DHHS with a structured framework for evaluating implementation readiness, identifying unresolved risks, and making informed deployment decisions at key implementation checkpoints.

The Go/No-Go standards help DHHS assess whether critical business, technical, security, and operational requirements have been satisfactorily completed before transitioning to production. By establishing clear readiness criteria, we support DHHS's objective to reduce deployment risk, improve stakeholder confidence, and better prepare for continuity of rebate operations, manufacturer communications, reporting, and CMS compliance activities.

- Infrastructure readiness
- Security compliance
- Testing completion
- Data migration readiness
- Interface readiness
- User training readiness
- Operational support readiness
- Business continuity readiness
- Documentation approval
- Production support readiness

For your MDR solution, these readiness criteria validate that system components, interfaces, data assets, security controls, operational procedures, user training activities, and support processes are sufficiently prepared to support day-to-day rebate operations. The standards provide a consistent approach for evaluating outstanding issues, dependencies, risks, and mitigation activities that could affect production readiness.

Conduent submits the Go/No-Go standards to DHHS for review and approval prior to implementation checkpoints. The standards serve as a governance and decision-support tool that enables DHHS stakeholders to evaluate readiness, address identified gaps and determine whether the project is prepared to advance toward production deployment. This structured approach reduces operational risk, supports informed decision-making, and promotes a smooth transition to the new MDR solution.

### *iv. Readiness Testing*

Successful implementation of the MDR solution requires more than completing project tasks. It requires validating that business, technical, operational, and organizational readiness activities have been completed and that identified risks have been addressed before advancing to the next phase. At each Implementation Checkpoint, Conduent executes approved readiness tests against the applicable Implementation Checklist, validates completion status and supporting evidence, and facilitates structured readiness reviews with DHHS and project stakeholders.

These checkpoint reviews provide DHHS with an objective assessment of project readiness and help identify gaps, unresolved dependencies, or emerging risks before they affect implementation timelines or operational readiness. By evaluating readiness at defined intervals, DHHS gains greater visibility into project status and can make informed decisions regarding progression to subsequent implementation activities and production deployment.

Readiness review meetings include implementation task owners, technical leads, business stakeholders, and DHHS representatives. During each session, participants review readiness criteria, assess completion of required activities, evaluate supporting evidence, discuss outstanding issues and mitigation plans, and determine whether established Go/No-Go standards have been satisfied.

For the MDR solution, these reviews verify that rebate invoicing, dispute management, manufacturer communications, collections processing, reporting, financial reconciliation, interface processing, and CMS compliance activities are prepared to support production operations. Early identification of readiness gaps enables DHHS and project stakeholders to address issues before they affect users, manufacturers, operational performance, regulatory compliance, or implementation timelines.

The checkpoint process serves as a key governance and risk-management tool that enables DHHS to evaluate readiness, address identified concerns, and support informed implementation decisions. By validating readiness throughout the implementation lifecycle, Conduent helps DHHS identify and resolve issues before production deployment, reduce operational risk, improve stakeholder confidence, and support a smooth transition to ongoing MDR operations.

### *v. Readiness Assessment Support*

We provide DHHS with comprehensive assistance throughout every readiness assessment, including readiness reports, risk analyses, testing evidence, checkpoint summaries, and formal vendor recommendations using approved Go/No-Go criteria.

Successful implementation of the MDR solution requires validating readiness before advancing to the next phase. At each Implementation Checkpoint, Conduent executes approved readiness tests, validates completion status and supporting evidence, and facilitates structured readiness reviews with DHHS and project stakeholders.

These reviews provide DHHS with an objective assessment of project readiness and help identify gaps, dependencies, or risks before they affect implementation timelines or operational readiness. Participants review readiness criteria, supporting evidence, outstanding issues, mitigation plans, and Go/No-Go requirements to determine whether the project is prepared to proceed.

For the MDR solution, checkpoint reviews assess readiness for rebate invoicing, dispute management, manufacturer communications, collections processing, reporting, financial reconciliation, interface processing, and CMS compliance activities. Early identification of readiness gaps enables DHHS to address issues before they affect users, manufacturers, operational performance, or implementation schedules.

By validating readiness throughout the implementation lifecycle, Conduent helps DHHS reduce operational risk, improve stakeholder confidence, and support a smooth transition to ongoing MDR operations.

### *vi. Deficiency Remediation*

At DHHS's election, Conduent promptly remediates any deficiencies resulting in a No-Go determination, conducts corrective testing, and provides objective evidence that all issues are resolved to DHHS's satisfaction before proceeding. A No-Go determination provides DHHS with an opportunity to address critical readiness gaps before production deployment. At DHHS's election, Conduent promptly remediates identified deficiencies, performs corrective testing, and provides objective evidence demonstrating resolution of outstanding issues. This approach reduces deployment risk and supports readiness for critical MDR functions, including rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, and CMS compliance activities. By resolving issues before advancing to the next phase, DHHS can make informed deployment decisions and better prepare for a successful transition to production operations

### *vii. Business Continuity and Disaster Recovery Plans*

Business Continuity and Disaster Recovery (BC/DR) planning is essential to protecting MDR operations and preparing DHHS to respond to system disruptions, infrastructure failures, cybersecurity events, or other unplanned incidents. Conduent develops BC/DR plans that support continuity of critical functions, including rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, and CMS compliance activities. The plans define:

- Recovery Time Objectives (RTOs)
- Recovery Point Objectives (RPOs)
- Failover procedures
- Escalation protocols
- Communication protocols
- Backup and restoration procedures
- Infrastructure recovery procedures and recovery sequencing
- Emergency response activities

By establishing clear recovery procedures, roles, and response activities, DHHS can better prepare for operational disruptions, reduce recovery risk, and support continuity of MDR services and business operations. All plans are submitted to DHHS for review and approval.

### *viii. Business Continuity and Disaster Recovery Testing*

Business Continuity and Disaster Recovery (BC/DR) testing is essential to confirming that recovery strategies, technologies, and operational procedures can support MDR operations during a disruption. Conduent conducts comprehensive BC/DR testing to validate recovery procedures, backup integrity, failover capabilities, communication protocols, and operational restoration activities before they are needed in a production event.

For the MDR solution, testing assesses readiness to recover critical functions such as rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, and CMS compliance activities. By validating recovery processes in advance, DHHS can identify potential gaps, strengthen recovery preparedness, and reduce operational risk associated with unplanned outages or emergency events.

Following each exercise, Conduent provides DHHS with detailed test results, observations, identified gaps, and recommended corrective actions. Improvement opportunities are tracked through resolution activities to support ongoing operational resilience, recovery readiness, and continuity of MDR operations.

### *ix. Infrastructure Plan Execution*

Production readiness is critical to a successful MDR implementation. Prior to Go-Live, Conduent validates that the production environment is prepared to support daily rebate operations, system users, interfaces, security requirements, and operational support processes. This readiness verification helps DHHS reduce deployment risk, identify potential issues before production use, and confirm the environment is prepared to support critical business functions. We execute the Infrastructure Plan and validate production readiness through:

- Infrastructure validation testing
- Performance testing
- Security testing
- Interface testing
- Failover testing
- Operational readiness verification

These activities assess readiness for rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, and CMS compliance activities. Testing also provides visibility into infrastructure performance, system availability, security controls, and operational support preparedness before production deployment.

Upon completion of testing and readiness activities, Conduent formally certifies that the production environment has completed the required validation activities and is prepared for Go-Live. Through this structured approach DHHS can make informed deployment decisions, reduce operational risk, and support a smooth transition to production operations.

### *x. Contingency and War Room Structure*

Go-Live readiness includes preparing for potential issues and establishing a clear process for responding to them. Conduent develops a comprehensive Contingency Plan that incorporates the DHHS-requested triage/war room structure and provides a structured framework for identifying, prioritizing, escalating, communicating, and resolving Go-Live issues while supporting continuity of critical MDR operations.

The Contingency Plan includes:

- Incident command structure
- Severity classifications
- Executive escalation processes
- Communication protocols
- Decision authority matrix
- Rollback criteria
- Restoration procedures

These procedures help DHHS respond to issues that could affect rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, or CMS compliance activities. The plan establishes clear roles, responsibilities, escalation paths, and decision authorities to support timely issue resolution and effective stakeholder communication during deployment.

Should DHHS elect to remove the MDR solution from production, the Contingency Plan provides a controlled approach for executing approved rollback and restoration procedures to support the transition to current-state operations. This structured approach reduces operational risk, improve deployment preparedness, and support continuity of MDR services throughout Go-Live activities for DHHS.

### *xi. Cutover Plan*

Conduent's MDR go-live depends on a well-coordinated transition from implementation activities to production operations. Conduent develops a detailed Cutover Plan that provides DHHS with a structured approach for deploying the MDR solution, coordinating stakeholders, managing dependencies, and reducing operational risk during production transition. The plan includes:

- Final production deployment activities
- Data conversion execution
- Interface activation procedures
- Connectivity testing
- Production readiness validation
- Business acceptance activities
- Rollback procedures

The plan coordinates activities that support rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, and CMS compliance functions. Defined roles, responsibilities, sequencing, validation activities, and decision points offer DHHS visibility into cutover progress and readiness throughout the transition process.

Prior to production deployment, Conduent validates interfaces and coordinates with interface partners to confirm readiness for production operations. This validation identifies and addresses potential issues before go-live and supports the accurate exchange of data across the MDR ecosystem.

By establishing a structured cutover approach, DHHS can better prepare for production deployment, reduce transition risk, and support a smooth transition to ongoing MDR operations.

### *xii. Data Security Plan and Security Readiness*

Protecting sensitive Medicaid, rebate, financial, and manufacturer data is critical to maintaining program integrity, regulatory compliance, and stakeholder trust. Conduent executes a comprehensive Data Security Plan and submits a System and Operations Security Plan for DHHS review and approval to safeguard MDR data, support secure system operations, and reduce cybersecurity risk throughout the solution lifecycle. Our MDR solution protects DHHS information through:

- Encryption of data in transit and at rest
- Role-based access controls
- Continuous monitoring
- Security event logging
- Vulnerability management
- Penetration testing
- Incident response procedures

These security controls protect critical MDR functions, including rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, and CMS compliance activities. The security framework supports the confidentiality, integrity, and availability of data while helping DHHS identify, monitor, and respond to potential security threats and vulnerabilities.

The MDR solution is designed to support compliance with HIPAA, CMS Acceptable Risk Safeguards (ARS), NIST 800-53 Moderate controls, FedRAMP security standards, and applicable Federal and State security requirements. By implementing a layered security approach, Conduent strengthens data protection, support regulatory compliance, and maintain secure, reliable MDR operations for DHHS.

### *xiii. Go-Live Contact List*

Effective Go-Live support depends on clear communication, defined escalation paths, and rapid access to the right resources when issues arise. Conduent provides and maintains a comprehensive Go-Live Contact List so DHHS can quickly coordinate responses, resolve issues, and support continuity of critical MDR operations during deployment and stabilization activities.

The Contact List includes executive sponsors, technical leads, operational leaders, support personnel, interface partners, escalation contacts, and emergency response resources. By establishing clear points of contact and escalation channels, DHHS can efficiently communicate issues, coordinate resolution activities, and maintain visibility into deployment status.

This resource supports timely response to issues that could affect rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, or CMS compliance activities. The Contact List also facilitates coordination among DHHS, Conduent, and external partners throughout Go-Live and early production support.

By maintaining current contact information and defined escalation paths, Conduent helps DHHS reduce response times, improve issue management, and support a smooth transition to ongoing MDR operations.

### *xiv. Data/File Conversion and Migration*

Accurate data conversion is essential to preserving the integrity of rebate operations, financial records, reporting, and compliance activities when transitioning to a new MDR solution. Conduent follows a disciplined file migration and conversion approach designed to help DHHS reduce data migration risk, maintain data quality, and support continuity of critical business processes.

Following DHHS approval of the Data Conversion Test Plan, Conduent performs data profiling, mapping validation, conversion testing, reconciliation, defect remediation, mock conversions, and final production migration. These activities identify and resolve data quality issues, validate conversion rules, and confirm that converted data supports business and operational requirements before production deployment.

Conversion activities prepare claims, rebate, manufacturer, financial, and operational data needed to support rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, and CMS compliance functions. Reconciliation and validation processes provide visibility into conversion accuracy and confirm that data is complete, consistent, and usable within the new environment. By validating data throughout the conversion lifecycle, Conduent helps DHHS reduce operational risk, support user confidence, and prepare for a smooth transition to production operations. This structured approach promotes a complete, accurate, and auditable data conversion while supporting ongoing MDR business activities.

### *xv. Stakeholder Communications*

Effective stakeholder communication is critical to a successful MDR implementation and Go-Live. Conduent executes the pre-Go-Live communication activities defined in the Stakeholder Communications Plan so DHHS maintains alignment across business, technical, operational, and external stakeholder groups while preparing for production deployment.

Timely and targeted communications provide stakeholders with visibility into implementation progress, upcoming activities, training opportunities, deployment readiness, and support resources. This approach reduces uncertainty, promotes user preparedness, and supports informed decision-making throughout the implementation process.

Communications are tailored to the needs of DHHS leadership, business users, technical staff, manufacturers, interface partners, and other stakeholders whose activities may be affected by the transition to the new MDR solution. Messaging may address implementation milestones, training schedules, operational readiness activities, deployment planning, support procedures, and other information needed to prepare stakeholders for Go-Live.

Proactive stakeholder communication supports readiness for rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, and CMS compliance activities. By providing timely, relevant, and consistent information, Conduent helps DHHS improve stakeholder engagement, support user adoption, reduce transition risk, and prepare for a smooth transition to ongoing MDR operations.

### *xvi. Pre-Go-Live Contingency Preparation*

Go-Live preparation requires more than planning for deployment. It requires confirming that contingency resources, processes, and decision-making structures are ready to respond if issues arise. Prior to Go-Live, Conduent completes all activities necessary to support immediate activation of the Contingency Plan, helping DHHS prepare for potential operational, technical, or implementation-related challenges during deployment.

Readiness activities include staffing assignments, escalation preparedness, communication planning, rollback readiness, system recovery validation, and activation of the DHHS-requested triage/war room structure. These activities establish clear roles, responsibilities, communication paths, and response procedures before production deployment begins.

Contingency readiness supports timely response to issues that could affect rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, or CMS compliance activities. By preparing key personnel, response processes, and recovery procedures in advance, DHHS can more effectively manage issues, coordinate resolution efforts, and reduce operational risk during Go-Live.

This proactive approach improves deployment preparedness, strengthen issue-response capabilities, and support continuity of MDR operations throughout implementation and early production activities.

### *xvii. Third-Party Audit Support*

Independent readiness assessments provide DHHS with an objective evaluation of implementation progress, operational readiness, and deployment preparedness prior to Go-Live. Conduent fully supports DHHS and its designated readiness assessment vendor by providing timely access to the information, resources, and personnel needed to conduct a thorough and efficient review.

Conduent provides implementation evidence, testing results, security artifacts, project documentation, readiness reports, demonstrations, and access to subject matter experts. We respond to assessment requests in accordance with established project governance processes and facilitate interviews, walkthroughs, demonstrations, and evidence reviews to support the assessment effort.

These activities provide visibility into implementation status, security readiness, testing outcomes, operational preparedness, data conversion activities, interface readiness, and business process adoption for your MDR solution. This transparency helps DHHS evaluate readiness for critical functions such as rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, and CMS compliance activities.

By supporting an independent assessment process, Conduent helps DHHS identify and address readiness gaps, validate deployment preparedness, and make informed Go-Live decisions. This collaborative approach promotes accountability, reduces implementation risk, and supports a successful transition to production MDR operations.

### *xviii Final Certification of Technical Readiness for Implementation and Go Live*

Production readiness certification provides DHHS with a structured and objective assessment of whether the MDR solution is prepared to support production operations. As part of our implementation and operational readiness methodology, Conduent conducts a comprehensive readiness assessment and certification review to evaluate completion of business, technical, security, data, and operational readiness activities before Go-Live. Prior to issuing final certification, we:

- Validate successful completion of all required testing activities, including unit, system, integration, end-to-end, regression, performance, and User Acceptance Testing (UAT)
- Confirm all critical, high-priority, and Go Live-blocking defects are resolved or approved by DHHS through established governance and change-control processes
- Verify successful execution of data conversion, migration, reconciliation, and validation activities to confirm data accuracy, completeness, and integrity
- Validate all system interfaces, CMS connectivity, reporting functions, security controls, access management, and operational workflows are functioning as designed
- Confirm completion of Operational Readiness Reviews (ORR), Go/No-Go assessments, implementation checkpoints, disaster recovery readiness, business continuity planning, and production support preparations
- Verify that all required implementation deliverables, training activities, user documentation, technical documentation, certification artifacts, and production support plans are reviewed and approved by DHHS
- Confirm production environments are configured, secured, tested, and aligned with approved configuration management and deployment standards

This review assesses readiness for critical functions such as rebate invoicing, dispute management, manufacturer communications, reporting, financial reconciliation, interface processing, and CMS compliance activities. By validating readiness across these areas, DHHS gains visibility into implementation status, outstanding risks, and overall preparedness for production deployment.

Conduent documents the results within a final certification package that includes readiness assessments, testing summaries, defect status, deployment readiness results, identified risks, mitigation activities, and an executive recommendation regarding Go-Live readiness. The package provides DHHS with the information needed to support informed deployment decisions and evaluate readiness against contractual and operational requirements.

Conduent does not recommend production deployment until established readiness criteria, Go/No-Go standards, and DHHS approval requirements have been satisfied. Following DHHS approval to proceed, Conduent supports deployment activities, provides Go-Live command-center support, and monitors transition activities to support a controlled and successful transition to MDR operations.

Our pre-implementation approach is designed so that Nebraska DHHS enters Go-Live with confidence. Conduent brings rigorous planning, comprehensive readiness validation, extensive knowledge transfer, proven testing methodologies, disciplined risk management, and robust

contingency preparation. We deliver a secure, operationally ready MDR solution that minimizes implementation risk, protects critical Medicaid rebate operations, and positions DHHS for long-term success.

### VI.A.2.II.d.8 Implementation Narrative [RFP V.D.9]

**REQUIREMENT: RFP Section V.D.9**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly. Detail approach and assurances to items a. through d. of the following as it relates to Implementation:

- Change management.
- Issue management.
- Defect management.
- Process for monitoring initial operation of the implemented system.

a. Perform and Complete all Aspects of the Implementation.

Perform all activities required for successful implementation of the system into production. Upon full operation, after the system implementation, delivery of all functionalities, mitigation/resolution of concerns, DHHS will provide final approval. As such, there shall be a transition to the system being official and formally available in the production environment for all internal and external users.

b. Assist the State with On-Site Implementation Assistance for Go-Live Week (On-Site)

Provide DHHS with on-site implementation assistance for go-live week with hands-on support during the critical period when the system transitions into full operation. Upon mitigation/resolution of all concerns DHHS will provide final approval.

Responsibilities will include the following:

i. Go-live-Week Support – Monitor system performance and promptly identify any technical issues, assisting users with navigating the system and resolve any issues, document feedback and questions for post-launch analysis and improvement, and escalate any major issues to relevant teams.

ii. Ensure all key staff on-site throughout the duration of go-live week session. In the event there are substantial open unresolved issues (i.e., DHHS business operation needs), extension and/or additional on-site assistance to be required at no additional charge to DHHS.

c. Acceptance from the State on Implementation Results.

Present implementation results and address any concerns/questions raised by DHHS, to gain formal approval to proceed with the project's next phase. This includes gathering feedback, demonstrating the achieved benefits, and addressing any remaining concerns. Upon mitigation/resolution of all concerns DHHS will provide final approval.

d. Additional Information

Work performed by DHHS is subject to State and Federal statutes that may not be within the system's capabilities. This may necessitate a change order initiated by DHHS. Vendor must be responsive to making prescribed modifications promptly and in accordance with the change order process to achieve timely compliance and avoid service disruption. Pricing related to change order requests must be referenced in Part III – Optional Services Miscellaneous Support and Enhancements and/or referenced Hourly Rates per title/role on the Cost Sheet.

***Effective implementation depends on coordinated planning, transparent control points, and responsive support throughout deployment. This approach strengthens user readiness, resolves concerns quickly, and sustains reliable operations after go-live.***

## Implementation Change, Issue, and Defect Management

A structured implementation methodology supports successful system deployment, operational readiness, and full functionality. Integrated project management, testing, training, communications, governance, and support activities reduce risk and support successful outcomes. These activities support user adoption, solution quality, operational continuity, and a successful transition to production.

**Implementation Controls for Quality and Operational Readiness**

- A disciplined implementation framework combines change management, issue management, defect management, and operational monitoring to support successful deployment
- Integrated quality, governance, and support activities help achieve full functionality, mitigate risk, and promote operational readiness

### *Change Management*

A structured change management methodology drives stakeholder alignment, user adoption, operational readiness, and sustained business value while supporting full functionality and a successful transition. Change management activities begin during project startup and align with the overall implementation plan.

#### *Methodology*

- Develop a Change Management Plan that defines objectives, roles, responsibilities, communications, training, and adoption activities
- Identify stakeholders across executive, management, operational, technical, and end-user groups
- Assess organizational impacts, process changes, system changes, and workforce readiness
- Establish governance procedures for change-related decisions and escalations
- Create a change readiness baseline and adoption measurement framework

#### *Assurances*

- A structured and repeatable methodology guides all implementation phases
- Project milestones maintain complete traceability to change management activities
- Project teams review and update plans throughout the project lifecycle
- Coordinate impacts with project and operational leadership
- Impacted groups receive focused support
- Risks remain visible throughout implementation
- Mitigation activities address adoption barriers before deployment

## Issue Management

A centralized issue management process provides visibility, accountability, and control throughout implementation. Defined ownership, prioritization, escalation, reporting, and root cause analysis support timely resolution and continuous improvement. This approach minimizes project risk, supports successful implementation outcomes, and helps achieve full operational functionality.

#### *Methodology*

- Capture issues in a centralized issue management repository
- Assign a unique identifier to each issue
- Document issue description, source, impact, priority, owner, and status
- Categorize issues by business, functional, technical, operational, or project impact
- Validate issue details before assigning for resolution

### *Assurances*

- All issues receive formal documentation and tracking
- Stakeholders maintain visibility into issue status and progress
- Standardized processes support consistent issue management

## *Issue Assessment and Prioritization*

Issue assessments determine urgency, impact, and required response actions.

### *Methodology*

- Evaluate business, operational, technical, and schedule impacts
- Assess risk to project objectives, deliverables, and timelines
- Determine severity and priority levels
- Identify dependencies and affected stakeholders
- Assign resolution targets based on priority

### *Assurances*

- Critical issues receive immediate attention
- Prioritization decisions follow documented criteria
- Resolution efforts focus on issues with the greatest impact

## *Issue Ownership and Resolution*

Assigned resources investigate and resolve issues according to established procedures.

### *Methodology*

- Assign ownership for each issue
- Define corrective actions and resolution plans
- Coordinate activities across project, technical, and business teams
- Track progress through closure
- Validate resolution before completing the issue record

### *Assurances*

- Clear ownership exists for every issue
- Resolution activities follow documented procedures
- Teams verify successful resolution before closure

## *Escalation Management*

Formal escalation procedures address issues that threaten project objectives or timelines.

### *Methodology*

- Establish escalation thresholds and decision authority
- Escalate unresolved or high-risk issues to project leadership
- Engage subject matter experts when specialized support is required
- Review escalated issues during governance meetings
- Document decisions, actions, and outcomes

### *Assurances*

- Escalations occur promptly when required
- Leadership receives timely visibility into critical issues
- Escalated issues receive appropriate resources and oversight

## *Communication and Reporting*

Regular communication keeps stakeholders informed throughout the issue lifecycle.

### *Methodology*

- Provide status updates through project meetings and reports
- Maintain issue logs with status and action items
- Communicate impacts, risks, and resolution plans
- Track aging issues and resolution timelines
- Report trends and recurring issues to project leadership

### *Assurances*

- Stakeholders receive accurate and timely information
- Reporting supports informed decision-making
- Issue status remains transparent throughout implementation

## *Root Cause Analysis and Prevention*

Root cause analysis reduces recurring issues and improves project outcomes.

### *Methodology*

- Analyze significant or recurring issues
- Identify contributing factors and process gaps
- Implement corrective and preventive actions
- Update procedures, documentation, and training materials as needed
- Monitor effectiveness of implemented improvements

### *Assurances*

- Resolution efforts address underlying causes
- Corrective actions reduce issue recurrence
- Continuous improvement strengthens implementation performance

## *Integrated Supporting Functions*

Integrated supporting functions coordinate maintenance, operations, support, enhancements, and governance to sustain reliable post-implementation performance.

### *Methodology*

- Coordinate maintenance and operational support
- Centralize requests through intake channels
- Prioritize issues by business impact
- Escalate critical needs through governance
- Track actions through resolution
- Review outcomes for continuous improvement

### *Assurances*

- Documented procedures guide execution
- Governance provides clear accountability
- Metrics track operational performance
- Reviews support continuous improvement
- Communication channels remain defined
- Stakeholders retain approval visibility

## Defect Management

A structured defect management methodology identifies, tracks, resolves, and prevents software defects throughout implementation. Integrated quality assurance, testing, and issue management activities support full functionality and solution quality.

### *Methodology*

- Record defects in a centralized defect tracking system
- Assign a unique identifier to each defect
- Document defect details, expected results, actual results, severity, priority, and affected functionality
- Capture supporting evidence such as screenshots, logs, and test results
- Validate reported defects before assigning them for analysis

### *Assurances*

- All defects receive formal documentation and tracking
- Stakeholders maintain visibility into defect status and resolution progress
- Standardized processes support consistent defect management

## *Defect Analysis and Prioritization*

Defect assessments determine business impact, operational risk, and resolution priority.

### *Severity Levels*

- Critical: System outage, data corruption, security vulnerability, or failure of essential functionality
- High: Significant functional impairment with limited workarounds
- Medium: Partial functionality issues with acceptable workarounds
- Low: Minor defects, display issues, or low-impact usability concerns

### *Methodology*

- Analyze the defect's impact on functionality, performance, security, and usability
- Determine severity and priority levels
- Identify affected business processes and users
- Assess dependencies and release impacts
- Assign resolution targets based on priority

### *Assurances*

- Critical defects receive immediate attention
- Severity assignments follow documented criteria
- Resolution priorities align with business impact and project objectives

## *Defect Resolution*

Assigned technical resources investigate and resolve defects according to established procedures.

### *Methodology*

- Assign defect ownership
- Perform root cause analysis
- Develop and implement corrective actions
- Review code, configuration, or integration changes
- Document resolution activities and outcomes

### *Assurances*

- Clear ownership exists for every defect.
- Resolution activities follow established development standards.
- Teams address root causes rather than symptoms.

## *Testing and Validation*

Testing activities confirm successful defect resolution before deployment.

### *Methodology*

- Perform unit, integration, system, and regression testing as applicable
- Validate corrected functionality against requirements
- Confirm that fixes do not affect existing functionality
- Retest defects after corrective actions
- Obtain stakeholder validation when required

### *Assurances*

- Testing confirms successful defect resolution
- Regression testing protects existing functionality
- Quality controls reduce implementation risk

## *Escalation and Governance*

Formal escalation procedures address unresolved or high-impact defects.

### *Methodology*

- Escalate critical or aging defects to project leadership
- Engage subject matter experts and technical specialists as needed
- Review defect status during project governance meetings
- Monitor resolution timelines and corrective actions
- Document decisions and approvals

### *Assurances*

- Leadership receives visibility into critical defects
- Escalated defects receive appropriate resources and oversight
- Governance processes support timely resolution

## *Reporting and Monitoring*

Continuous monitoring provides visibility into defect trends and quality metrics.

### *Methodology*

- Track open, resolved, and deferred defects
- Monitor defect aging and resolution performance
- Report severity trends and recurring defects
- Review quality metrics throughout implementation
- Identify opportunities for process improvement

### *Assurances*

- Stakeholders receive timely and accurate reporting
- Quality metrics support informed decision-making
- Trending analysis improves overall solution quality

## *Defect Prevention and Continuous Improvement*

Preventive activities reduce future defects and improve implementation outcomes.

### *Methodology*

- Conduct root cause analysis for recurring defects
- Implement preventive and corrective actions
- Update development, testing, and review procedures
- Refine quality assurance practices based on lessons learned
- Incorporate findings into future releases and implementations

### *Assurances*

- Preventive actions reduce defect recurrence
- Continuous improvement strengthens solution quality
- Lessons learned enhance future project performance

## *Integrated Supporting Functions*

Integrated supporting functions coordinate maintenance, operations, support, enhancements, and governance to sustain reliable post-implementation performance

### *Methodology*

- Align support roles and responsibilities
- Coordinate maintenance across support teams
- Route requests through defined channels
- Prioritize issues by operational impact
- Escalate risks through governance pathways
- Track actions through closure
- Review performance for continuous improvement

### *Assurances*

- Roles remain clearly defined
- Support channels remain consistently accessible
- Issues receive timely, appropriate escalation
- Actions remain tracked through closure
- Governance maintains operational alignment
- Performance reviews drive continuous improvement

## Process for Monitoring Initial Operation of Implemented System

Initial operations monitoring confirms system stability, identifies early issues, and supports a smooth transition to ongoing support.

### *Methodology*

- Monitor system health daily
- Track early operational issues
- Review user support trends
- Validate performance against expectations
- Escalate risks through support channels
- Communicate findings to stakeholders
- Confirm readiness for steady-state

### *Assurances*

- Teams maintain increased operational oversight during stabilization
- Monitoring activities identify issues before widespread impact occurs
- Operational readiness remains a priority throughout the stabilization period
- Monitor issue trends and recurring conditions

## Perform and Complete all Aspects of the Successful Implementation into Production

Successful production implementation confirms readiness, completes deployment, and supports a stable operational handoff.

### *Methodology*

- Complete production deployment activities
- Validate system readiness criteria
- Confirm requirements operate correctly
- Resolve implementation issues promptly
- Document deployment outcomes clearly
- Communicate status to stakeholders
- Transition ownership to operations

### *Assurances*

- Deployment activities are fully completed
- Readiness criteria are formally validated
- Requirements perform as approved
- Issues are resolved before handoff
- Outcomes are documented for acceptance
- Stakeholders remain informed
- Operations receive confirmed ownership

## *Final Approval*

Upon full operation, delivered functionality and resolved concerns are reviewed to confirm the system is ready for final acceptance. After successful validation, DHHS provides final approval and authorizes progression to the next phase.

### *Methodology*

- Confirm full system operation
- Validate delivered functionalities
- Review resolved stakeholder concerns
- Document mitigation and closure
- Present results for acceptance
- Obtain formal DHHS approval
- Authorize next project phase

### *Assurances*

- Full operation is confirmed
- Functionality meets approved requirements
- Concerns are fully resolved
- Mitigation actions are documented
- Stakeholder review is completed
- DHHS approval is obtained
- Next-phase readiness is confirmed

## *Transition of System to Production Environment*

The transition to production formally makes the system available for all authorized internal and external users. This milestone confirms operational readiness, validated functionality, and support readiness for official use.

### *Methodology*

- Confirm production readiness criteria
- Prepare production deployment activities
- Migrate system to production

- Validate user access permissions
- Verify production functionality
- Monitor initial system performance
- Announce formal system availability

### *Assurances*

- Production readiness is confirmed
- User access is validated
- Functionality operates as approved
- Deployment risks are mitigated
- Availability is formally communicated
- Support coverage is established
- Operations ownership is confirmed

## On-Site Implementation Assistance During Go-Live Week

On-site implementation assistance during go-live week provides DHHS with hands-on support as the system transitions into full operation. Support resources monitor performance, assist users, resolve issues, document feedback, and escalate major concerns to the appropriate teams. After identified concerns are mitigated or resolved, DHHS provides final approval.

### *Methodology*

- Deploy on-site support resources
- Monitor go-live system performance
- Assist users with navigation
- Resolve issues as identified
- Document feedback and questions
- Escalate major concerns promptly
- Confirm readiness for approval

### *Assurances*

- On-site support remains available
- System performance is actively monitored
- User support is promptly provided
- Issues receive timely resolution
- Major concerns escalate appropriately
- Feedback is documented for improvement
- Approval readiness is confirmed

### *Key Staff On-Site Staffing Support During Go-Live*

Key staff remain on site throughout go-live week to support issue resolution and operational continuity. If substantial unresolved issues affect DHHS business operations, additional on-site assistance is provided at no additional charge.

#### *Methodology*

- Maintain key staff on site
- Monitor unresolved operational issues
- Support DHHS business continuity
- Extend assistance as needed
- Provide additional support resources
- Resolve issues before departure
- Document outcomes and next steps

#### *Assurances*

- Key staff remain on site
- Support continuity is maintained
- Operational issues receive focused attention
- Additional assistance is provided
- Unresolved issues are addressed
- DHHS business needs are supported
- No additional charges apply

## Acceptance from the State

Implementation results are presented to DHHS for review, feedback, and approval. After concerns are mitigated or resolved, DHHS provides final approval to proceed.

#### *Methodology*

- Present implementation results to DHHS
- Demonstrate achieved project benefits
- Gather stakeholder feedback and questions
- Address concerns through resolution
- Document mitigation actions completed
- Confirm readiness for approval
- Obtain formal DHHS acceptance

#### *Assurances*

- Results are clearly presented
- Benefits are demonstrated effectively
- Feedback is reviewed with DHHS

- Questions receive timely responses
- Concerns are mitigated or resolved
- Approval readiness is confirmed
- Formal DHHS acceptance is obtained

## Additional Information - Change Order Process Due to State and federal Statutes and Associated Pricing

State and Federal requirements may require change orders for modifications outside current system capabilities. The vendor responds through the approved change order process, with pricing based on applicable optional services or hourly rates.

### *Methodology*

- Identify statutory change requirements
- Confirm system capability impacts
- Initiate DHHS change orders
- Follow approved change processes
- Estimate pricing using cost schedules
- Implement prescribed modifications promptly
- Support compliance without disruption

### *Assurances*

- Statutory requirements are reviewed promptly
- System impacts are clearly assessed
- Change orders follow approved processes
- Pricing aligns with cost schedules
- Modifications support timely compliance
- Service disruption risks are minimized
- DHHS requests receive responsive support

We reference pricing related to Change Order Requests in Part III – Optional Services Miscellaneous Support and Enhancements and/or referenced Hourly Rates per title/role on the Cost Sheet.

## VI.A.2.II.d.9 Post-Implementation Narrative [RFP V.D.10]

**REQUIREMENT: RFP Section V.D.10**
Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly. Include a detailed approach to each of the following as it relates to Maintenance, Operations and Support.
For sections a. through d. DHHS will review and approve, with the designated State stakeholder providing final sign-off. Detail items a. through d. of the following as it relates to Post-Implementation:

- System maintenance.
- The proposed evolution, planned releases, and on-going development philosophy of core products and software tools in your proposed system.
- How system improvements, change requests, and bug fixes are prioritized. Also include details as to how DHHS's projects are

prioritized amongst other client requests.

- Response times for all levels of support, escalation process of support, support tracking system, and support severity level determinations;
- What support options are available (e.g., phone, chat, support ticket, etc.)

a. Coordinate and Facilitate a Post-Implementation Review Teleconference Meeting

Meeting should focus on evaluation of project objectives being met, efficiency of project management, documentation of lessons learned and troubleshooting for future guidance. Meeting should be scheduled within two (2) weeks following the acceptance of the Warranty Period.

b. Provide a Plan for Enhancement Requests

For DHHS change requests that are not federally required, and qualify as enhancements rather than defects, provide a plan to address expected timelines, cost estimates and pricing.

c. Provide a Transition Plan from Implementation to Maintenance, Operations and Support

Plan must outline steps and activities for transitioning from system implementation to Maintenance, Operations and Support. Plan must define transition goals, transition activities, identify support resources, assign support responsibilities, and identify support communication channels. Plan must designate an account manager, responsible for business specifications/requirements being fulfilled and serve as point of contact for escalations, questions and support.

d. Final Sign-Off

Once all objectives have been met satisfactorily, prepare final sign-off documents, to include, at a minimum: project summary, list of deliverables, acceptance criteria, statement of satisfaction, and signature fields for stakeholders. Present post-implementation results, address any concerns or questions raised by the State, and gain State's formal approval to proceed with the project's next phase.

Final sign-off documents must be prepared and provided to the State for review. All concerns must be mitigated and resolved and be properly documented by the vendor. Once complete, the designated State of Nebraska stakeholders will provide final sign-off approval of the system.

***A structured post-implementation framework maintains system stability, supports continuous improvement, and delivers responsive support throughout the solution lifecycle.***

## Post-Implementation Maintenance, Operations, and Support Approach

Conduent's post-implementation methodology provides Nebraska DHHS with structured maintenance, responsive support, transparent governance, and continuous improvement activities that sustain long-term Medicaid Drug Rebate (MDR) operations. Through integrated maintenance, operations, support, and enhancement management processes, Conduent helps maintain system stability, security, performance, and operational continuity throughout the solution lifecycle. This approach gives DHHS a stable and secure MDR solution, supported by experienced operations and governance resources.

**Conduent Offers**

- Proactive maintenance, monitoring, and security practices
- Transparent governance for enhancements, change requests, and bug fixes
- Defined service levels, escalation paths, and support channels
- Roadmap-driven releases and continuous improvement

### *System Maintenance*

Conduent employs a proactive maintenance strategy that supports system stability, security, availability, and business continuity.

### *Methodology*

- Monitor system health, availability, capacity, and performance
- Perform preventive maintenance and system optimization
- Apply vendor patches, updates, and security fixes
- Verify backup verification and recovery testing
- Review security controls and user access
- Maintain current operational documentation
- Track maintenance activities and performance metrics

These activities support reliable MDR operations, business continuity, and ongoing regulatory compliance.

### *Assurances*

- Preventive maintenance supports reliable operations
- Monitoring identifies issues before service disruptions occur
- Security reviews protect system integrity
- Recovery testing supports business continuity

## *Product Evolution, Planned Releases, and Development Philosophy*

Conduent uses a product roadmap to guide improvements, security updates, and long-term system planning.

### *Methodology*

- Evaluate customer feedback and enhancement requests
- Monitor regulatory requirements and industry trends
- Maintain a documented product roadmap
- Prioritize enhancements based on business value and user demand
- Deliver functionality through planned release cycles
- Conduct testing before deployment
- Communicate release schedules, impacts, and new functionality

### *Assurances*

- Planned releases align with business needs
- Testing validates functionality before deployment
- Product roadmaps provide visibility into future enhancements

## Planned Releases

### Methodology

- Define release scope and objectives
- Prioritize features for each release
- Establish release schedules and milestones
- Validate readiness through testing activities
- Coordinate deployment across stakeholders
- Communicate release plans and impacts
- Review outcomes and lessons learned

### Assurances

- Releases planned through defined governance
- Scope approved before release execution
- Testing completed prior to deployment
- Release schedules communicated proactively
- Risks assessed and mitigated
- Stakeholder readiness confirmed in advance
- Post-release validation successfully completed

## Development Philosophy

- Customer-driven innovation
- Security-by-design
- Iterative development and continuous improvement
- Standards-based architecture
- Continuous quality assurance
- Performance and scalability optimization
- Development activities support long-term system sustainability

### Methodology

- Adopt iterative and incremental delivery
- Align development with business objectives
- Emphasize quality throughout development
- Incorporate stakeholder feedback regularly
- Prioritize value-driven solution development
- Promote collaboration across teams
- Continuously improve processes and practices

### *Assurances*

- Consistent development standards are followed
- Quality built into every phase
- Stakeholder needs guide development decisions
- Continuous improvement drives team practices
- Collaboration strengthens solution outcomes
- Value-focused delivery remains prioritized
- Proven methodologies support reliable results

## *Prioritization of Improvements, Change Requests, and Bug Fixes*

Conduent uses a structured governance process to evaluate, prioritize, and manage enhancements, change requests, and defect resolution activities.

### *Prioritization of Improvements Methodology*

- Business value and operational impact
- Regulatory and compliance requirements
- Security and privacy considerations
- User impact and service disruption risk
- Technical complexity and dependencies
- Alignment with DHHS priorities and strategic objectives

### *Assurances*

- Clear criteria drive objective decisions
- Transparent prioritization process and rationale
- Stakeholder alignment and decision traceability
- Risk, value, and effort balanced
- Consistent evaluation across improvement opportunities
- Regular governance reviews ensure relevance
- Documented assumptions support accountability and confidence

### *Prioritization of Change Requests Methodology*

- Business value and impact
- Regulatory and compliance needs
- Security and privacy risks
- User and service disruption
- Technical complexity and dependencies
- DHHS priorities and milestones

### *Assurances*

- Defined criteria guide request prioritization
- Transparent decisions with documented rationale
- Business value drives ranking outcomes
- Stakeholder input informs final priorities
- Dependencies and risks consistently evaluated
- Governance oversight ensures fair assessment
- Regular reviews maintain priority alignment

### *Bug Fix Prioritization Methodology*

- Critical: System outage, security vulnerability, or data integrity issue
- High: Significant functionality impairment with limited workaround
- Medium: Moderate operational impact with available workaround
- Low: Minor defect or cosmetic issue
- Critical issues receive immediate attention and expedited resolution

### *Assurances*

- Severity and business impact determine priority
- Critical defects addressed with urgency
- Consistent triage criteria applied universally
- Root cause analysis guides resolution
- Stakeholders informed of prioritization decisions
- Service levels drive response expectations
- Regular review of bug backlog priorities

### *DHHS Project Prioritization Methodology*

DHHS initiatives receive dedicated governance oversight and prioritization review.

- Contractual commitments and service levels
- Operational impact on DHHS programs
- Regulatory deadlines
- Security and privacy risks
- Approved project milestones
- Business criticality
- Stakeholder priorities

### *Assurances*

- DHHS priorities aligned to mission objectives
- Funding, compliance, and impact considered
- Transparent criteria support project selection
- Stakeholder input informs prioritization decisions

- Risks and dependencies evaluated consistently
- Governance reviews validate priority rankings
- Regular reassessment ensures ongoing alignment

## *Support Response Times, Escalation Process, Tracking System, and Severity Levels*

The support model helps resolve issues on time, clarify ownership, and show service performance.

### *Response Times*

- Severity 1 (Critical): Response within 1 hour
- Severity 2 (High): Response within 4 business hours
- Severity 3 (Medium): Response within 1 business day
- Severity 4 (Low): Response within 2 business days

### *Methodology*

- Define response targets by priority
- Classify tickets using severity criteria
- Route requests through standardized workflows
- Monitor performance against service commitments
- Escalate unresolved issues per guidelines
- Analyze trends to optimize response times
- Review metrics and adjust processes regularly

### *Assurances*

- Defined SLAs establish response expectations
- Priority levels drive response commitments
- Continuous monitoring ensures SLA compliance
- Escalation processes address urgent issues
- Performance metrics tracked and reported
- Adequate staffing supports timely responses
- Regular reviews improve response effectiveness

## *Escalation Process*

- Tier 1 logs requests and resolves routine issues
- Tier 2 addresses complex functional and technical issues
- Tier 3 resolves software defects and advanced technical issues
- Management oversees critical issue escalation and resolution

### *Methodology*

- Define escalation triggers and thresholds
- Categorize issues by severity levels
- Route escalations through defined tiers
- Assign ownership at each stage
- Communicate status throughout escalation lifecycle
- Track escalation metrics and outcomes
- Review processes for continuous improvement

### *Assurances*

- Clearly defined escalation paths established
- Timely escalation of critical issues
- Ownership maintained throughout resolution process
- Stakeholders notified at key milestones
- Escalation thresholds consistently applied
- Management oversight supports rapid resolution
- Escalation outcomes tracked and reviewed

## *Tracking System*

A centralized support system provides:

- Ticket creation and tracking
- Request categorization and prioritization
- Workflow and status management
- Escalation tracking
- Resolution documentation
- Audit history
- Performance reporting

### *Methodology*

- Capture requests in centralized system
- Categorize and prioritize tracked items
- Assign ownership and accountability clearly
- Update status throughout lifecycle stages
- Monitor progress against defined milestones
- Generate reports and performance metrics
- Review data for continuous improvement

### *Assurances*

- Centralized system records all activities
- Real-time visibility into request status
- Comprehensive audit trails maintained consistently
- Accurate data supports informed decisions
- Reporting capabilities track performance trends
- Secure access controls protect information
- Regular reviews ensure data integrity

## *Severity Determination*

### *Methodology*

- Define severity classification criteria clearly
- Assess business impact and urgency
- Evaluate affected users and services
- Consider operational and compliance risks
- Apply standardized severity rating framework
- Validate severity through triage review
- Reassess severity as conditions change

### *Assurances*

- Consistent criteria applied across incidents
- Business impact accurately reflects severity
- Documented framework guides classification decisions
- Triage reviews validate assigned severities
- Severity assessments regularly reviewed, updated
- Stakeholders informed of severity rationale
- Governance oversight ensures classification consistency

## *Support Options*

Multiple support channels provide timely access to functional, technical, and operational assistance. All support requests enter a centralized tracking system regardless of submission method.

- Support ticket portal
- Email support
- Telephone support
- Web-based support portal
- Virtual support sessions
- Scheduled operational review meetings
- Knowledge base and self-service resources

### *Methodology*

- Define available support channels clearly
- Route requests through appropriate channels
- Provide self-service and knowledge resources
- Offer tiered support-based needs
- Establish coverage hours and availability
- Communicate support options to users
- Review channel effectiveness regularly

### *Assurances*

- Maintenance, support, and enhancement activities follow documented procedures
- Governance processes provide transparency and accountability
- Continuous improvement activities support long-term operational success
- Designated State stakeholders review outcomes and provide final sign-off as required

## *Coordinate and Facilitate a Post-Implementation Review Teleconference Meeting*

Conduent coordinates and facilitates a Post-Implementation Review Teleconference Meeting within two (2) weeks following acceptance of the Warranty Period. The review evaluates implementation outcomes, project management effectiveness, operational readiness, lessons learned, and opportunities for improvement.

### *Methodology*

- Schedule and coordinate the review meeting and participants
- Present implementation results and operational performance metrics
- Evaluate achievement of project objectives and success criteria
- Assess governance, communication, and project management effectiveness
- Review user adoption, operational readiness, and support performance
- Document lessons learned, best practices, and recommendations
- Establish ownership and target dates for follow-up actions

### *Assurances*

- Structured review meeting successfully facilitated
- Key stakeholders invited and engaged
- Implementation outcomes thoroughly evaluated
- Lessons learned clearly documented
- Action items assigned and tracked
- Open issues identified and discussed
- Follow-up communications distributed promptly

DHHS receives documented findings, recommendations, lessons learned, and action items that support future project planning and operational success.

## Enhancement Request Plan

Conduent uses a structured process to review, approve, build, test, and deploy DHHS enhancement requests.

Non-federally mandated enhancement requests that are not defects follow a documented governance and approval process.

This process gives DHHS visibility into scope, cost, schedule, and implementation considerations before work begins.

### Methodology

- Document enhancement requests within the support tracking system
- Review business objectives, expected benefits, and operational impacts
- Review the request for technical, functional, security, and compliance impacts
- Evaluate dependencies, risks, and implementation requirements
- Develop scope, effort, schedule, and resource estimates
- Provide cost estimates before development begins
- Present recommendations through governance processes
- Prioritize approved enhancements within the product backlog
- Schedule enhancements through planned releases
- Test enhancements before deployment
- Update documentation, training materials, and support resources as needed

### Assurances

- Enhancement requests follow a documented governance and approval process
- DHHS receives cost, schedule, and resource estimates before enhancement work begins
- Approved enhancements are prioritized through established release management processes
- Enhancement status remains visible through the support tracking system
- Documentation, training materials, and support resources are updated as appropriate

## Expected Timelines for Enhancement Requests

- Request acknowledgement within one business day
- Initial assessment within five business days
- Cost estimate and implementation recommendation within ten business days
- Release scheduling following DHHS approval

### Methodology

- Define enhancement scope and requirements
- Estimate effort and resource needs
- Prioritize enhancements by business value

- Establish realistic delivery milestones
- Track progress against planned timelines
- Communicate schedule updates proactively
- Review timelines and adjust accordingly

### *Assurances*

- Realistic timelines established and communicated
- Estimates based on proven methodology
- Milestones tracked throughout delivery
- Progress updates provided regularly
- Risks evaluated and managed proactively
- Schedule adjustments communicated promptly
- Delivery commitments closely monitored

## *Cost Estimates and Pricing for Enhancement Requests*

For each enhancement request, DHHS receives:

- Scope summary
- Business and technical assumptions
- Resource requirements
- Labor estimates by role
- Schedule estimates
- Total estimated costs

Pricing is based on approved contract pricing schedules, enhancement service rates, and applicable labor categories.

Enhancement work does not begin without DHHS review and approval.

### *Methodology*

- Define enhancement scope and objectives
- Estimate effort and resource requirements
- Prioritize enhancements by business value
- Develop implementation schedules and milestones
- Track progress against planned dates
- Manage dependencies and delivery risks
- Review timelines and adjust plans

### *Assurances*

- Timelines developed using defined estimates
- Delivery dates communicated upfront
- Milestones monitored for schedule adherence

- Progress reported through regular updates
- Risks managed to minimize delays
- Changes assessed for timeline impacts
- Delivery commitments actively tracked

## Transition Plan from Implementation to Maintenance, Operations, and Support

Conduent uses a structured transition process to support operations, knowledge transfer, and long-term system use.

### *Transition Goals*

- Establish stable production operations
- Transfer system knowledge to support personnel
- Define support roles and responsibilities
- Establish communication and escalation procedures
- Confirm maintenance and support readiness
- Enable continuous improvement activities

### *Transition Activities*

- Develop a formal Transition Plan and schedule
- Conduct operational readiness assessments
- Complete knowledge transfer sessions
- Deliver operational and technical documentation
- Validate support processes and escalation procedures
- Establish monitoring and maintenance processes
- Confirm backup, recovery, and security procedures
- Transition open issues and enhancement requests
- Conduct operational reviews
- Complete stabilization and readiness checkpoints

### *Support Resources and Responsibilities*

Dedicated operations, technical, and management resources support the move from implementation to ongoing maintenance and support.

Support resources include:

- Account Manager
- Service Delivery Manager
- Technical Support Resources
- Application Support Specialists
- System Administrators
- Product Development Resources
- Escalation Management Personnel

### *Account Manager*

A designated Account Manager serves as the primary business contact for DHHS and:

- Fulfills business requirements
- Coordinates service delivery
- Facilitates governance reviews
- Serves as the primary escalation contact
- Coordinates service issue resolution
- Supports future enhancement planning

### *Support Communication Channels*

- Support ticket portal
- Email support
- Telephone support
- Web-based support portal
- Virtual meetings
- Scheduled operational review meetings
- Knowledge base and self-service resources

#### *Methodology*

- Define transition roles and responsibilities
- Develop operational readiness criteria
- Transfer knowledge to support teams
- Complete documentation and handoff activities
- Validate support processes and procedures
- Establish ongoing monitoring and governance
- Confirm maintenance and support readiness

#### *Assurances*

- Formal handoff process completed
- Support teams fully prepared
- Operational readiness criteria validated
- Knowledge transfer successfully conducted
- Documentation delivered and maintained
- Support coverage established before transition
- Ongoing ownership clearly defined

## Transition of Maintenance, Operations, and Support Functions

The Transition Plan incorporates the maintenance, release, enhancement, support, escalation, communication, and operational processes described previously.

Rather than establishing separate post-transition processes, Conduent transitions proven operational procedures that have already been implemented and validated during implementation and stabilization activities.

These activities provide DHHS personnel with the knowledge, tools, documentation, and operational understanding necessary to support the MDR solution following implementation.

### *Methodology*

- Assess current support capabilities
- Define transition scope and objectives
- Transfer responsibilities through phased approach
- Conduct knowledge transfer sessions
- Update operational procedures and documentation
- Validate support readiness and coverage
- Monitor transition milestones and outcomes

### *Assurances*

- Responsibilities transitioned with defined ownership
- Knowledge transfer completed successfully
- Support procedures fully documented
- Operational readiness validated before transition
- Service continuity maintained throughout transition
- Support resources prepared and trained
- Governance oversight ensures smooth transition

## Final Sign-Off

The final sign-off process confirms project completion, validates delivered functionality, resolves open concerns, and supports formal State acceptance.

- Final sign-off documents provide complete project documentation
- All concerns receive resolution and documentation before approval
- Stakeholders receive visibility into project outcomes and support readiness
- Maintenance and support processes remain operational following acceptance
- Designated State stakeholders provide final sign-off upon satisfactory completion of all requirements

### *Final Sign-Off Documentation*

Conduent prepares and submits:

- Project summary
- List of completed deliverables
- Acceptance criteria results

- Summary of delivered functionality
- Testing and validation results
- Operational readiness confirmation
- Statement of stakeholder satisfaction
- Documentation of resolved concerns
- Signature fields for designated stakeholders

## *Presentation of Results*

Conduent:

- Presents implementation results and performance metrics
- Demonstrates delivered functionality and business outcomes
- Reviews project objectives and operational readiness
- Presents support and stabilization results
- Addresses stakeholder questions and concerns

## *Concerns Management and Resolution*

All concerns are formally documented, tracked, evaluated, and resolved prior to final acceptance.

- Document concerns
- Assess impacts and root causes
- Develop corrective action plans
- Implement approved resolutions
- Validate corrective actions with stakeholders
- Document closure status and outcomes

## *Final Approval*

Following resolution and documentation of identified concerns, designated State stakeholders conduct a final review and acceptance assessment.

This approach supports formal acceptance, confirms operational readiness, and transitions the project to ongoing maintenance, operations, and support.

### *Methodology*

- Define final acceptance criteria
- Validate deliverables against requirements
- Review outcomes with stakeholders
- Resolve outstanding issues and actions
- Obtain formal approval documentation
- Complete sign-off records and artifacts
- Confirm transition and project closure

### *Assurances*

- Formal acceptance criteria verified
- Stakeholder approvals successfully obtained
- Deliverables meet agreed requirements
- Outstanding issues appropriately resolved
- Sign-off documentation fully completed
- Project objectives formally confirmed
- Closure approvals recorded and maintained

## VI.A.2.II.d.10 Maintenance, Operations and Support Narrative [RFP V.D.11]

**REQUIREMENT: RFP Section V.D.11**

Following a successful warranty period and sign-off, the project will immediately transition into the Maintenance, Operations, and Support phase. Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

***Conduent provides DHHS structured maintenance, operational support, governance, security oversight, continuous improvement, and Help Desk services that sustain reliable Medicaid drug rebate operations throughout the contract lifecycle.***

**Proven Medicaid Rebate Operations**

- 27 years supporting Medicaid drug rebate administration
- Mature CMdS Rebate Administration platform designed specifically for Medicaid rebate operations
- Dedicated rebate operations, accounting, and dispute resolution specialists

Following warranty acceptance and DHHS approval of system readiness, the MDR solution transitions into Maintenance, Operations, and Support (M&O). During this phase, we provide operational, technical, security, governance, and user support services that sustain daily operations.

Following warranty acceptance and DHHS approval of system readiness, the MDR solution transitions into Maintenance, Operations, and Support (M&O). During this phase, we provide operational, technical, security, governance, and user support services that sustain daily operations. This approach gives DHHS a single point of accountability for system performance and operational support.

We maintain disciplined operational processes that support system stability, regulatory compliance, user satisfaction, and continuous improvement. Experienced rebate operations, accounting, collections, dispute resolution, and support resources help DHHS sustain efficient and compliant rebate administration.

Through disciplined governance, experienced operational resources, and proven support processes, we help the State maintain operational continuity, reduce risk, and sustain a transparent and effective MDR Program. Figure VI.A.2.II.d.10-1 details our maintenance and operations support model.




**Figure VI.A.2.II.d.10-1. Conduent's Maintenance, Operations and Support Model**
*Our Medicaid experience, mature platform, and proven operations support successful maintenance and operations for the MDR system.*

## A. System Upgrades, and Release Management

We follow a controlled maintenance and release management process that supports system stability, compliance, and operational continuity. All software upgrades, patches, releases, and enhancements are deployed and validated within non-production environments before production implementation.

Before promoting an update into production, we test integrations, business processes, security controls, and application performance. Production deployment occurs only after testing confirms that no unresolved critical defects remain and DHHS has approved the release.

## B. Critical Issue Resolution

We follow a structured incident management process to address technical, operational, and business issues. Support requests are classified based on severity, business impact, and urgency.

For issues designated as critical by DHHS, we initiate incident response procedures immediately and engage the appropriate technical and operational resources. Support teams investigate the issue, identify root causes, implement corrective actions, and communicate progress until resolution is complete.

Following resolution of major incidents, we conduct root-cause analysis and incorporate lessons learned into future procedures and releases.

Figure VI.A.2.II.d.10-2 illustrates our overarching incident management process.

[redacted]

**Figure VI.A.2.II.d.10-2. [redacted]**

## C. Scheduled Maintenance Activities

We work with DHHS to establish a recurring maintenance calendar. Scheduled maintenance activities occur outside normal business hours and are coordinated to minimize disruption to users and business operations.

Maintenance schedules are communicated in advance and incorporated into ongoing operational planning activities.

## D. User Feedback and Continuous Improvement

We establish multiple channels for collecting and reviewing user feedback. Input is gathered through support interactions, governance meetings, enhancement requests, operational reviews, user discussions, and satisfaction surveys.

We analyze recurring issues, operational trends, and user feedback to improve workflows, reports, automation, usability, and operational efficiency, as shown in Figure VI.A.2.II.d.10-3.

This continuous improvement model helps DHHS address user pain points, improve user experience, and maximize the value of its MDR investment throughout the contract term.

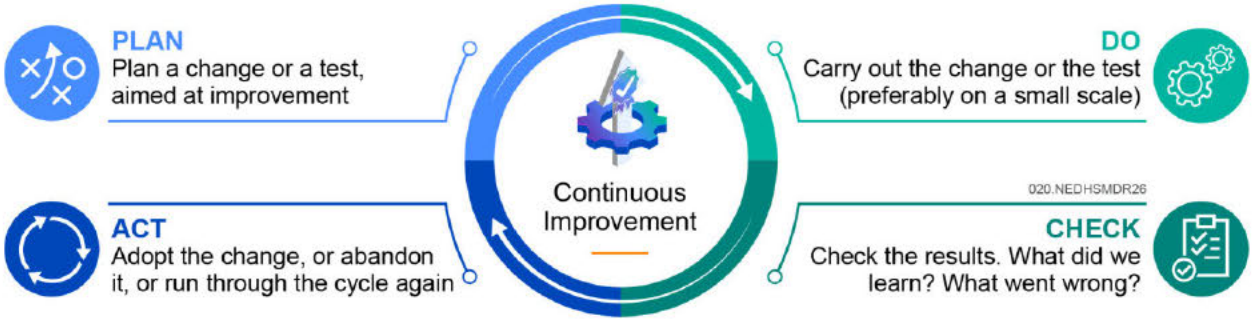



**Figure VI.A.2.II.d.10-3. Continuous Process Improvement (CPI) Using the Deming Circle**
*We use a Plan-Do-Check-Act Cycle to promote CPI throughout the contract lifecycle.*

## E. System Availability Notifications

Prior to planned maintenance activities, we provide notification that includes maintenance schedules, expected availability impacts, planned activities, and anticipated completion times.

If an unplanned outage or service interruption occurs, we follow established communication procedures and provide timely status updates, resolution information, and service restoration notifications.

## F. Defect Management and System Improvements

DHHS users have a formal process for submitting defects, enhancement requests, and system improvement recommendations. We review, prioritize, and track each request through established operational processes.

Approved improvements are incorporated into the enhancement roadmap and follow established planning, testing, validation, and deployment procedures prior to implementation.

## G. Change Management and Change Control Board

We maintain a formal change management process governing modifications to requirements, configurations, workflows, interfaces, reports, and operational processes.

At the start of M&O operations, we work with DHHS and establish a Change Control Board (CCB) to review, evaluate, prioritize, and approve change requests. Requests may originate from DHHS users, operational staff, support activities, regulatory changes, or continuous improvement initiatives.

Each proposed change undergoes impact analysis that evaluates business benefits, operational implications, effort, schedule impacts, dependencies, costs, and risks. Approved changes follow established development, testing, and deployment processes before implementation.

## H. Account Management and Service Oversight

We assign a dedicated Account Manager who serves as the State’s primary point of contact throughout the contract term. The Account Manager oversees service delivery, contract compliance, stakeholder engagement, operational performance, and issue escalation.

The Account Manager works closely with DHHS leadership to support business objectives and serves as the primary escalation point for support and operational matters.

## I. Training Materials and Knowledge Resources

We maintain training materials, job aids, reference guides, process documentation, and support resources within an online repository accessible to authorized users.

We review and update training content regularly to reflect enhancements, configuration changes, revised processes, and new capabilities. This approach provides users with current and consistent information throughout the life of the contract.

## J. Annual Independent Penetration Testing

We engage an independent third party each year to conduct a penetration test of the MDR solution. Testing includes assessment of OWASP Top 10 vulnerabilities and associated security risks.

We submit test results and remediation status information to the designated DHHS representative following completion of testing activities.

## K. Annual Disaster Recovery Testing

We conduct an annual disaster recovery exercise to validate recovery procedures, business continuity capabilities, and operational readiness.

Results, observations, corrective actions, and improvement recommendations are documented and provided to DHHS for review.

## L. Annual NIST SP 800-53 Security Assessment

We obtain an annual independent security controls assessment aligned with NIST SP 800-53 Moderate requirements. Assessment findings and remediation activities are shared with DHHS in accordance with contract requirements.

These assessments provide visibility into the effectiveness of security controls and support ongoing compliance activities.

## M. Deliverable and Performance Monitoring

We implement a governance framework that provides visibility into operational performance, support activities, risks, outstanding issues, contract deliverables, and service levels.

Monthly reviews, performance reports, and governance meetings provide structured communication and accountability throughout the contract period.

We monitor and report on all deliverables, service commitments, project obligations, and applicable performance standards established during the DDI and M&O phases. DHHS and Conduent review operational metrics, issue trends, and service results to support informed decision-making.

## N. Help Desk and User Support Services

We provide comprehensive Help Desk services during normal DHHS business hours. Support staff receive, document, track, and manage user requests from initial contact through resolution.

We structure support services through a multi-tier model that resolves issues efficiently and directs technical resources where they add the most value.

### *Multi-Level Support Model*

**Level 0 Support** provides self-service access to training materials, FAQs, user guides, job aids, and online documentation.

**Level 1 Support** serves as the first point of contact for users. Representatives log, classify, and resolve routine issues whenever possible. When appropriate, Level 1 Support escalates issues to DHHS and higher support tiers according to established procedures.

**Level 2 Support** provides advanced assistance for reporting, workflows, configuration questions, and business-process issues.

**Level 3 Support** provides technical troubleshooting for software issues, interfaces, integrations, infrastructure, data exchanges, and application defects.

We track issues through resolution and communicate with users throughout the support process. Our support model promotes timely resolution, operational transparency, and positive user experience.

### *Critical Support Coverage*

We support critical system failures and high-priority issues Monday through Friday from 7:00 AM to 6:00 PM Central Time during DHHS business days.

### *Help Desk Transitioning Training*

If DHHS elects to assume Help Desk responsibilities, we provide structured training before support transition activities begin. Training covers issue management, escalation procedures, troubleshooting practices, support documentation, and operational administration.

## Operational Rebate Administration Services

We provide day-to-day support for invoice production, collections, dispute resolution, payment allocation, manufacturer communications, accounts receivable management, and reporting.

Operational specialists manage federal, supplemental, managed care, and state-specific rebate programs within a unified operating environment. The CMdS Rebate Administration solution provides visibility into invoices, payments, disputes, collections activity, and accounts receivable balances.

Our rebate operations team supports invoice production, collections, disputes, payment allocation, and accounts receivable management. Our operational experience helps maximize rebate collections and supports timely manufacturer engagement. We never keep any of the money we collect. We turn over 100% to you. These results reflect our combination of mature technology, disciplined operational processes, and experienced Medicaid rebate professionals, as detailed in Figure VI.A.2.II.d.10-4.

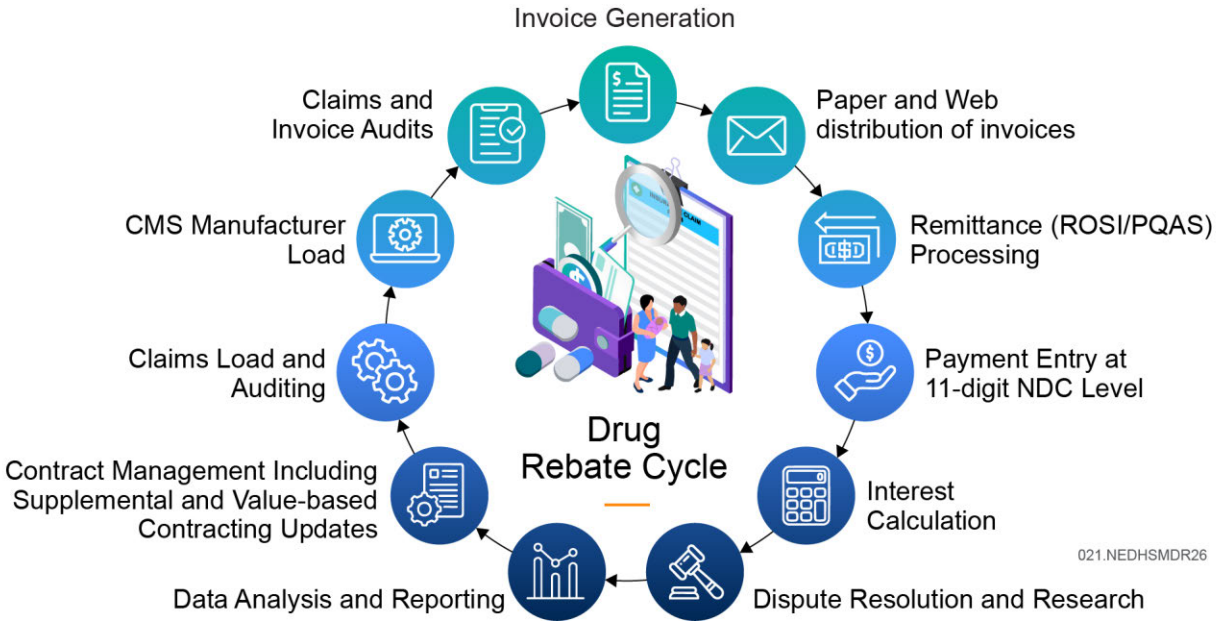



**Figure VI.A.2.II.d.10-4. End-to-End Rebate Operations Lifecycle**
*CMdS supports the complete rebate lifecycle, from claims processing and invoicing through collections, dispute resolution, and reporting.*

## Deliverables and Outcomes

We provide the following M&O deliverables to support system performance, operational oversight, regulatory compliance, and program administration:

- Performance reports
- Service-level reports
- Maintenance schedules
- Release documentation
- Change control artifacts
- Help desk metrics
- Penetration testing reports
- Disaster recovery test results
- Nist assessment reports
- Training materials
- Knowledge transfer documentation
- Continuous improvement recommendations

Through this integrated M&O model, DHHS receives the operational support, governance, security oversight, training, and continuous improvement activities needed to sustain Medicaid drug rebate operations.

## VI.A.2.II.d.11 Turnover Phase Narrative [RFP V.D.12]

**REQUIREMENT: RFP Section V.D.12**

Describe and include specific information regarding your methodology to accomplish each task listed. Note: If other tasks and/or functions are necessary to accomplish the requirement and achieve full functionality, vendor must integrate such tasks into their solution to be performed accordingly.

***Conduent's Turnover Phase methodology provides a seamless, secure, and fully documented transition of the Nebraska Medicaid Drug Rebate (MDR) System, associated services, knowledge, and operational responsibilities to DHHS and/or a successor vendor.***

### Conduent's Turnover Methodology

Conduent's Turnover Phase methodology provides Nebraska DHHS with a structured, low-risk approach for transitioning the Medicaid Drug Rebate (MDR) System, associated services, operational knowledge, and support responsibilities to DHHS and/or a successor contractor. We recognize that Nebraska's MDR program supports critical rebate invoicing, dispute resolution, collections, financial reconciliation, manufacturer communications, regulatory reporting, and CMS compliance activities. Our turnover methodology preserves continuity of these functions while equipping DHHS with the knowledge, assets, documentation, and operational readiness needed to successfully assume or transfer responsibility for ongoing operations.

**Turnover Without Disruption**

- Maintains continuity of critical MDR operations
- Preserves institutional knowledge through structured knowledge transfer
- Provides access to Nebraska-owned data, assets, and CMS certification artifacts
- Enables DHHS or a successor vendor to assume responsibilities confidently

Consistent with RFP Section V.D.12,Turnover Phase, our approach incorporates all tasks necessary to achieve full operational readiness, knowledge transfer, maintenance transition, and continuity of MDR operations. Because turnover readiness begins long before contract expiration, Conduent maintains documentation, operational knowledge, and transition assets throughout the contract lifecycle to support a successful future transition.

Throughout the contract lifecycle, Conduent prepares for turnover by maintaining current documentation, preserving institutional knowledge, and organizing operational assets required for a successful transition. Nebraska retains ownership of its data, documentation, reports, configuration information, and contract deliverables throughout the contract term. The turnover process includes the transfer of Nebraska-owned data, documentation, configuration information, operational procedures, support processes, and CMS certification artifacts required to support future operations and compliance activities. Figure VI.A.2.II.d.11-1 illustrates how Conduent's proactive approach promotes continuity, confidence, and operational readiness throughout the transition process.




**Figure VI.A.2.II.d.11-1. Benefits of Conduent's Turnover Approach**
*Conduent's turnover approach promotes continuity, confidence, and a smooth transition of MDR operations.*

## *A Smooth Turnover Phase*

Our turnover approach:

- Promotes a smooth, low-risk transition with minimal disruption to MDR operations
- Preserves institutional knowledge through structured knowledge transfer and comprehensive documentation
- Provides full access to Nebraska-owned data, system assets, and CMS certification artifacts
- Transfers operational and technical expertise to DHHS and/or a successor vendor
- Maintains continuity of critical rebate operations throughout the transition period
- Enables DHHS or a successor contractor to assume responsibilities efficiently and confidently

## *Hosting Agreement Assignment*

If requested by DHHS, Conduent supports the transition or assignment of hosting-related services, operational responsibilities, and associated documentation in accordance with applicable contractual, licensing, and vendor requirements. We provide complete visibility into hosting configurations, service dependencies, architecture, operational procedures, and support processes to facilitate a smooth transfer of responsibilities.

This approach minimizes transition risk while promoting continuity of service and operational stability throughout the turnover period.

## *Implementation on DHHS Infrastructure*

Should DHHS elect to host the MDR solution within a State-managed environment, Conduent supports the transition of the application and associated operational components to DHHS infrastructure. Activities include environment documentation, deployment procedures, configuration baselines, infrastructure validation, security verification, operational readiness reviews, and technical knowledge transfer.

We work collaboratively with DHHS technical personnel to validate that the environment can support system administration, maintenance activities, reporting, security management, and future enhancements following turnover.

## *180-Day Transition Requirement*

Consistent with the Turnover Phase requirements, Conduent supports a structured transition period beginning up to 180 days prior to contract expiration, or as otherwise directed by DHHS. During this period, we manage all turnover activities through an approved Turnover and Knowledge Transfer Plan.

The plan governs transition planning and governance activities, knowledge transfer sessions, documentation delivery and review, infrastructure transition activities, operational readiness assessments, data and repository transfer, risk management, issue resolution, and executive reporting. Regular checkpoints provide DHHS with complete visibility into turnover readiness, transition status, identified risks, and mitigation activities.

## *12-Month Transition and Training Period*

Successful turnover requires more than end-of-contract transition activities. Throughout the final year of the contract, Conduent executes a phased transition approach that progressively transfers operational knowledge, documentation, and support responsibilities to DHHS and/or a successor contractor. This approach reduces transition risk, promotes workforce readiness, and allows turnover activities to be validated over time rather than concentrated at the end of the contract. Transition activities are aligned to defined milestones, readiness reviews, knowledge transfer schedules, and operational handoff checkpoints to support a smooth and orderly transition.

## *Roadmap with Time Estimates*

Conduent develops and maintains a detailed Turnover Roadmap that establishes the activities, milestones, responsibilities, dependencies, and estimated timelines required to complete transition activities.

The roadmap identifies key transition milestones, knowledge transfer schedules, documentation delivery dates, operational readiness reviews, infrastructure transition activities, stakeholder review points, data transfer activities, and final acceptance milestones. This roadmap provides DHHS with a transparent framework for monitoring progress and validating readiness throughout the turnover period.

## *Future Licensing and Support Model*

As part of turnover planning, Conduent provides DHHS with documentation describing the future operational, licensing, maintenance, and support model for the MDR solution. DHHS receives information regarding software components, third-party products, support requirements, maintenance responsibilities, and operational dependencies necessary to sustain the solution after turnover.

Where applicable, Conduent collaborates with DHHS to support continuity of vendor relationships, maintenance arrangements, and support processes required for ongoing MDR operations.

## *License Inventory and Payment Frequency*

To support future planning and budgeting activities, Conduent provides a comprehensive inventory of software licenses, subscriptions, hosting services, maintenance agreements, interfaces, and supporting technologies associated with the MDR solution.

The inventory documents licensed software components, third-party products and services, subscription services, maintenance agreements, renewal schedules, payment frequencies, support obligations, and ownership responsibilities. This information provides DHHS with complete visibility into the assets supporting the MDR solution and supports future operational and financial planning.

## *Knowledge Transfer and Operational Readiness*

A successful turnover depends on the effective transfer of operational and technical knowledge. Conduent conducts a structured program that prepares DHHS personnel and/or successor staff to operate, support, maintain, and enhance the MDR solution.

Conduent tailors transition activities to business users, technical personnel, operational support staff, and management stakeholders so each audience receives the information needed to perform its future responsibilities. Activities include role-based training, system walkthroughs, operational procedure reviews, documentation workshops, shadowing opportunities, transition readiness assessments, and interactive question-and-answer sessions.

The program includes business process documentation, workflow guides, system architecture and technical documentation, configuration and security documentation, interface specifications, support procedures, change management processes, reporting documentation, CMS certification artifacts, troubleshooting guides, and training materials. Formal workshops, hands-on training sessions, document reviews, and operational walkthroughs reinforce knowledge retention and support operational readiness

## *Data, Documentation, and Asset Transition*

Conduent transfers all contract-required deliverables, repositories, documentation, reports, operational artifacts, and Nebraska-owned data and information in formats approved by DHHS.

Transferred assets include historical and current MDR data, claims and rebate information, dispute and accounting records, configuration files, technical and user documentation, project records, decision logs, training materials, and CMS certification documentation. Prior to turnover completion, Conduent validates transferred information for completeness, accuracy, accessibility, and usability to support a successful transition.

## *Business Continuity and Risk Management*

Throughout the turnover period, Conduent maintains established business continuity, disaster recovery, security, and operational support processes to protect ongoing MDR operations.

We actively manage transition risk through risk identification and mitigation planning, operational readiness reviews, transition checkpoints, issue escalation procedures, data reconciliation activities, and security and access management reviews. These activities support continued system availability while protecting critical rebate operations, financial processes, reporting functions, and compliance obligations throughout the transition.

## *Turnover Validation and Final Acceptance*

Prior to turnover completion, Conduent conducts formal transition readiness reviews with DHHS to validate that all turnover requirements have been satisfied. Readiness reviews provide DHHS with visibility into transition status, outstanding activities, and operational preparedness.

Validation activities confirm completion of knowledge transfer activities, transfer of required documentation and data, accessibility of operational and technical information, completion of support transition activities, resolution or transition of open items, and readiness of DHHS and/or successor personnel to support MDR operations.

Following DHHS approval, Conduent provides final turnover reports, transition documentation, and acceptance materials documenting successful completion of turnover activities.

Through disciplined planning, structured knowledge transfer, comprehensive documentation, preservation of CMS certification knowledge, and collaborative transition support, Conduent equips Nebraska DHHS with the resources, operational knowledge, and technical information needed to confidently sustain MDR operations beyond the contract term. Our approach protects continuity of critical rebate operations, preserves institutional knowledge, and provides DHHS with a smooth, low-risk transition path for future system ownership, support, and program success.



Submitted by: **Conduent State Healthcare, LLC**

CONDUENT

**Response to Request for Proposal**

# Medicaid Drug Rebate System (MDR)

## for the State of Nebraska, Department of Health and Human Services (DHHS)

Due Date: **August 6, 2026** | RFP Number: **124528 ON**

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# VI.A.3 Appendix [RFP VI.A.3]

REQUIREMENT: RFP Section VI.A.3

## VI.A.3.a Contractual Agreement Form [RFP VI.A.3.a]

REQUIREMENT: RFP Section VI.A.3.a

Conduent's Contractual Agreement Form is provided on the following page.

## CONTRACTUAL AGREEMENT FORM

BIDDER MUST COMPLETE THE FOLLOWING

By signing this Contractual Agreement Form, the bidder guarantees compliance with the provisions stated in this solicitation and agrees to the terms and conditions unless otherwise indicated in writing and certifies that bidder is not owned by the Chinese Communist Party.

Per Nebraska's Transparency in Government Procurement Act, Neb. Rev Stat § 73-603, DAS is required to collect statistical information regarding the number of contracts awarded to Nebraska Vendors. This information is for statistical purposes only and will not be considered for contract award purposes.

_____ NEBRASKA VENDOR AFFIDAVIT: Bidder hereby attests that bidder is a Nebraska Vendor. "Nebraska Vendor" shall mean any bidder who has maintained a bona fide place of business and at least one employee within this state for at least the six (6) months immediately preceding the posting date of this Solicitation. All vendors who are not a Nebraska Vendor are considered Foreign Vendors under Neb. Rev Stat § 73-603 (c).

_____ I hereby certify that I am a Resident disabled veteran or business located in a designated enterprise zone in accordance with Neb. Rev. Stat. § 73-107 and wish to have preference, if applicable, considered in the award of this contract.

_____ I hereby certify that I am a blind person licensed by the Commission for the Blind & Visually Impaired in accordance with Neb. Rev. Stat. § 71-8611 and wish to have preference considered in the award of this contract.

**THIS FORM MUST BE SIGNED MANUALLY IN INK OR BY DOCUSIGN**

| | |
|---|---|
| COMPANY: | Conduent State Healthcare, LLC |
| ADDRESS: | 100 Campus Drive, Florham Park, NJ 07932 |
| PHONE: | 724-217-6423 |
| EMAIL: | Anna.sever@conduent.com |
| BIDDER NAME & TITLE: | Anna Sever, President Government Solutions |
| SIGNATURE: |  |
| DATE: | 9/22/2026 |

| VENDOR COMMUNICATION WITH THE STATE CONTACT INFORMATION (IF DIFFERENT FROM ABOVE) | |
|---|---|
| NAME: | |
| TITLE: | |
| PHONE: | |
| EMAIL: | |

# VI.A.3.b Responses to Sections II through IV [RFP VI.A.3.b]

**REQUIREMENT: RFP Section VI.A.3.b**

## VI.A.3.b.1 Section II – Terms and Conditions [RFP II]

**REQUIREMENT: RFP Section II**

Conduent's Section II – Terms and Conditions is provided on the following pages.

# II. TERMS AND CONDITIONS

Bidder should read the Terms and Conditions within this section and must initial either "Accept All Terms and Conditions Within Section as Written" or "Exceptions Taken to Terms and Conditions Within Section as Written" in the table below. If exception is not taken to a provision, it is deemed accepted as stated. If the bidder takes any exceptions, they must provide the following within the "Exceptions" field of the table below (Bidder may provide responses in separate attachment if multiple exceptions are taken):

1. The specific clause, including section reference, to which an exception has been taken;
2. An explanation of why the bidder took exception to the clause; and
3. Provide alternative language to the specific clause within the solicitation response.

By signing the solicitation, bidder agrees to be legally bound by all the accepted terms and conditions, and any proposed alternative terms and conditions submitted with the solicitation response. The State reserves the right to negotiate rejected or proposed alternative language. If the State and bidder fail to agree on the final Terms and Conditions, the State reserves the right to reject the solicitation response. The State reserves the right to reject solicitation responses that attempt to substitute the bidder's commercial contracts and/or documents for this solicitation.

| Accept All Terms and Conditions Within Section as Written (Initial) | Exceptions Taken to Terms and Conditions Within Section as Written (Initial) | Exceptions: (Bidder must note the specific clause, including section reference, to which an exception has been taken, an explanation of why the bidder took exception to the clause, and provide alternative language to the specific clause within the solicitation response.) |
|---|---|---|
| | | **Termination for Default/Cause**<br>- **Specific Clause - Breach (Section II.J):** Either Party may terminate the contract, in whole or in part, if the other Party breaches its duty to perform its obligations under the contract in a timely and proper manner. Termination requires written notice of default and a thirty (30) calendar day (or longer at the non-breaching Party's discretion considering the gravity and nature of the default) cure period. Said notice shall be delivered by email, delivery receipt requested; certified mail, return receipt requested; or in person with proof of delivery. Allowing time to cure a failure or breach of contract does not waive the right to immediately terminate the contract for the same or different contract breach which may occur at a different time.<br>- **Basis for Exception:** By its inherent nature, termination for default/cause should be limited to material breaches of material obligations.<br>- **Alternative Language:** Either Party may terminate the contract, in whole or in part, if the other Party materially breaches its duty to perform its material obligations under the contract in a timely and proper manner. Termination requires written notice of default and a thirty (30) calendar day (or longer at the non-breaching Party's discretion considering the gravity and nature of the default) cure period. Said notice shall be delivered by email, delivery receipt requested; certified mail, return receipt requested; or in person with proof of delivery. Allowing time to cure a failure or material breach of contract does not waive the right to immediately terminate the contract for the same or different contract material breach which may occur at a different time.<br><br>**Termination for Convenience**<br>- **Specific Clause – Early Termination (Section II.U.2):** The State, in its sole discretion, may terminate the contract, in whole or in part, for any reason upon thirty (30) calendar day's written notice shall be delivered by email, delivery receipt requested; certified mail, return receipt requested; or in person with proof of delivery to the Vendor. Such termination shall not relieve the Vendor of warranty or other service obligations incurred under the terms of the contract. In the event of |

| | | |
|---|---|---|
| | | termination, the Vendor shall be entitled to payment, determined on a pro rata basis, for products or services satisfactorily performed or provided.<br>- **Basis for Exception:** To make Vendor whole since this State termination right is due to no fault of Vendor.<br>- **Alternative Language:** The State, in its sole discretion, may terminate the contract, in whole or in part, for any reason upon thirty (30) calendar day's written notice shall be delivered by email, delivery receipt requested; certified mail, return receipt requested; or in person with proof of delivery to the Vendor. Such termination shall not relieve the Vendor of warranty or other service obligations incurred under the terms of the contract. In the event of termination, the Vendor shall be entitled to payment, determined on a pro rata basis, for products or services satisfactorily performed or provided, work in progress, costs incurred in performance of the contract through the termination date, and costs incurred as a result of the early termination.<br><br>**Limitation of Liability (New Clause)**<br>- **Specific Clause - (New Clause)**<br>- **Basis for Exception:** Primarily to allow for Offeror's competitive pricing and provide a reasonable apportionment of risk for contracts of this size and complexity<br>- **Alternative Language:** Notwithstanding any contrary provision or the failure of essential purpose of any limited remedy, and except for gross negligence, fraud, willful misconduct, or intellectual property infringement, Vendor's total, maximum, aggregate liability to the State whether in contract, tort (including negligence), products liability, strict liability, or otherwise, shall not exceed the amount paid by the State to the Vendor under this Contract during the 36 months immediately preceding the claim. For the avoidance of doubt, Vendor's total, maximum, aggregate liability hereunder shall be reduced by all amounts paid by the Vendor to the State for all prior claims, if any, under this Contract.<br><br>Neither party shall be liable to the other for any indirect, consequential, incidental or special damages, including, but not limited to, loss of anticipated business, lost profits, income, goodwill, or revenue in connection with, arising out of, or related to this Contract.<br><br>**Damages (New Clause)**<br>- **Specific Clause - (New Clause)**<br>- **Basis for Exception**: Primarily to allow for Offeror's competitive pricing and provide a reasonable apportionment of risk for contracts of this size and complexity.<br>- **Alternative Language:** If Vendor materially fails to meet the Performance Standards identified in ATTACHMENT D – MDR Performance Guarantees of the RFP and the State, federal government, and the State's other contractors all timely performed their respective tasks, and the failure was directly and solely caused by Vendor's own acts or omissions, and Vendor fails to cure its failure within a reasonable cure period of no less than thirty (30) days identified in State's notice, then State may assess the Damages identified in ATTACHMENT D – MDR Performance Guarantees of the RFP for that Performance Standard. Notwithstanding the foregoing or any language, clause, section, or provision to the contrary: (a) the total, maximum, aggregate amount of liquidated damages and associated costs that may be assessed under this Contract shall not exceed three-and-a-half percent (3.5%) of the Vendor's monthly invoice amount for any single month; (b) Vendor shall not be liable for Damages if a failure to meet a Performance Standard is caused, in whole or in part, by changes in scope, the acts or omissions of the State or a third party, or a force majeure event; (c) Vendor has a right to dispute any Damages assessment with which it does not |

| | | |
|---|---|---|
| | | agree; (d) the assessment of Damages is the State's sole and exclusive remedy for the Vendor's failure to achieve any Performance Standard or for any delay or other event that triggers Damages; and (e) for avoidance of doubt, if a single failure, delay, or other event triggers multiple Damages, the State only can assess one (1) Damage.<br>-<br>**Performance Guarantees (Attachment D, IVM-69)**<br>- **Specific Clause – Attachment D, IVM-69**: Vendor must complete all disputes received through each quarterly invoicing cycle in entirety before the initiation of the subsequent invoicing cycle.<br>Complete all disputes received through each quarterly invoicing cycle in entirety before the initiation of the subsequent invoicing cycle.<br>- **Basis of Exception**: To account for dispute resolution activities that are dependent upon manufacturer participation and responsiveness.<br>- **Alternative Language**: Vendor must complete all disputes received through each quarterly invoicing cycle in entirety before the initiation of the subsequent invoicing cycle.<br>Complete all disputes received through each quarterly invoicing cycle in entirety before the initiation of the subsequent invoicing cycle. Disputes requiring manufacturer participation or response may remain open provided the Vendor has made timely, documented efforts toward resolution.<br><br>**Performance Guarantees (Attachment D, ACC-01)**<br>- **Specific Clause – Attachment D, ACC-01**: Solution must capture, or convert electronically, the prior quarter adjustment statement (PQAS) and reconciliation of state invoices (ROSIs), perform line-item match by drug, link to the invoice and identify disputes when payments are received. Within three (3) business days of when payments are received.<br>- **Basis of Exception**: To allow sufficient time for large check allocations, (e.g., 100+ page check allocations).<br>- **Alternative Language**: Solution must capture, or convert electronically, the prior quarter adjustment statement (PQAS) and reconciliation of state invoices (ROSIs), perform line-item match by drug, link to the invoice and identify disputes when payments are received. Within ten (10) business days of when payments are received. |

The bidders should submit with their solicitation response any license, user agreement, service level agreement, or similar documents that the bidder wants incorporated in the Contract. The State will not consider incorporation of any document not submitted with the solicitation response as the document will not have been included in the evaluation process. These documents shall be subject to negotiation and will be incorporated as addendums if agreed to by the Parties.

If a conflict or ambiguity arises after the Addendum to Contract Award has been negotiated and agreed to, the Addendum to Contract Award shall be interpreted as follows:

1. If only one (1) Party has a particular clause, then that clause shall control,
2. If both Parties have a similar clause, but the clauses do not conflict, the clauses shall be read together,
3. If both Parties have a similar clause, but the clauses conflict, the State's clause shall control.

A **GENERAL**

1. The contract resulting from this Solicitation shall incorporate the following documents:

   a. Solicitation, including any attachments and addenda;

b. Questions and Answers;
c. Bidder's properly submitted solicitation response, including any terms and conditions or agreements submitted by the bidder;
d. Addendum to Contract Award (if applicable); and
e. Amendments to the Contract (if applicable)

These documents constitute the entirety of the contract.

Unless otherwise specifically stated in a future contract amendment, in case of any conflict between the incorporated documents, the documents shall govern in the following order of preference with number one (1) receiving preference over all other documents and with each lower numbered document having preference over any higher numbered document: 1) Amendment to the executed Contract with the most recent dated amendment having the highest priority, 2) Executed Contract and any attached Addenda 3) Addendums to the solicitation and any Questions and Answers, 4) the original solicitation document and any Addenda or attachments, and 5) the Vendor's submitted solicitation response, including any terms and conditions or agreements that are accepted by the State.

Unless otherwise specifically agreed to in writing by the State, the State's standard terms and conditions, as executed by the State, shall always control over any terms and conditions or agreements submitted or included by the Vendor.

Any ambiguity or conflict in the contract discovered after its execution, not otherwise addressed herein, shall be resolved in accordance with the rules of contract interpretation as established in the State of Nebraska.

B. **NOTIFICATION**

Bidder and State shall identify the contract manager who shall serve as the point of contact for the executed contract.

Communications regarding the executed contract shall be in writing and shall be deemed to have been given if delivered personally; electronically, return receipt requested; or mailed, return receipt requested. All notices, requests, or communications shall be deemed effective upon receipt.

Either party may change its address for notification purposes by giving notice of the change and setting forth the new address and an effective date.

C. **BUYER'S REPRESENTATIVE**

The State reserves the right to appoint a Buyer's Representative to manage or assist the Buyer in managing the contract on behalf of the State. The Buyer's Representative will be appointed in writing, and the appointment document will specify the extent of the Buyer's Representative authority and responsibilities. If a Buyer's Representative is appointed, the bidder will be provided a copy of the appointment document and is expected to cooperate accordingly with the Buyer's Representative. The Buyer's Representative has no authority to bind the State to a contract, amendment, addendum, or other change or addition to the contract.

D. **GOVERNING LAW (Nonnegotiable)**

Notwithstanding any other provision of this contract, or any amendment or addendum(s) entered into contemporaneously or at a later time, the parties understand and agree that, (1) the State of Nebraska is a sovereign state and its authority to contract is therefore subject to limitation by the State's Constitution, statutes, common law, and regulation; (2) this contract will be interpreted and enforced under the laws of the State of Nebraska; (3) any action to enforce the provisions of this agreement must be brought in the State of Nebraska per state law; (4) the person signing this contract on behalf of the State of Nebraska does not have the authority to waive the State's sovereign immunity, statutes, common law, or regulations; (5) the indemnity, limitation of liability, remedy, and other similar provisions of the final contract, if any, are entered into subject to the State's Constitution, statutes, common law, regulations, and sovereign immunity; and, (6) all terms and conditions of the final contract, including but not limited to the clauses concerning third party use, licenses, warranties, limitations of liability, governing law and venue, usage verification, indemnity, liability, remedy or other similar provisions of the final contract are entered into specifically subject to the State's Constitution, statutes, common law, regulations, and sovereign immunity.

The Parties must comply with all applicable local, state, and federal laws, ordinances, rules, orders, and regulations.

E. **BEGINNING OF WORK & SUSPENSION OF SERVICES**

The bidder shall not commence any billable work until a valid contract has been fully executed by the State and the successful Vendor. The Vendor will be notified in writing when work may begin.

The State may, at any time and without advance notice, require the Vendor to suspend any or all performance or deliverables provided under this Contract. In the event of such suspension, the Contract Manager or POC, or their designee, will issue a written order to stop work. The written order will specify which activities are to be immediately suspended and the reason(s) for the suspension. Upon receipt of such order, the Vendor shall immediately comply with its terms and take all necessary steps to mitigate and eliminate the incurrence of costs allocable to the work affected by the order during the period of suspension. The suspended performance or deliverables may only resume when the State provides the Vendor with written notice that such performance or deliverables may resume, in whole or in part.

F. **AMENDMENT**

This Contract may be amended in writing, within scope, upon the agreement of both parties.

G. **CHANGE ORDERS OR SUBSTITUTIONS**

The State and the Vendor, upon the written agreement, may make changes to the contract within the general scope of the solicitation. Changes may involve specifications, the quantity of work, or such other items as the State may find necessary or desirable. Corrections of any deliverable, service, or work required pursuant to the contract shall not be deemed a change. The Vendor may not claim forfeiture of the contract by reasons of such changes.

The Vendor shall prepare a written description of the work required due to the change and an itemized cost sheet for the change. Changes in work and the amount of compensation to be paid to the Vendor shall be determined in accordance with applicable unit prices if any, a pro-rated value, or through negotiations. The State shall not incur a price increase for changes that should have been included in the Vendor's solicitation response, were foreseeable, or result from difficulties with or failure of the Vendor's solicitation response or performance.

No change shall be implemented by the Vendor until approved by the State, and the Contract is amended to reflect the change and associated costs, if any. If there is a dispute regarding the cost, but both parties agree that immediate implementation is necessary, the change may be implemented, and cost negotiations may continue with both Parties retaining all remedies under the contract and law.

In the event any good or service is discontinued or replaced upon mutual consent during the contract period or prior to delivery, the State reserves the right to amend the contract to include the alternate product at the same price.

*****Vendor will not substitute any item that has been awarded without prior written approval of DHHS*****

H. **RECORD OF VENDOR PERFORMANCE**

The State may document the vendor's performance, which may include, but is not limited to, the customer service provided by the vendor, the ability of the vendor, the skill of the vendor, and any instance(s) of products or services delivered or performed which fail to meet the terms of the purchase order, contract, and/or specifications. In addition to other remedies and options available to the State, the State may issue one or more notices to the vendor outlining any issues the State has regarding the vendor's performance for a specific contract ("Contract Compliance Request"). The State may also document the Vendor's performance in a report, which may or may not be provided to the vendor ("Contract Non-Compliance Notice"). The Vendor shall respond to any Contract Compliance Request or Contract Non-Compliance Notice in accordance with such notice or request. At the sole discretion of the State, such Contract Compliance Requests and Contract Non-Compliance Notices may be placed in the State's records regarding the vendor and may be considered by the State and held against the vendor in any future contract or award opportunity. The record of vendor performance will be considered in any suspension or debarment action.

I. **NOTICE OF POTENTIAL VENDOR BREACH**

If Vendor breaches the contract or anticipates breaching the contract, the Vendor shall immediately give written notice to the State. The notice shall explain the breach or potential breach, a proposed cure, and may include a request for a waiver of the breach if so desired. The State may, in its discretion, temporarily or permanently waive the breach. By granting a waiver, the State does not forfeit any rights or remedies to which the State is entitled by law or equity, or pursuant to the provisions of the contract. Failure to give immediate notice, however, may be grounds for denial of any request for a waiver of a breach.

J. **BREACH**

Either Party may terminate the contract, in whole or in part, if the other Party breaches its duty to perform its obligations under the contract in a timely and proper manner. Termination requires written notice of default and a thirty (30) calendar day (or longer at the non-breaching Party's discretion considering the gravity and nature of the default) cure period. Said notice shall be delivered by email, delivery receipt requested; certified mail, return receipt requested; or

in person with proof of delivery. Allowing time to cure a failure or breach of contract does not waive the right to immediately terminate the contract for the same or different contract breach which may occur at a different time.

The State's failure to make payment shall not be a breach, and the Vendor shall retain all available statutory remedies.

K. **NON-WAIVER OF BREACH**

The acceptance of late performance with or without objection or reservation by a Party shall not waive any rights of the Party nor constitute a waiver of the requirement of timely performance of any obligations remaining to be performed.

L. **SEVERABILITY**

If any term or condition of the contract is declared by a court of competent jurisdiction to be illegal or in conflict with any law, the validity of the remaining terms and conditions shall not be affected, and the rights and obligations of the parties shall be construed and enforced as if the contract did not contain the provision held to be invalid or illegal.

M. **INDEMNIFICATION 1. GENERAL**

The Vendor agrees to defend, indemnify, and hold harmless the State and its employees, volunteers, agents, and its elected and appointed officials ("the indemnified parties") from and against any and all third party claims, liens, demands, damages, liability, actions, causes of action, losses, judgments, costs, and expenses of every nature, including investigation costs and expenses, settlement costs, and attorney fees and expenses ("the claims"), sustained or asserted against the State for personal injury, death, or property loss or damage, arising out of, resulting from, or attributable to the willful misconduct, negligence, error, or omission of the Vendor, its employees, Subcontractors, consultants, representatives, and agents, resulting from this contract, except to the extent such Vendor liability is attenuated by any action of the State which directly and proximately contributed to the claims.

**2. INTELLECTUAL PROPERTY**

The Vendor agrees it will, at its sole cost and expense, defend, indemnify, and hold harmless the indemnified parties from and against any and all claims, to the extent such claims arise out of, result from, or are attributable to, the actual or alleged infringement or misappropriation of any patent, copyright, trade secret, trademark, or confidential information of any third party by the Vendor or its employees, Subcontractors, consultants, representatives, and agents; provided, however, the State gives the Vendor prompt notice in writing of the claim. The Vendor may not settle any infringement claim that will affect the State's use of the Licensed Software without the State's prior written consent, which consent may be withheld for any reason.

If a judgment or settlement is obtained or reasonably anticipated against the State's use of any intellectual property for which the Vendor has indemnified the State, the Vendor shall, at the Vendor's sole cost and expense, promptly modify the item or items which were determined to be infringing, acquire a license or licenses on the State's behalf to provide the necessary rights to the State to eliminate the infringement, or provide the State with a non-infringing substitute that provides the State the same functionality. At the State's election, the actual or anticipated judgment may be treated as a breach of warranty by the Vendor, and the State may receive the remedies provided under this Solicitation.

**3. PERSONNEL**

The Vendor shall, at its expense, indemnify and hold harmless the indemnified parties from and against any claim with respect to withholding taxes, worker's compensation, employee benefits, or any other claim, demand, liability, damage, or loss of any nature relating to any of the personnel, including subcontractor's and their employees, provided by the Vendor.

**4. SELF-INSURANCE**

The State of Nebraska is self-insured for any loss and purchases excess insurance coverage pursuant to Neb. Rev. Stat. § 81-8,239.01. If there is a presumed loss under the provisions of this agreement, Vendor may file a claim with the Office of Risk Management pursuant to Neb. Rev. Stat. §§ 81-8,239.01 to 81-8,306 for review by the State Claims Board. The State retains all rights and immunities under the State Miscellaneous (Neb. Rev. Stat. § 81-8,294), Tort (Neb. Rev. Stat. § 81-8,209), and Contract Claim Acts (Neb. Rev. Stat. § 81-8,302), as outlined in state law and accepts liability under this agreement only to the extent provided by law.

5. The Parties acknowledge that Attorney General for the State of Nebraska is required by statute to represent the legal interests of the State, and that any provision of this indemnity clause is subject to the statutory authority of the Attorney General.

N. **ATTORNEY'S FEES**

In the event of any litigation, appeal, or other legal action to enforce any provision of the contract, the Parties agree to pay all expenses of such action, as permitted by law and if ordered by the court, including attorney's fees and costs, if the other Party prevails.

O. **PERFORMANCE BOND**

The Awarded Bidder will be required to supply a bond executed by a corporation authorized to contract surety in the State of Nebraska, payable to the State of Nebraska, which shall be valid for the life of the contract to include any renewal and/or extension periods. **The amount of the bond must be 100 percent of the contract amount.** The bond will guarantee that the Awarded Bidder will faithfully perform all requirements, terms and conditions of the contract. Failure to comply shall be grounds for forfeiture of the bond as liquidated damages. Amount of forfeiture will be determined by the agency based on loss to the State. The bond will be returned when the contract has been satisfactorily completed as solely determined by the State, after termination or expiration of the contract.

P. **ASSIGNMENT, SALE, OR MERGER**

Either Party may assign the contract upon mutual written agreement of the other Party. Such agreement shall not be unreasonably withheld.

The Vendor retains the right to enter into a sale, merger, acquisition, internal reorganization, or similar transaction involving Vendor's business. Vendor agrees to cooperate with the State in executing amendments to the contract to allow for the transaction. If a third party or entity is involved in the transaction, the Vendor will remain responsible for performance of the contract until such time as the person or entity involved in the transaction agrees in writing to be contractually bound by this contract and perform all obligations of the contract.

Q. **CONTRACTING WITH OTHER NEBRASKA POLITICAL SUBDIVISIONS OF THE STATE OR ANOTHER STATE**

The Vendor may, but shall not be required to, allow agencies, as defined in Neb. Rev. Stat. § 81-145(2), to use this contract. The terms and conditions, including price, of the contract may not be amended. The State shall not be contractually obligated or liable for any contract entered into pursuant to this clause. A listing of Nebraska political subdivisions may be found at the website of the Nebraska Auditor of Public Accounts.

The Vendor may, but shall not be required to, allow other states, agencies or divisions of other states, or political subdivisions of other states to use this contract. The terms and conditions, including price, of this contract shall apply to any such contract, but may be amended upon mutual consent of the Parties. The State of Nebraska shall not be contractually or otherwise obligated or liable under any contract entered into pursuant to this clause. The State shall be notified if a contract is executed based upon this contract.

R. **FORCE MAJEURE**

Neither Party shall be liable for any costs or damages, or for default resulting from its inability to perform any of its obligations under the contract due to a natural or manmade event outside the control and not the fault of the affected Party ("Force Majeure Event") that was not foreseeable at the time the Contract was executed. The Party so affected shall immediately make a written request for relief to the other Party and shall have the burden of proof to justify the request. The other Party may grant the relief requested; relief may not be unreasonably withheld. Labor disputes with the impacted Party's own employees will not be considered a Force Majeure Event.

S. **COMPLIANCE WITH PRESIDENTIAL EXECUTIVE ORDERS 14151 AND 14173**

Executive Order 14151, issued by President Donald Trump on January 20, 2025, and Executive Order 14173, issued by President Donald Trump on January 21, 2025, prohibit discriminatory "diversity, equity, and inclusion" (DEI) programs and "diversity, equity, inclusion, and accessibility" (DEIA) mandates, policies, programs, preferences, and activities in the federal government. If the Contract involves federal funds, Contractor shall not use contract funds for any DEI program or for any DEIA mandate, policy, program, or preference. Contractor shall assure its compliance and the compliance of any subcontractors with all requirements of Executive orders 14151 and 14173.

T. **CONFIDENTIALITY**

All materials and information provided by the Parties or acquired by a Party on behalf of the other Party shall be regarded as confidential information. All materials and information provided or acquired shall be handled in

accordance with federal and state law, and ethical standards. Should said confidentiality be breached by a Party, the Party shall notify the other Party immediately of said breach and take immediate corrective action.

It is incumbent upon the Parties to inform their officers and employees of the penalties for improper disclosure imposed by the Privacy Act of 1974, 5 U.S.C. 552a. Specifically, 5 U.S.C. 552a (i)(1), which is made applicable by 5 U.S.C. 552a (m)(1), provides that any officer or employee, who by virtue of his/her employment or official position has possession of or access to agency records which contain individually identifiable information, the disclosure of which is prohibited by the Privacy Act or regulations established thereunder, and who knowing that disclosure of the specific material is prohibited, willfully discloses the material in any manner to any person or agency not entitled to receive it, shall be guilty of a misdemeanor and fined not more than $5,000.

U. **EARLY TERMINATION**

The contract may be terminated as follows:

1. The State and the Vendor, by mutual written agreement, may terminate the contract, in whole or in part, at any time.
2. The State, in its sole discretion, may terminate the contract, in whole or in part, for any reason upon thirty (30) calendar day's written notice shall be delivered by email, delivery receipt requested; certified mail, return receipt requested; or in person with proof of delivery to the Vendor. Such termination shall not relieve the Vendor of warranty or other service obligations incurred under the terms of the contract. In the event of termination, the Vendor shall be entitled to payment, determined on a pro rata basis, for products or services satisfactorily performed or provided.
3. The State may terminate the contract, in whole or in part, immediately for the following reasons: a. if directed to do so by statute,
   b. Vendor has made an assignment for the benefit of creditors, has admitted in writing its inability to pay debts as they mature, or has ceased operating in the normal course of business,
   c. a trustee or receiver of the Vendor or of any substantial part of the Vendor's assets has been appointed by a court,
   d. fraud, misappropriation, embezzlement, malfeasance, misfeasance, or illegal conduct pertaining to performance under the contract by its Vendor, its employees, officers, directors, or shareholders,
   e. an involuntary proceeding has been commenced by any Party against the Vendor under any one of the chapters of Title 11 of the United States Code and (i) the proceeding has been pending for at least sixty (60) calendar days; or (ii) the Vendor has consented, either expressly or by operation of law, to the entry of an order for relief; or (iii) the Vendor has been decreed or adjudged a debtor,
   f. a voluntary petition has been filed by the Vendor under any of the chapters of Title 11 of the United States Code,
   g. Vendor intentionally discloses confidential information,
   h. Vendor has or announces it will discontinue support of the deliverable; and,
   i. In the event funding is no longer available.

V. **CONTRACT CLOSEOUT**

Upon termination of the contract for any reason the Vendor shall within thirty (30) days, unless stated otherwise herein:

1. Transfer all completed or partially completed deliverables to the State,
2. Transfer ownership and title to all completed or partially completed deliverables to the State,
3. Return to the State all information and data unless the Vendor is permitted to keep the information or data by contract or rule of law. Vendor may retain one copy of any information or data as required to comply with applicable work product documentation standards or as are automatically retained in the course of Vendor's routine back up procedures,
4. Cooperate with any successor Vendor, person, or entity in the assumption of any or all of the obligations of this contract,
5. Cooperate with any successor Vendor, person, or entity with the transfer of information or data related to this contract,
6. Return or vacate any state owned real or personal property; and,
7. Return all data in a mutually acceptable format and manner.

Nothing in this section should be construed to require the Vendor to surrender intellectual property, real or personal property, or information or data owned by the Vendor for which the State has no legal claim.

W. **PROHIBITED PRODUCTS**

The State will not accept Gray Market Products for this solicitation. Gray Market is defined as the trade of a commodity through distribution channels which, while legal, are unofficial, unauthorized, or unintended by the original manufacturer. Gray Market items are not designed to be sold in a particular market and cannot be supported by the authorized importer because of various reasons.

The State will not accept any products made by a company owned by the Chinese Communist Party. Furthermore, pursuant to Executive Order No. 23-05, the State will not accept any communications equipment or services developed by organizations on the Federal Communications Commission's Covered List.

The State will not accept goods from countries or persons identified on the Office of Foreign Assets Control Sanctions List.

X. **AMERICANS WITH DISABILITIES ACT**

Vendor shall comply with all applicable provisions of the Americans with Disabilities Act of 1990 (42 U.S.C. 12131–12134), as amended by the ADA Amendments Act of 2008 (ADA Amendments Act) (Pub.L. 110–325, 122 Stat. 3553 (2008)), which prohibits discrimination on the basis of disability by public entities.

Y. **LONG-TERM CARE OMBUDSMAN (Nonnegotiable)**

Vendor must comply with the Long-Term Care Ombudsman Act, per Neb. Rev. Stat. § 81-2237 et seq. This section shall survive the termination of this contract.

Z. **OFFICE OF PUBLIC COUNSEL (Nonnegotiable)**

If it provides, under the terms of this contract and on behalf of the State of Nebraska, health and human services to individuals; service delivery; service coordination; or case management, Vendor shall submit to the jurisdiction of the Office of Public Counsel, pursuant to Neb. Rev. Stat. § 81-8,240 et seq. This section shall survive the termination of this contract.

AA. **LOBBYING**

1. No federal or state funds paid under this RFP shall be paid for any lobbying costs as set forth herein.

2. Lobbying Prohibited by 31 U.S.C. § 1352 and 45 CFR §§ 93 et seq, and Required Disclosures.

   a. Contractor certifies that no federal or state appropriated funds shall be paid, by or on behalf of Contractor, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this award for: (a) the awarding of any federal agreement; (b) the making of any federal grant; (c) the entering into of any cooperative agreement; and (d) the extension, continuation, renewal, amendment, or modification of any federal agreement, grant, loan, or cooperative agreement.

   b. If any funds, other than federal appropriated funds, have been paid or will be paid to any person for influencing or attempting to influence: an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with Contractor, Contractor shall complete and submit Federal Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

3. Lobbying Activities Prohibited under Federal Appropriations Bills.

   a. No funds paid under this RFP shall be used, other than for normal and recognized executive-legislative relationships, for publicity or propaganda purposes, for the preparation, distribution, or use of any kit, pamphlet, booklet, publication, electronic communication, radio, television, or video presentation designed to support or defeat the enactment of legislation before the Congress or any State or local legislature or legislative body, except in presentation of the Congress or any State or local legislature itself, or designed to support or defeat any proposed or pending regulation, administrative action, or order issued by the executive branch of any state or local government itself.

   b. No funds paid under this RFP shall be used to pay the salary or expenses of any grant or contract recipient, or agent acting for such recipient, related to any activity designed to influence the enactment of legislation, appropriations, regulation, administrative action, or Executive order proposed or pending

before the Congress or any State government, State legislature or local legislature or legislative body, other than normal and recognized executive legislative relationships or participation by an agency or officer of an State, local or tribal government in policymaking and administrative processes within the executive branch of that government.

c. The prohibitions in the two sections immediately above shall include any activity to advocate or promote any proposed, pending, or future federal, state or local tax increase, or any proposed, pending, or future requirement or restriction on any legal consumer product, including its sale of marketing, including but not limited to the advocacy or promotion of gun control.

**4.** Lobbying Costs Unallowable Under the Cost Principles. In addition to the above, no funds shall be paid for executive lobbying costs as set forth in 45 CFR § 75.450(b). If Contractor is a nonprofit organization or an Institute of Higher Education, other costs of lobbying are also unallowable as set forth in 45 CFR § 75.450(c).

BB. **RETAINAGE**

The State will withhold 5% of each payment until the MDR system is CMS Certified. The entire retainage amount will be payable upon CMS Certification. The State may reject the final invoice by identifying the specific reasons for such rejection in writing to the Vendor within forty-five (45) calendar days of receipt of the final invoice. Otherwise, the project will be deemed accepted, and the State will release the final payment and retainage in accordance with the contract payment terms.

CC. **PERFORMANCE GUARANTEES/LIQUIDATED DAMAGES**

Failure to adhere to the performance guarantees as listed in Attachment D – MDR Performance Guarantees, as agreed upon by the parties may result in an assessment of damages specific to the Functional Requirement ID.

## VI.A.3.b.2 Section III – Vendor Duties [RFP III]

**REQUIREMENT: RFP Section III**

Conduent meets this requirement. Conduent does not require additional vendors or subcontractors to perform the services described in this RFP. Conduent will provide all required implementation, maintenance, operations, support, training, and Medicaid Drug Rebate services using Conduent personnel, processes, and technology.

Conduent's Section III – Vendor Duties is provided on the following pages.

# III. VENDOR DUTIES

Bidder should read the Vendor Duties within this section and must initial either "Accept All Terms and Conditions Within Section as Written" or "Exceptions Taken to Vendor Duties Within Section as Written" in the table below. If exception is not taken to a provision, it is deemed accepted as stated. If the bidder takes any exceptions, they must provide the following within the "Exceptions" field of the table below (Bidder may provide responses in separate attachment if multiple exceptions are taken):

1. The specific clause, including section reference, to which an exception has been taken;
2. An explanation of why the bidder took exception to the clause; and
3. Provide alternative language to the specific clause within the solicitation response.

By signing the solicitation, bidder agrees to be legally bound by all the accepted terms and conditions, and any proposed alternative terms and conditions submitted with the solicitation response. The State reserves the right to negotiate rejected or proposed alternative language. If the State and bidder fail to agree on the final Terms and Conditions, the State reserves the right to reject the solicitation response. The State reserves the right to reject solicitation responses that attempt to substitute the bidder's commercial contracts and/or documents for this solicitation.

| Accept All Vendor Duties Within Section as Written (Initial) | Exceptions Taken to Vendor Duties Within Section as Written (Initial) | Exceptions:<br>(Bidder must note the specific clause, including section reference, to which an exception has been taken, an explanation of why the bidder took exception to the clause, and provide alternative language to the specific clause within the solicitation response.) |
|---|---|---|
| | | **Termination for Default/Cause**<br>- **Specific Clause - Termination (Section III.U.7.a.):** DHHS may immediately terminate the Contract, and any and all associated contracts, if DHHS determines that Contractor has violated a material term of the Contract<br>- **Basis for Exception:** By its inherent nature, termination for default/cause should be limited to material breaches of material obligations.<br>- **Alternative Language:** DHHS may immediately terminate the Contract, and any and all associated contracts, if DHHS determines that Contractor has materially violated a material term of the Contract. |

A. **INDEPENDENT VENDOR / OBLIGATIONS**

It is agreed that the Vendor is an independent Vendor and that nothing contained herein is intended or should be construed as creating or establishing a relationship of employment, agency, or a partnership.

The Vendor is solely responsible for fulfilling the contract. The Vendor or the Vendor's representative shall be the sole point of contact regarding all contractual matters.

The Vendor shall secure, at its own expense, all personnel required to perform the services under the contract. The personnel the Vendor uses to fulfill the contract shall have no contractual or other legal relationship with the State, they shall not be considered employees of the State and shall not be entitled to any compensation, rights or benefits from the State, including but not limited to, tenure rights, medical and hospital care, sick and vacation leave, severance pay, or retirement benefits.

By-name personnel commitments made in the bidder's solicitation response shall not be changed without the prior written approval of the State. Replacement of these personnel, if approved by the State, shall be with personnel of equal or greater ability and qualifications.

All personnel assigned by the Vendor to the contract shall be employees of the Vendor or a subcontractor and shall be fully qualified to perform the work required herein. Personnel employed by the Vendor or a subcontractor to fulfill the terms of the contract shall remain under the sole direction and control of the Vendor or the subcontractor respectively.

With respect to its employees, the Vendor agrees to be solely responsible for the following:

1. Any and all pay, benefits, employment taxes and/or other payroll withholding,

2. Any and all vehicles used by the Vendor's employees, including all insurance required by state law,
3. Damages incurred by Vendor's employees within the scope of their duties under the contract,
4. Maintaining Workers' Compensation and health insurance that complies with state and federal law and submitting any reports on such insurance to the extent required by governing law,
5. Determining the hours to be worked and the duties to be performed by the Vendor's employees; and,
6. All claims on behalf of any person arising out of employment or alleged employment (including without limit claims of discrimination alleged against the Vendor, its officers, agents, or subcontractors or subcontractor's employees).

If the Vendor intends to utilize any subcontractor, the subcontractor's level of effort, tasks, and time allocation should be clearly defined in the solicitation response. The Vendor shall agree that it will not utilize any subcontractors not specifically included in its solicitation response in the performance of the contract without the prior written authorization of the State. If the Vendor subcontracts any of the work, the Vendor agrees to pay any and all subcontractors in accordance with the Vendor's agreement with the respective subcontractor(s).

The State reserves the right to require the Vendor to reassign or remove from the project any Vendor or subcontractor employee.

Vendor shall ensure that the terms and conditions contained in any contract with a subcontractor does not conflict with the terms and conditions of this contract.

The Vendor shall include a similar provision, for the protection of the State, in the contract with any Subcontractor engaged to perform work on this contract.

B. **FOREIGN ADVERSARY CONTRACTING PROHIBITION ACT CERTIFICATION (Nonnegotiable)**

The Vendor certifies that it is not a scrutinized company as defined under the Foreign Adversary Contracting Prohibition Act, Neb. Rev. Stat. Sec. § 73-903 (5); that it will not subcontract with any scrutinized company for any aspect of performance of the contemplated contract; and that any products or services to be provided do not originate with a scrutinized company.

C. **EMPLOYEE WORK ELIGIBILITY STATUS**

The Vendor is required and hereby agrees to use a federal immigration verification system to determine the work eligibility status of employees physically performing services within the State of Nebraska. A federal immigration verification system means the electronic verification of the work authorization program authorized by the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, 8 U.S.C. 1324a, known as the E-Verify Program, or an equivalent federal program designated by the United States Department of Homeland Security or other federal agency authorized to verify the work eligibility status of an employee.

If the Vendor is an individual or sole proprietorship, the following applies:

1. The Vendor must complete the United States Citizenship Attestation Form, available on the Department of Administrative Services website at https://das.nebraska.gov/materiel/docs/pdf/Individual%20or%20Sole%20Proprietor%20United%20States%20Attestation%20Form%20English%20and%20Spanish.pdf
2. The completed United States Attestation Form should be submitted with the Solicitation response.
3. If the Vendor indicates on such attestation form that he or she is a qualified alien, the Vendor agrees to provide the US Citizenship and Immigration Services documentation required to verify the Vendor's lawful presence in the United States using the Systematic Alien Verification for Entitlements (SAVE) Program.
4. The Vendor understands and agrees that lawful presence in the United States is required, and the Vendor may be disqualified or the contract terminated if such lawful presence cannot be verified as required by Neb. Rev. Stat. § 4-108.

D. **COMPLIANCE WITH CIVIL RIGHTS LAWS AND EQUAL OPPORTUNITY EMPLOYMENT / NONDISCRIMINATION (Nonnegotiable)**

The Vendor shall comply with all applicable local, state, and federal statutes and regulations regarding civil rights laws and equal opportunity employment. The Nebraska Fair Employment Practice Act prohibits Vendors of the State of Nebraska, and their Subcontractors, from discriminating against any employee or applicant for employment, with respect to hire, tenure, terms, conditions, compensation, or privileges of employment because of race, color, religion, sex, disability, marital status, or national origin (Neb. Rev. Stat. §§ 48-1101 to 48-1125). The Vendor guarantees compliance with the Nebraska Fair Employment Practice Act, and breach of this provision shall be regarded as a material breach of contract. The Vendor shall insert a similar provision in all Subcontracts for goods and services to be covered by any contract resulting from this Solicitation.

E. **COOPERATION WITH OTHER VENDORS**

Vendor may be required to work with or in close proximity to other Vendors or individuals that may be working on same or different projects. The Vendor shall agree to cooperate with such other Vendors or individuals and shall not commit or permit any act which may interfere with the performance of work by any other Vendor or individual. Vendor is not required to compromise Vendor's intellectual property or proprietary information unless expressly required to do so by this contract.

F. **DISCOUNTS**

Prices quoted shall be inclusive of ALL trade discounts. Cash discount terms of less than thirty (30) days will not be considered as part of the solicitation response. Cash discount periods will be computed from the date of receipt of a properly executed claim voucher or the date of completion of delivery of all items in a satisfactory condition, whichever is later.

G. **PRICES**

Prices quoted shall be net, including transportation and delivery charges fully prepaid by the bidder, F.O.B. destination named in the Solicitation. No additional charges will be allowed for packing, packages, or partial delivery costs. When an arithmetic error has been made in the extended total, the unit price will govern.

Prices submitted on the cost sheet, once accepted by the State, **shall remain fixed for the first five years (5)** of the contract. Any request for a price increase subsequent to the initial term of the contract **shall not exceed three percent (3%).** Increases shall not be cumulative and will only apply to that period of the contract. Any additional requests for price increases must be submitted in writing to DHHS a minimum of **180 days prior to the end of the current contract period**. Documentation shall be required by the State to support the price increase.

**The State reserves the right to deny any requested price increase. No price increases are to be billed to any State Agencies prior to written amendment of the contract by the parties.**

**The State will be given full proportionate benefit of any decreases for the term of the contract.**

H. **PERMITS, REGULATIONS, LAWS**

The contract price shall include the cost of all royalties, licenses, permits, and approvals, whether arising from patents, trademarks, copyrights or otherwise, that are in any way involved in the contract. The Vendor shall obtain and pay for all royalties, licenses, and permits, and approvals necessary for the execution of the contract. The Vendor must guarantee that it has the full legal right to the materials, supplies, equipment, software, and other items used to execute this contract.

I. **OWNERSHIP OF INFORMATION AND DATA / DELIVERABLES**

The State shall have the unlimited right to publish, duplicate, use, and disclose all information and data developed or obtained by the Vendor on behalf of the State pursuant to this contract.

The State shall own and hold exclusive title to any deliverable developed as a result of this contract. Vendor shall have no ownership interest or title, and shall not patent, license, or copyright, duplicate, transfer, sell, or exchange, the design, specifications, concept, or deliverable.

J. **INSURANCE REQUIREMENTS**

The Vendor shall throughout the term of the contract maintain insurance as specified herein and provide the State a current Certificate of Insurance/Acord Form (COI) verifying the coverage. The Vendor shall not commence work on the contract until the insurance is in place. If Vendor subcontracts any portion of the Contract the Vendor must, throughout the term of the contract, either:

1. Provide equivalent insurance for each subcontractor and provide a COI verifying the coverage for the subcontractor,
2. Require each subcontractor to have equivalent insurance and provide written notice to the State that the Vendor has verified that each subcontractor has the required coverage; or,
3. Provide the State with copies of each subcontractor's Certificate of Insurance evidencing the required coverage.

The Vendor shall not allow any Subcontractor to commence work until the Subcontractor has equivalent insurance. The failure of the State to require a COI, or the failure of the Vendor to provide a COI or require subcontractor insurance shall not limit, relieve, or decrease the liability of the Vendor hereunder.

In the event that any policy written on a claims-made basis terminates or is canceled during the term of the contract or within (four) (4) years of termination or expiration of the contract, the Vendor shall obtain an extended discovery or

reporting period, or a new insurance policy, providing coverage required by this contract for the term of the contract and (four) (4) years following termination or expiration of the contract.

If by the terms of any insurance a mandatory deductible is required, or if the Vendor elects to increase the mandatory deductible amount, the Vendor shall be responsible for payment of the amount of the deductible in the event of a paid claim.

Notwithstanding any other clause in this Contract, the State may recover up to the liability limits of the insurance policies required herein.

1. **WORKERS' COMPENSATION INSURANCE**

The Vendor shall take out and maintain during the life of this contract the statutory Workers' Compensation and Employer's Liability Insurance for all of the contactors' employees to be engaged in work on the project under this contract and, in case any such work is sublet, the Vendor shall require the Subcontractor similarly to provide Worker's Compensation and Employer's Liability Insurance for all of the Subcontractor's employees to be engaged in such work. This policy shall be written to meet the statutory requirements for the state in which the work is to be performed, including Occupational Disease. **The policy shall include a waiver of subrogation in favor of the State. The COI shall contain the mandatory COI subrogation waiver language found hereinafter**. The amounts of such insurance shall not be less than the limits stated hereinafter. For employees working in the State of Nebraska, the policy must be written by an entity authorized by the State of Nebraska Department of Insurance to write Workers' Compensation and Employer's Liability Insurance for Nebraska employees.

2. **COMMERCIAL GENERAL LIABILITY INSURANCE AND COMMERCIAL AUTOMOBILE LIABILITY INSURANCE**

The Vendor shall take out and maintain during the life of this contract such Commercial General Liability Insurance and Commercial Automobile Liability Insurance as shall protect Vendor and any Subcontractor performing work covered by this contract from claims for damages for bodily injury, including death, as well as from claims for property damage, which may arise from operations under this contract, whether such operation be by the Vendor or by any Subcontractor or by anyone directly or indirectly employed by either of them, and the amounts of such insurance shall not be less than limits stated hereinafter.

The Commercial General Liability Insurance shall be written on an **occurrence basis**, and provide Premises/Operations, Products/Completed Operations, Independent Vendors, Personal Injury, and Contractual Liability coverage. **The policy shall include the State, and others as required by the contract documents, as Additional Insured(s). This policy shall be primary, and any insurance or selfinsurance carried by the State shall be considered secondary and non-contributory. The COI shall contain the mandatory COI liability waiver language found hereinafter.** The Commercial Automobile Liability Insurance shall be written to cover all Owned, Non-owned, and Hired vehicles.

| **REQUIRED INSURANCE COVERAGE** | |
|---|---|
| **COMMERCIAL GENERAL LIABILITY** | |
| General Aggregate | $2,000,000 |
| Products/Completed Operations Aggregate | $2,000,000 |
| Personal/Advertising Injury | $1,000,000 per occurrence |
| Bodily Injury/Property Damage | $1,000,000 per occurrence |
| Medical Payments | $10,000 any one person |
| Damage to Rented Premises (Fire) | $300,000 each occurrence |
| Contractual | Included |
| XCU Liability (Explosion, Collapse, and Underground Damage) | Included |
| Independent Vendors | Included |
| Abuse & Molestation | Included |
| ***If higher limits are required, the Umbrella/Excess Liability limits are allowed to satisfy the higher limit.*** | |
| **WORKER'S COMPENSATION** | |
| Employers Liability Limits | $500K/$500K/$500K |
| Statutory Limits- All States | Statutory - State of Nebraska |
| Voluntary Compensation | Statutory |

| | |
|---|---|
| **UMBRELLA/EXCESS LIABILITY** | |
| Over Primary Insurance | $5,000,000 per occurrence |
| **PROFESSIONAL LIABILITY** | |
| All Other Professional Liability (Errors & Omissions) | $3,000,000 Per Claim / Aggregate |
| **COMMERCIAL CRIME** | |
| Crime/Employee Dishonesty Including 3rd Party Fidelity | $1,000,000 |
| **CYBER LIABILITY** | |
| Breach of Privacy, Security Breach, Denial of Service, Remediation, Fines and Penalties | $5,000,000 |
| **MANDATORY COI SUBROGATION WAIVER LANGUAGE** | |
| "Workers' Compensation policy shall include a waiver of subrogation in favor of the State of Nebraska." | |
| **MANDATORY COI LIABILITY WAIVER LANGUAGE** | |
| "Commercial General Liability & Commercial Automobile Liability policies shall name the State of Nebraska as an Additional Insured and the policies shall be primary and any insurance or self-insurance carried by the State shall be considered secondary and non-contributory as additionally insured." | |

**3. EVIDENCE OF COVERAGE**

The Vendor shall furnish the Contract Manager, via email, with a certificate of insurance coverage complying with the above requirements prior to beginning work at:

RFP Number: 124528 ON
Name: Bradley Murphy, Procurement Contracts Officer
Agency: Department of Health & Human Services
Address: 301 Centennial Mall South Lincoln, NE 68509
E-Mail: bradley.murphy@nebraska.gov

These certificates or the cover sheet shall reference the solicitation number, and the certificates shall include the name of the company, policy numbers, effective dates, dates of expiration, and amounts and types of coverage afforded. If the State is damaged by the failure of the Vendor to maintain such insurance, then the Vendor shall be responsible for all reasonable costs properly attributable thereto.

Reasonable notice of cancellation of any required insurance policy must be submitted to the contract manager as listed above when issued and a new coverage binder shall be submitted immediately to ensure no break in coverage.

**4. DEVIATIONS**

The insurance requirements are subject to limited negotiation. Negotiation typically includes, but is not necessarily limited to, the correct type of coverage, necessity for Workers' Compensation, and the type of automobile coverage carried by the Vendor.

**K. ANTITRUST**

The Vendor hereby assigns to the State any and all claims for overcharges as to goods and/or services provided in connection with this contract resulting from antitrust violations which arise under antitrust laws of the United States and the antitrust laws of the State.

**L. CONFLICT OF INTEREST**

By submitting a solicitation response, vendor certifies that no relationship exists between the vendor and any person or entity which either is, or gives the appearance of, a conflict of interest related to this solicitation or project.

Vendor further certifies that vendor will not employ any individual known by vendor to have a conflict of interest nor shall vendor take any action or acquire any interest, either directly or indirectly, which will conflict in any manner or degree with the performance of its contractual obligations hereunder or which creates an actual or appearance of conflict of interest.

If there is an actual or perceived conflict of interest, vendor shall provide with its solicitation response a full disclosure of the facts describing such actual or perceived conflict of interest and a proposed mitigation plan for consideration.

The State will then consider such disclosure and proposed mitigation plan and either approve or reject as part of the overall solicitation response evaluation.

M. **STATE PROPERTY**

The Vendor shall be responsible for the proper care and custody of any State-owned property which is furnished for the Vendor's use during the performance of the contract. The Vendor shall reimburse the State for any loss or damage of such property; normal wear and tear is expected.

N. **SITE RULES AND REGULATIONS**

The Vendor shall use its best efforts to ensure that its employees, agents, and Subcontractors comply with site rules and regulations while on State premises. If the Vendor must perform on-site work outside of the daily operational hours set forth by the State, it must make arrangements with the State to ensure access to the facility and the equipment has been arranged. No additional payment will be made by the State on the basis of lack of access, unless the State fails to provide access as agreed to in writing between the State and the Vendor.

O. **ADVERTISING**

The Vendor agrees not to refer to the contract award in advertising in such a manner as to state or imply that the company or its goods or services are endorsed or preferred by the State. Any publicity releases pertaining to the project shall not be issued without prior written approval from the State.

P. **NEBRASKA TECHNOLOGY ACCESS STANDARDS (Nonnegotiable)**

1. The State of Nebraska is committed to ensuring that all information and communication technology (ICT), developed, leased, or owned by the State of Nebraska, affords equivalent access to employees, program participants and members of the public with disabilities, as it affords to employees, program participants and members of the public who are not persons with disabilities.
2. By entering into this Contract, Vendor understands and agrees that if the Vendor is providing a product or service that contains ICT, as defined in subsection 3 below and such ICT is intended to be directly interacted with by the user or is public facing, such ICT must provide equivalent access, or be modified during implementation to afford equivalent access, to employees, program participants, and members of the public who have and who do not have disabilities. The Vendor may comply with this section by complying with Section 508 of the Rehabilitation Act of 1973, as amended, and its implementing standards adopted and promulgated by the U.S. Access Board.
3. ICT means information technology and other equipment, systems, technologies, or processes, for which the principal function is the creation, manipulation, storage, display, receipt, or transmission of electronic data and information, as well as any associated content. Vendor hereby agrees ICT includes computers and peripheral equipment, information kiosks and transaction machines, telecommunications equipment, customer premises equipment, multifunction office machines, software, applications, web sites, videos, and electronic documents. For the purposes of these assurances, ICT does not include ICT that is used exclusively by a Vendor.

Q. **DISASTER RECOVERY/BACK UP PLAN**

The Vendor shall have a disaster recovery and back-up plan, of which a copy should be provided upon request to the State, which includes, but is not limited to equipment, personnel, facilities, and transportation, in order to continue delivery of goods and services as specified under the specifications in the contract in the event of a disaster.

R. **DRUG POLICY**

Vendor certifies it maintains a drug free workplace environment to ensure worker safety and workplace integrity. Vendor agrees to provide a copy of its drug free workplace policy at any time upon request by the State.

S. **WARRANTY**

Despite any clause to the contrary, the Vendor represents and warrants that its services hereunder shall be performed by competent personnel and shall be of professional quality consistent with generally accepted industry standards for the performance of such services and shall comply in all respects with the requirements of this Agreement. For any breach of this warranty, the Vendor shall, for a period of ninety (90) days from performance of the service, perform the services again, at no cost to the State, or if Vendor is unable to perform the services as warranted, Vendor shall reimburse the State all fees paid to Vendor for the unsatisfactory services. The rights and remedies of the parties under this warranty are in addition to any other rights and remedies of the parties provided by law or equity, including, without limitation actual damages, and, as applicable and awarded under the law, to a prevailing party, reasonable attorneys' fees and costs.

T. **TIME IS OF THE ESSENCE**

Time is of the essence with respect to Vendor's performance and deliverables pursuant to this Contract.

U. **BUSINESS ASSOCIATE PROVISIONS**

1. BUSINESS ASSOCIATE. "Business Associate" shall generally have the same meaning as the term "business associate" at 45 CFR § 160.103, and in reference to the party to the Contract, shall mean Contractor.

2. COVERED ENTITY. "Covered Entity" shall generally have the same meaning as the term "covered entity" at 45 CFR § 160.103, and in reference to the party to the Contract, shall mean DHHS.

3. HIPAA RULES. "HIPAA Rules" shall mean the Privacy, Security, Breach Notification, and Enforcement Rules at 45 CFR Part 160 and Part 164.

4. SECURITY INCIDENT. "Security Incident" shall mean the attempted or successful unauthorized access, use, disclosure, modification, or destruction of information, or interference with system operations in an information system.

5. OTHER TERMS. The following terms shall have the same meaning as those terms in the HIPAA Rules: Breach, Data Aggregation, Designated Record Set, Disclosure, Health Care Operations, Individual, Minimum Necessary, Notice of Privacy Practices, Protected Health Information, Required by Law, Secretary, Subcontractor, Unsecured Protected Health Information, and Use.

6. THE CONTRACTOR shall do the following:
   a. Not use or disclose Protected Health Information other than as permitted or required by the Contract or as required by law. Contractor may use Protected Health Information for the purposes of managing its internal business processes relating to its functions and performance under the Contract. Use or disclosure must be consistent with DHHS' minimum necessary policies and procedures.
   b. Implement and maintain appropriate administrative, physical, and technical safeguards to prevent access to, and the unauthorized use and disclosure of Protected Health Information. Comply with Subpart C of 45 CFR Part 164 with respect to electronic Protected Health Information, to prevent use or disclosure of Protected Health Information other than as provided for in the Contract, and assess potential risks and vulnerabilities to the individual health data in its care and custody and develop, implement, and maintain reasonable security measures.
   c. To the extent Contractor is to carry out one or more of the DHHS' obligations under Subpart E of 45 CFR Part 164, comply with the requirements of Subpart E that apply to DHHS in the performance of such obligations. Contractor may not use or disclosure Protected Health Information in a manner that would violate Subpart E of 45 CFR Part 164 if done by DHHS.
   d. In accordance with 45 CFR §§ 164.502(e)(1)(ii) and 164.308(b)(2), if applicable, ensure that any agents and subcontractors that create, receive, maintain, or transmit Protected Health Information received from DHHS, or created by or received from Contractor on behalf of DHHS, agree in writing to the same restrictions, conditions, and requirements relating to the confidentiality, care, custody, and minimum use of Protected Health Information that apply to the Contractor with respect to such information.
   e. Obtain reasonable assurances from the person to whom the information is disclosed that the information will remain confidential and be used or further disclosed only as required by law or for the purposes for which it was disclosed to the person, and that the person shall notify Contractor of any instances of which the person is aware that the confidentiality of the information has been breached.
   f. Contractor shall maintain and make available within fifteen (15) days in a commonly used electronic format:
      i. Protected Health Information to DHHS, as necessary to satisfy DHHS' obligations under 45 CFR § 164.524; ii. Any amendment(s) to Protected Health Information, as directed or agreed to by DHHS, pursuant to 45 CFR § 164.526, or take other measures as necessary to satisfy DHHS' obligations under 45
      CFR § 164.526; iii. The information required to provide an accounting of disclosures to DHHS, as necessary to satisfy DHHS' obligations under 45 CFR § 164.528.
   g. Make its internal practices, books, and records relating to the use and disclosure of Protected Heath Information received from, or created or received by Contractor on behalf of DHHS available to the Secretary or DHHS for purposes of determining compliance with the HIPAA Rules. Contractor shall provide DHHS with copies of the information it has made available to the Secretary at the same time as it was made available to the Secretary.
   h. Report to DHHS within fifteen (15) days of when Contractor becomes aware, any unauthorized use or disclosure of Protected Health Information made in violation of the Contract or the HIPAA Rules, including any security incident that may put electronic Protected Health Information at risk. Contractor shall, as

instructed by DHHS, take immediate steps to mitigate any harmful effect of such unauthorized disclosure of Protected Health Information pursuant to the conditions of the Contract through the preparation and completion of a written Corrective Action Plan that is subject to review and approval by DHHS. Contractor shall be responsible for all breach notifications in accordance with HIPAA rules and regulations, and all costs associated with security incident investigations and breach notification procedures.

i. Business Associate shall indemnify, defend, and hold harmless DHHS for any financial loss as a result of claims brought by third parties and which are caused by the failure of Contractor, its officers, directors, agents, or subcontractors to comply with the terms of the Contract, or for penalties imposed by the HHS Office of Civil Rights for any violations of the HIPAA Rules caused by Contractor, its officers, directors, agents, or subcontractors. Additionally, Contractor shall indemnify DHHS for any time and expenses it may incur from breach notifications that are necessary under the HIPAA Breach Notification Rule, which are caused by a failure of Contractor, its officers, directors, agents, or subcontractors to comply with the terms of the Contract.

7. TERMINATION.
   a. DHHS may immediately terminate the Contract, and any and all associated contracts, if DHHS determines that Contractor has violated a material term of the Contract.
   b. Within thirty (30) days of expiration or termination of the Contract, or as agreed, unless Contractor requests and DHHS authorizes a longer period of time, Contractor shall return, or at the written direction of DHHS, destroy all Protected Health Information received from DHHS (or created or received by Contractor on behalf of DHHS) that Contractor still maintains in any form, and shall retain no copies of such Protected Health Information. Contractor shall provide a written certification to DHHS that all such Protected Health Information has been returned or destroyed (if so instructed), whichever is deemed appropriate. If such return or destruction is determined by DHHS to be infeasible, Contractor shall use such Protected Health Information only for purposes that makes such return or destruction infeasible, and the provisions of the Contract shall survive with respect to such Protected Health Information.
   c. The obligations of the Contractor under this Termination section shall survive the termination of the Contract.

## VI.A.3.b.3 Section IV – Payment [RFP IV]

**REQUIREMENT: RFP Section IV**

Conduent's Section IV – Payment is provided on the following pages.

# IV. PAYMENT

Bidder should read the Payment clauses within this section and must initial either "Accept All Terms and Conditions Within Section as Written" or "Exceptions Taken to Payment clauses Within Section as Written" in the table below. If exception is not taken to a provision, it is deemed accepted as stated. If the bidder takes any exceptions, they must provide the following within the "Exceptions" field of the table below (Bidder may provide responses in separate attachment if multiple exceptions are taken):

1. The specific clause, including section reference, to which an exception has been taken;
2. An explanation of why the bidder took exception to the clause; and
3. Provide alternative language to the specific clause within the solicitation response.

By signing the solicitation, bidder agrees to be legally bound by all the accepted terms and conditions, and any proposed alternative terms and conditions submitted with the solicitation response. The State reserves the right to negotiate rejected or proposed alternative language. If the State and bidder fail to agree on the final Terms and Conditions, the State reserves the right to reject the solicitation response. The State reserves the right to reject solicitation responses that attempt to substitute the bidder's commercial contracts and/or documents for this solicitation.

| Accept All Payment Clauses Within Section as Written (Initial) | Exceptions Taken to Payment Clauses Within Section as Written (Initial) | Exceptions: (Bidder must note the specific clause, including section reference, to which an exception has been taken, an explanation of why the bidder took exception to the clause, and provide alternative language to the specific clause within the solicitation response.) |
|---|---|---|
| AKS | | |

A. **PROHIBITION AGAINST ADVANCE PAYMENT (Nonnegotiable)**
Pursuant to Neb. Rev. Stat. § 81-2403, "[no goods or services shall be deemed to be received by an agency until all such goods or services are completely delivered and finally accepted by the agency."

B. **TAXES (Nonnegotiable)**
The State is not required to pay taxes and assumes no such liability as a result of this Solicitation. The Vendor may request a copy of the Nebraska Department of Revenue, Nebraska Resale or Exempt Sale Certificate for Sales Tax Exemption, Form 13 for their records. Any property tax payable on the Vendor's equipment which may be installed in a state-owned facility is the responsibility of the Vendor.

C. **INVOICES**
Invoices for payments must be emailed by the Vendor to the agency requesting the services with a detailed report of the services, deliverables and/or staff hours performed during the month. Include full calculations for invoiced amounts to support payment. **Invoices must be emailed to: DHHS.MedicaidDrugRebate@nebraska.gov**
The terms and conditions included in the Vendor's invoice shall be deemed to be solely for the convenience of the parties. No terms or conditions of any such invoice shall be binding upon the State, and no action by the State, including without limitation the payment of any such invoice in whole or in part, shall be construed as binding or stopping the State with respect to any such term or condition, unless the invoice term or condition has been previously agreed to by the State as an amendment to the contract. **The State shall have forty-five (45) calendar days to pay after a valid and accurate invoice is received by the State.**

D. **INSPECTION AND APPROVAL**
Final inspection and approval of all work required under the contract shall be performed by the designated State officials.
The State and/or its authorized representatives shall have the right to enter any premises where the Vendor or Subcontractor duties under the contract are being performed, and to inspect, monitor or otherwise evaluate the work being performed. All inspections and evaluations shall be at reasonable times and in a manner that will not unreasonably delay work.

E. **PAYMENT (Nonnegotiable)**
Payment will be made by the responsible agency in compliance with the State of Nebraska Prompt Payment Act (See Neb. Rev. Stat. § 81-2403). The State may require the Vendor to accept payment by electronic means such as ACH deposit. In no event shall the State be responsible or liable to pay for any goods and services provided by the Vendor prior to the Effective Date of the contract, and the Vendor hereby waives any claim or cause of action for any such goods or services.

F. **LATE PAYMENT (Nonnegotiable)**
The Vendor may charge the responsible agency interest for late payment in compliance with the State of Nebraska Prompt Payment Act (See Neb. Rev. Stat. §§ 81-2401 through 81-2408).

G. **SUBJECT TO FUNDING / FUNDING OUT CLAUSE FOR LOSS OF APPROPRIATIONS (Nonnegotiable)**
The State's obligation to pay amounts due on the Contract for fiscal years following the current fiscal year is contingent upon legislative or federal appropriation of funds. Should said funds not be appropriated, the State may terminate the contract with respect to those payments for the fiscal year(s) for which such funds are not appropriated. The State will give the Vendor reasonable written notice prior to the effective date of termination. All obligations of the State to make payments after the termination date will cease. The Vendor shall be entitled to receive just and equitable compensation for any authorized work which has been satisfactorily completed as of the termination date. In no event shall the Vendor be paid for a loss of anticipated profit.

H. **RIGHT TO AUDIT (First Paragraph is Nonnegotiable)**
The State shall have the right to audit the Vendor's performance of this contract upon a thirty (30) days' written notice. Vendor shall utilize generally accepted accounting principles, and shall maintain the accounting records, and other records and information relevant to the contract (Information) to enable the State to audit the contract. (Neb. Rev. Stat. § 84-304 et seq.) The State may audit, and the Vendor shall maintain, the Information during the term of the contract and for a period of five (5) years after the completion of this contract or until all issues or litigation are resolved, whichever is later. The Vendor shall make the Information available to the State at Vendor's place of business or a location acceptable to both Parties during normal business hours. If this is not practical or the Vendor so elects, the Vendor may provide electronic or paper copies of the Information. The State reserves the right to examine, make copies of, and take notes on any Information relevant to this contract, regardless of the form or the Information, how it is stored, or who possesses the Information. Under no circumstance will the Vendor be required to create or maintain documents not kept in the ordinary course of Vendor's business operations, nor will Vendor be required to disclose any information, including but not limited to product cost data, which is confidential or proprietary to Vendor.

The Parties shall pay their own costs of the audit unless the audit finds a previously undisclosed overpayment by the State. If a previously undisclosed overpayment exceeds three (3%) percent of the total contract billings, or if fraud, material misrepresentations, or non-performance is discovered on the part of the Vendor, the Vendor shall reimburse the State for the total costs of the audit. Overpayments and audit costs owed to the State shall be paid within ninety (90) days of written notice of the claim. The Vendor agrees to correct any material weaknesses or condition found as a result of the audit.

# VI.A.3.c Appendix C: Organizational Conflict of Interest Assessment [RFP 124528 ON]

The bidder is Conduent State Healthcare, LLC ("Conduent"). Conduent has evaluated its business relationships and determined that no organizational conflict of interest exists with respect to RFP Number 124528 ON and this procurement.

However, because the RFP's disclosure requirement extends to relationships that may create the appearance of a conflict of interest, Conduent is providing the following information identified during our assessment in the spirit of full transparency to the State even though Conduent does not believe these relationships create an actual conflict of interest or the appearance of a conflict of interest for Conduent.

## Relationships Evaluated

First, [redacted]

Second, Conduent evaluated its relationship with [redacted]

## Basis for no Organizational Conflict of Interest

The following considerations support Conduent's conclusion that the evaluated relationships do not create an organizational conflict of interest with respect to this procurement.

Conduent has concluded that these relationships do not create an organizational conflict of interest. Regarding the Affiliate, the Affiliate and Conduent operate independently and do not share personnel, systems, data, or reporting lines. The Affiliate does not have access to manufacturer rebate pricing, dispute, or utilization data associated with the Nebraska Medicaid Drug Rebate Program. Regarding the part-time consultant, Conduent does not share systems or data with [redacted], and the part-time consultant [redacted].

The Nebraska Medicaid Drug Rebate scope does not include manufacturer rebate contracting services for supplemental rebates nor does Conduent have contracting relationships with manufacturers currently. Conduent will administer the Medicaid Drug Rebate operational scope in accordance with the State's direction and does not represent interests that are adverse to the State in the administration of the Medicaid Drug Rebate Program. Accordingly, Conduent is providing this information in response to the RFP's disclosure requirements and does not identify a mitigation plan as necessary.

# VI.A.3.d Appendix D: User License Agreement [RFP 124528 ON]

## Web Site Terms of Use

Conduent Inc. ("Conduent") makes this Site available in accordance with these Web Site Terms of Use ("Terms"). These Terms govern your access to and use of this Site. By accessing this Site you accept and agree to comply with all of the Terms. If you do not agree with these Terms, please do not use this Site and exit immediately. © Copyright 1994-2010 Conduent Inc. All rights Reserved. Conduent® and the Conduent design are trademarks of Conduent Marketing LP in the US and/or other Countries.

**Information Submitted to Conduent.** Other than personally identifiable health information as provided in the Conduent Online Privacy Statement, any other information sent to Conduent through this Site will be treated as non-confidential. You grant to Conduent an unrestricted, royalty-free, irrevocable license to use, reproduce, display, perform, modify, transmit and distribute the non-confidential information. You agree that Conduent is entitled to use for any purpose whatsoever any ideas, concepts, know-how or techniques that you send, without any obligation of compensation to you or any other person. Your personally identifiable information that you submit will be treated in accordance with the Conduent Online Privacy Statement that accompanies this Site or as more specifically described in another Conduent web site you may access.

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## VI.A.3.e Appendix E: Written Request for Protection of Proprietary Information

### Written Request for Protection of Proprietary Information from Public Disclosure

In order to respond to the RFP requirements, Conduent has included various information in its proposal that Conduent believes to be confidential, proprietary, trade secret, and/or otherwise exempt from public disclosure under applicable public records law, trade secret law, or both. Each portion of Conduent’s proposal that contains this information is identified as follows: the page number(s) and a statement that sets out one or more of the reasons Conduent believes the portion of the proposal to be exempt from public disclosure under applicable public records

law, trade secret law, or both, are identified in the table below, the pages in the proposal that contain such information are identified in the footer as “Confidential, Proprietary, Trade Secret, and/or Otherwise Exempt Information”, and the specific content is identified with a light orange background when only portions of the page are believed to be exempt. Conduent is including this information solely for the purpose of this specific procurement.

> *Disclosure of the identified information would provide an actual business advantage to Conduent’s named competitors, including but not limited to Prime Therapeutics and Gainwell Technologies, LLC. These competitors participate in the same or similar public sector healthcare, Medicaid, pharmacy benefit, claims processing, and technology services procurements. If disclosed, the identified information could allow these competitors to analyze Conduent’s solution approach, staffing model, implementation methodology, pricing assumptions, operational processes, risk mitigation strategies, and other competitively sensitive proposal content. With access to this information, Prime Therapeutics and/or Gainwell Technologies, LLC could use Conduent’s non-public strategies and proposal-specific approaches to refine their own technical solutions, adjust pricing or staffing assumptions, anticipate Conduent’s competitive positioning, and improve future proposal responses in direct competition with Conduent. This would provide an actual, non-speculative competitive advantage by enabling those competitors to benchmark against, replicate, or undercut Conduent’s approach in future procurements.*

Therefore, Conduent respectfully requests, in writing, that the State, soliciting agency, and procurement officer limit access to these portions of the proposal to their employees who are involved in the evaluation of bidder proposals and award of the contract that will result from this RFP and otherwise protect these portions of the proposal from disclosure in accordance with applicable public records and trade secret law. This includes notifying Conduent promptly in the event that a third-party requests any of the information included in these portions of the proposal and providing Conduent an opportunity to protect the information from unauthorized disclosure.



Submitted by: **Conduent State Healthcare, LLC**

CONDUENT

**Cost Sheet**

# Medicaid Drug Rebate System (MDR)

## for the State of Nebraska, Department of Health and Human Services (DHHS)

Due Date: **August 6, 2026** | RFP Number: **124528 ON**

Portions of this proposal contain proprietary information, ideas, know-how, concepts, processes, and trade secrets that are the sole property of Conduent. Pages containing proprietary content are designated in the footer as "PROPRIETARY INFORMATION" and the specific content is identified with a light orange background, when only portions of the page are protected. If the entire page is considered Proprietary, the footer will read "This entire page PROPRIETARY INFORMATION." The proprietary contents of this proposal are intended solely for use in the procurement process and may not be disclosed except to persons who are involved in the evaluation of the proposal or award of the contract. The contents may not be duplicated, used, or disclosed in whole or in part for any purpose except the procurement process. Release of Conduent proprietary, confidential, and trade secret information would place Conduent at a serious and irreparable competitive disadvantage in future procurements by providing competitors with information that Conduent maintains strictly confidential and which is unavailable to any third-party except under restrictions contained in a nondisclosure agreement or protections that cover this information under applicable law. If a third-party makes a request for disclosure of any of the contents of this proposal, please notify Conduent immediately so that Conduent will have an opportunity to provide assistance in protecting the proprietary contents of this proposal from unauthorized disclosure.

# VI.A.4 Cost Sheet [RFP VI.A.4 ]

**REQUIREMENT: RFP Section VI.A.4**

Bidders shall complete and submit the Cost Sheet as a separate file with their Solicitation Response. Specific instructions on how to complete the Cost Sheet are outlined in the document. Place in a separate electronic file labeled “RFP 124528 ON Cost Sheet”

Conduent provides our Cost Sheet form on the following pages.

# Cost Sheet
## RFP#124528 ON
## Medicaid Drug Rebate System
## State of Nebraska, Department of Health and Human Services

Bidder Name: Conduent

**Important Instructions:** Bidders are to complete all fields highlighted in yellow.

Do not alter existing format or content within the Cost Sheet. However, if Bidder identifies that other items are essential in **Part I** and/or **Part II** to create full functionality, and meet the requirements as outlined in the RFP document and any related attachments, then additional lines may be inserted as needed. Such additional lines must be included in **Part I and Part II** pricing and be reflected in the Total Overall Cost. Any inclusion of additional lines must still conform within the stated percentages as outlined in **Part I** and follow the prescribed format as provided. **Important:** In case of a mathematical error in extension of price, unit price shall govern.

Prices submitted on the cost sheet once accepted by the DHHS shall remain fixed for the first five years of the contract.

Please indicate the "Grand Total" for the Project Requirements / Milestones and Operation Requirements (Initial and Renewals), this amount shall equal the sum of the Total for both **Part I** and **Part II**. "Grand Total" $ 18,899,999.99 . Do not include any costs for **Part III** in the **"**Grand Total", as these sections are not included in the cost evaluation.

### Part I: PROJECT REQUIREMENTS / MILESTONES

Project section requirements as outlined in Section (V) of the Request for Proposal (RFP) document and any related attachments. Bidder to provide pricing for each of the project requirements/milestones categories listed. The sum of all project requirement categories listed directly below constitutes the **Part I – Total**. Important: Bidders are to ensure that allocation of their percentages is based on the % provided for each category and that the total of all categories within **Part I** does not exceed 100%.

| Project Requirements / Milestones | % Breakdown by Milestone | Number of Units | Unit of Measure (UOM) | Cost (Unit Price) |
|---|---|---|---|---|
| **Requirements and Design Milestone (Section V.(I)(1)(a))** | **20%** of Implementation fees | 1 | Each | $ 309,930.55 |
| **Development and Testing Milestone (Section V.(I)(1)(b))** | **20%** of Implementation fees | 1 | Each | $ 309,930.55 |
| **Data/File Conversion and Migration Milestone (Section V.(I)(1)(c))** | **20%** of Implementation fees | 1 | Each | $ 309,930.55 |
| **Operational Readiness Milestone (Section V.(I)(1)(d))** | **20%** of Implementation fees | 1 | Each | $ 309,930.55 |
| **Certification Milestone (Section V.(I)(1)(e)** | **20%** of Implementation fees | 1 | Each | $ 309,930.55 |
| **Project Requirements / Milestones – Total (Part I)** | | | | $ 1,549,652.75 |

*(Remainder of this page intentionally left blank)*

# Cost Sheet
## RFP#124528 ON
## Medicaid Drug Rebate System
## State of Nebraska, Department of Health and Human Services

## Part II: OPERATION REQUIREMENTS AND RENEWALS

Bidder's price for annual operations shall include all associated costs or fees (including but not limited to subscriptions costs).

**Important:** Do not include statements in the RFP proposal submittals, attachments, etc. indicating that there will be additional fees which are not included in the table below. The sum of the extended cost (Unit of Measure x Monthly Price) constitutes the extended Annual Cost. **Both the Initial Term and Renewal Totals will be evaluated for points associated with Cost.**

### A. OPERATION REQUIREMENTS (INITIAL TERM OF FIVE YEARS)
(Note: These items would be paid for on a monthly basis).

**Part II Operations and Customer Support costs will begin in the first month following completion of Part I and remain fixed for the duration of the initial term of five years.**

| Operations Requirements | Estimated Contract Term | Unit of Measure (UOM) | Cost (Monthly Price) | Extended Annual Cost |
|---|---|---|---|---|
| Operation Requirements (Section V.(I)(2)) | 48 months | Monthly | $ 186,621.94 | $ 2,239,463.28 |
| Customer Support Requirements (Section V.(I)(2)) | 48 months | Monthly | $ 17,307.86 | $ 207,694.32 |
| | | | **Operations Requirements – (Initial Term)** | $9,788,630.40 |

### B. OPERATION REQUIREMENTS (RENEWAL PERIOD OF THREE YEARS)
(Note: These items would be paid for on a monthly basis).

| Operations Requirements | Contract Term | Unit of Measure (UOM) | Cost (Monthly Price) | Extended Annual Cost |
|---|---|---|---|---|
| Operation Requirements (Section V.(I)(2)) | 36 months | Monthly | $ 192,220.59 | $ 2,306,647.08 |
| Customer Support Requirements (Section V.(I)(2)) | 36 months | Monthly | $ 17,827.10 | $ 213,925.20 |
| | | | **Operations Requirements – (Renewals)** | $7,561,716.84 |
| | | | **Operations Requirements – TOTAL (Initial + Renewals) (Part II)** | $17,350,347.24 |

## Part III: Optional Services Miscellaneous Support and Enhancements
(Do **not** include these amounts in the "Grand Total" associated with Part I and Part II)

DHHS acknowledges that during the duration of the contract there may be state directed System Enhancements-Change orders necessary to comply with evolving federal or state regulations, as well as business needs. DHHS will provide a written request for any system changes. The vendor must provide a written scope of work which includes the technical and/or business requirement changes, inclusive of the schedule and costs associated with the system enhancement requested by the state, for the state's consideration of approval. Once approved and after the system enhancement has been delivered, the vendor must submit a written request for deliverable acceptance of the system enhancement and obtain state approval prior to billing the system enhancement.

| Optional Services | Contract Term | Unit of Measure (UOM) | Cost (Unit Price) | Extended Cost |
|---|---|---|---|---|
| System Enhancements-Change order pool | Base | 1 hour | $ 150.00 | $ 150.00 |
| System Enhancements-Change order pool | Optional renewals | 1 hour | $ 175.00 | $ 175.00 |
| **Labor Costs (Utilizing the Hourly Rates table below)** | **Breakdown from table below** | | | |
| **Material Costs (markup from retail/wholesale)** | **_____%** | | | |
| **Equipment Costs** | **_____% (can insert limits on this percentage)** | | | |
| **Administrative/Overhead Costs** | **_____% (Markup cannot exceed 10%)** | | | |
| | | | **Optional Services – Grand Total** | |

# Cost Sheet

## RFP#124528 ON

## Medicaid Drug Rebate System

## State of Nebraska, Department of Health and Human Services

**Hourly Rates for Miscellaneous Support and Enhancements (beyond RFP/Contract requirements)**

*The Bidder should provide the Title/Role with each respective hourly rate to perform additional services as requested and approved by DHHS during the duration of the contract term and any applicable renewals.

| Title / Role such as, but not limited to: | Hourly Rate |
|---|---|
| Director, Account Management | $ 175.00 |
| Project Manager | $ 150.00 |
| CMS Certification Lead | $ 150.00 |
| Technical Delivery Lead | $ 150.00 |
| Senior Business Analyst | $ 100.00 |
| Business Analyst | $ 150.00 |
| Reporting Analyst | $ 125.00 |
| Developer | $ 150.00 |
| Quality Assurance | $ 125.00 |
| Security | $ 125.00 |
| Database Administrator | $ 150.00 |
| Infrastructure | $ 125.00 |
| ---------- | $ ---------- |
| | $ |
| | $ |
| | $ |
| | $ |
| | $ |
| | $ |
| | $ |
| | $ |

**Bidder may add additional lines as needed.*