

## Draft Pending Adoption

Attachment One  
SERFF Advisory Board  
3/29/21

Draft: 11/18/20

SERFF Advisory Board  
Virtual Meeting (*in lieu of meeting at the 2020 Fall National Meeting*)  
November 5, 2020

The SERFF Advisory Board met Nov. 5, 2020. The following Advisory Board members participated: Barbara D. Richardson, Chair (NV); Lori K. Wing-Heier (AK); Alan McClain represented by William Lacy (AR); Vicki Schmidt and Julie Holmes (KS); Chlora Lindley-Myers (MO); Mike Causey represented by Timothy Johnson (NC); Birny Birnbaum (Center for Economic Justice—CEJ); Rachel S. Benton (Bright Health); Theresa E. Boyce (Chubb Group); Andrea Davey (Athene Annuity and Life Company); and Karen Schutter (Interstate Insurance Product Regulation Commission—Compact).

### 1. Reviewed its Summer National Meeting Minutes

There were no changes to the Advisory Board's July 28 minutes (Attachment One).

### 2. Received an Updated Report on SERFF Activity

Bridget Kieras (NAIC) and Alex Rogers (NAIC) reported on System for Electronic Rate and Form Filing (SERFF) activity (Attachment Two). The SERFF team has introduced one release since the report at the Summer National Meeting. This release completed the second phase of the SERFF Billing project. The updates included the ability for the NAIC to collect fees that are applicable for the Form Filing Review Tool pilot. The release accommodates the pilot project that Texas is now undertaking. The fees will be assessed at the submission of applicable filings, and they will be collected via Automated Clearing House (ACH) Debit. There is a scheduled release on Nov. 5, which will complete the third phase of the billing enhancements project. The updates will include the ability for the NAIC transaction fees to be paid upon submission with a payment method of credit card if the instance is enabled for credit card payments. The release will also include a label change for all Life, Accident, and Health (A&H)/Annuity and Credit filings from "Implementation Date" to "Effective Date" at the direction of the Speed to Market (EX) Working Group. The final phase of the SERFF Billing project is underway; this work will transition all NAIC transaction fees from invoicing and prepaid blocks to payment at the time of submission via ACH Debit or credit card. This work is slated to be completed in the first quarter of 2021.

The SERFF Product Steering Committee (PSC) met Aug. 5 and heard updates on completed and in-progress work, updates on the road map for 2020, and updates on the SERFF Assessment project.

SERFF has received nearly 435,000 transactions year-to-date (YTD) through October. Plan Management saw an increase in submissions by 30% over what is projected; 24,000 plan transactions were submitted thus far as the 2021 plan year concludes. The SERFF Marketing team participated in the NAIC's Insurance Summit. SERFF staff hosted both industry and state insurance regulator sessions. The Implementation team is currently preparing for the Association of Insurance Compliance Professionals' (AICP's) annual conference, which will now be virtual. The team will be hosting a session regarding changes coming to the SERFF platform, as well as tips and tricks.

The SERFF Implementation team has been heavily involved in the transition of users to the new Electronic Funds Transfer (EFT) Self Service module. This has been an integral piece of the SERFF Billing project, which will continue to streamline processes for industry users and support staff. The Marketing team has been sending out communication to customers over the past few months to ensure that files are prepared for the changes prior to a release.

Effective Jan. 1, the Speed to Market (EX) Working Group adopted new changes to the uniform product coding matrices (PCMs). The changes include two new sub-types of insurance (TOIs) for life, accident and health. The Implementation team will begin outreach over the next few weeks with the states that would like to enable these changes.

The Filing Solutions department completed the work to create a state collaboration space using SharePoint Online for the Big Data (EX) Working Group, which is ready for production use. The tool allows state insurance regulators to communicate with each other and the NAIC actuarial modeling team about companies' property/casualty (P/C) rate classification models and the states' questions about the model. Currently, there are 21 contracts signed. The team hosted a session regarding the Big Data

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Sharing tool during the NAIC Insurance Summit. This included a demonstration of the tool, as well as NAIC services to review rate models. The team continues to analyze the ability to integrate the tool with SERFF for automation.

SERFF Filing Access (SFA) continues to see significant usage with more than 1,287,000 searches in the application through September. The Marketing and Implementation teams continue outreach in efforts to transition additional states.

Ms. Boyce asked for clarification on the charged fees for form filing on the Texas pilot. Joy E. Morrison (NAIC) explained how the charge is applied and asked Ms. Boyce to contact the NAIC Service Desk for follow-up.

Ms. Boyce asked for clarification about ACH Debit setup in the new billing system. Mr. Rogers confirmed that a filer would pay at submission, utilizing the same banking information that also pays the state transaction fee. He stated that the payment transition will occur at the completion of the Billing project, which may not coincide with Jan. 1. The transition would likely complete in the first quarter of 2021.

Commissioner Richardson inquired about the credit card handling processes. Ms. Morrison confirmed that SERFF uses a third-party provider to process the credit card payments, and the NAIC does not hold or store any credit card information. She confirmed that any issues—i.e., refund requests or charge disputes—that arise with credit card transactions are handled by the third-party interface. She also confirmed that the NAIC has access to the same system as the third-party interface and could issue refunds if necessary. Ms. Kieras added that while credit card implementation is new for SERFF, there are other NAIC applications that have implemented credit card transactions for a few years.

Ms. Boyce asked for confirmation about ACH Debit account setup in the new SERFF system. Mr. Rogers confirmed that once ACH Debit is setup in SERFF, that same banking information can be utilized and applied in the new billing system.

### 3. Received an Update on SERFF-Related Strategic Projects

Ms. Morrison reported on three SERFF-related strategic projects. The first project is the SERFF Billing Enhancements project (Attachment Three) as of Oct. 1. Phase One of this project was to allow customers to set up their own EFT information in the Common Electronic Commerce Initiative (CECI) centralized e-commerce application. That work was completed, and it has been released into production. Phase Two was the Form Filing Review Tool pilot. That work was completed in late July, and it was turned on in production on Sept. 1. This allowed the NAIC to charge a fee to companies submitting a form filing in Texas to offset the cost of the vendor tool that the Texas Department of Insurance (TDI) is using for this pilot. Phase Three has completed and will be released on Nov. 5. This includes a credit card feature to help streamline payments for Pay-As-You-Go (PAYG) filers who pay from an invoice every month. This portion of the project was more complex than originally estimated due to development efforts and loss of an internal resource. A second project change request (PCR) will likely be submitted; and due to similar setbacks with the credit card work, Phase Four of this project will be delayed roughly a month. Once established, companies will pay for filings at submission using ACH Debit. There is not a lot of impact here to the state insurance regulators, but this is a big improvement for companies and NAIC staff.

The second project is the SERFF Filing Review Tools Pilot (Attachment Four), which was bundled into the larger SERFF Billing project. This project has been completed and finished on time and under budget. This work was completed and turned on in production on Sept. 1.

Ms. Boyce asked whether customers will see additional charges if other states utilize this tool in the future. Ms. Morrison stated that if other states use this tool in the future, additional charges could be applicable, but that will be evaluated post-pilot.

The third and final project covers SERFF Plan Management 2021 (Attachment Five). This fiscal has not yet been approved, but it is expected to be approved with the 2021 budget process. This project has two main components: 1) to automate the transmission of the Uniform Rate Review Template (URRT) to the federal Centers for Medicare & Medicaid Services (CMS); and 2) to automate the transfer of financial management data reports and the Public Use Files. This work is expected to be completed with consultant resources to preserve NAIC staff for SERFF Modernization work. This project will plan to begin in January 2021, complete in December 2021, and cost just under \$300,000.

### 4. Received an Update on SERFF's Budget

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Donna L. Powers (NAIC) presented a review of the NAIC financials (Attachment Six) as they relate to SERFF. SERFF is expected to earn approximately \$6.9 million in 2021. This revenue is made up of \$541,916 in license fees; \$172,000 in surcharges from the Texas pilot; \$4,695,136 in transaction fees; and \$1,525,323 in data hosting fees.

Mr. Birnbaum asked for rationale clarification for the \$25,000 cap for data hosting customers. Ms. Powers stated that the rationale is twofold: 1) the NAIC already has a cap on the database filing fee, and it is following that model to a certain degree; and 2) one of the previous data hosting vendors utilized a cap in their model, which motivated the NAIC to create a blended pricing structure.

Relative to expenses, Ms. Powers said SERFF does not have a budget or cost center that tracks expenses for it alone. The Technology team that supports the SERFF application is part of the Filing Solutions department within the Information Technology Group (ITG). The Filing Solutions department is its own cost center and includes 46 full-time employees. Several staff who work on the SERFF application also work on several other major projects for which the department is responsible. In addition, new this year, customer support of the application is being transitioned over to the Strategic Business Initiatives (SBI) team, which is a completely different cost center outside of the ITG. As such, expenses shown are a blend of direct costs that are incurred in the Filing Solutions budget and a small portion of the SBI budget. Those expenses include salaries, credit card fees, professional services, and staff travel. Based on an assessment of the workload in October, the Filing Solutions staff spent an estimated 27.8% of its time supporting SERFF, which equates to just under 13 full-time positions dedicated to SERFF year-round. That information is used to look at other parts of the NAIC that support that staff (e.g., taxes, pensions, employee benefits, the office rent and equipment, the executive oversight and other administrative costs, such as the finance and legal departments). Ms. Powers used those percentages of time spent on SERFF and how the 12.8 full-time positions equate to the number of positions overall, and indirect expenses that benefit SERFF were allocated accordingly.

Ms. Powers noted that revenue streams related to SERFF are important to help fund overall NAIC initiatives, especially given the \$10,000,000 gap between revenue and expenses in the 2021 proposed NAIC budget.

Mr. Birnbaum asked for clarification on the salary line item and professional services line item. Ms. Powers confirmed that the salary line represents roughly 13.2 full-time staff, and Ms. Morrison illuminated that professional services not only includes the SERFF Plan Management fiscal, but also general consulting services within the Filing Solutions department.

Mr. Birnbaum asked for allocation clarification regarding the rent and hardware/software expenses line and the technical support expenses line. Ms. Powers confirmed that those line items are also calculated considering the SERFF percentage against the entire budget for those applicable line items. She confirmed that the administrative support line item includes any expenses associated with billing SERFF users and payment processing. Mr. Birnbaum asked if the NAIC considers any of the facilities to be capital assets, and if so, if they support SERFF. Ms. Powers said she will have to do research on that question.

### 5. Received an Update on SERFF Modernization

The SERFF Assessment was completed and presented to NAIC membership at the Summer National Meeting. An oversight group of nine NAIC commissioners, along with NAIC staff, was created to prepare a request for proposal (RFP) for the initial phase of the project. This pilot and mobilization phase will prove out tools and technology to be used in the SERFF Modernization. The oversight committee plans to release the RFP within the next two weeks. Responses will be reviewed, followed by interviews conducted with selected vendors and the selection of final vendors by early next year.

### 6. Discussed the Process for 2021 SERFF Advisory Board Appointments

Katie Chance (NAIC) presented the application process (Attachment Seven) for industry and consumer representative seats for the 2021 SERFF Advisory Board (SAB). A draft application was presented to the Advisory Board, and Ms. Chance asked that any requested changes to the application be submitted by Thanksgiving. The application will go live on the NAIC website and announced via a press release in mid-December. Three industry seats and one consumer representative seat will be appointed by the NAIC Executive (EX) Committee in February 2021. Interested parties should plan to have their application submitted by Jan. 15, 2021. Terms run from March 1, 2021, and end on Feb. 28, 2022.

Having no further business, the SERFF Advisory Board adjourned.

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## SERFF Activities Report

### SERFF Development

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#### **SERFF Production Releases**

Since the report provided in November 2020, the System for Electronic Rate and Form Filing (SERFF) team has introduced three releases to production.

- SERFF 7.54 was released on Nov. 5, 2020. This release completed the third phase of the billing project. The updates included the ability for NAIC Transaction Fees to be paid upon submission with a payment method of credit card if the instance is enabled for credit card payments. The release will also include a label change for all Life, Accident/Health (A/H), Annuity and Credit filings from “Implementation Date” to “Effective Date” at the direction of the Speed to Market (EX) Working Group.
- SERFF 7.55 was released on Jan. 21, 2021. This release completed the final phase of the billing redesign work, which moves all customers to pay NAIC Transaction Fees at submission with either Automated Clearing House (ACH) Debit—i.e., electronic funds transfer (EFT)—or credit card once all filing block units have been used or expire. There were a few small enhancements and bug fixes included in the release as well, such as the hyperlinking of the SERFF Tracking Number and the Form Number on the Form Schedule and Rate/Rule Schedule. These enhancements were completed on Property/Casualty (P/C) filings only as the work was already completed on Life, A/H, Annuity and Credit filings.
- SERFF 7.56 was released on March 4, 2021. This release revived the industry two-way application programming interface (API)—i.e., a service provider interface (SPI)—service. There were additional updates, including a new state report, which was introduced at the direction of the Speed to Market (EX) Working Group. Another enhancement that is included is the ability for each user to set their own landing page upon login. Every user will have the ability to select the tab and the individual page under that tab that they wish to view upon each login.

#### **Upcoming Work**

Work is now underway for the first phase a new strategic project for 2021, the Plan Management Project. This work is being completed at the request of the federal Centers for Medicare & Medicaid Services (CMS). It will consist of two pieces: federal reporting for state-based marketplaces (SBMs) and transferring specific documents contained on rate filings. The work has commenced on the federal reporting for SBMs, and it will allow all authorized users to transmit their certified plan data directly to the CMS for reporting, as required under the federal Affordable Care Act (ACA). This first phase will also eliminate two existing processes, which were used by NAIC support staff to report on behalf of SBMs.

#### **SERFF Product Steering Committee**

The SERFF Product Steering Committee (PSC) met Oct. 14, 2020, and Feb. 10, 2021. The PSC heard updates on completed and in progress work, updates on the roadmap for 2021, and updates on the SERFF Assessment project.

## SERFF Marketing/Implementation

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### **SERFF Transaction Volume**

SERFF concluded 2020 with nearly 550,000 rate and form filings and 24,177 plan submissions for plan year 2021. For the current submission year, transactions are down 5% from projections, but they are expected to level out as the year progresses.

### **SERFF Marketing Activities/Events**

The SERFF team participated in the NAIC's virtual Insurance Summit. SERFF staff hosted both industry and state insurance regulator sessions discussing enhancements and time-saving tips around the application. The Implementation team is currently preparing for the virtual conference for Life & Health Compliance Association, and it will be hosting a session regarding changes coming to the SERFF platform, as well as tips and tricks.

### **SERFF Implementation**

The SERFF Implementation team has been involved with customer outreach as the Development team completed the multi-phase SERFF Billing enhancements project. The NAIC and insurance companies transitioned from a billing model that involved prepaid blocks of filing transactions and invoices to a model that supports real-time payment of transaction fees at the time of filing submission. The final release delivered functionality that allows insurance companies to submit payments via ACH Debit, similar to how state filing fees are paid in SERFF. Credit card payment capabilities were introduced earlier in the project.

As existing prepaid transaction blocks are depleted, customers will automatically transition to payment via ACH Debit. A proactive communication plan is in place to ensure that the customers are aware of and prepared for the transition. As each customer is transitioned, they will be assigned a fixed unit price according to a tiered structure long in place for SERFF. For 2021, each company will remain in the same tier as they did under the previous billing model. As part of the NAIC's *State Ahead* initiative effective Jan. 1, 2021, the SERFF transaction fee increased across all pricing tiers by \$0.25 per transaction.

The new streamlined billing model will reduce manual effort for NAIC staff and insurance companies to track and manage prepaid blocks and invoices. Additionally, as prepaid blocks are depleted or expire, the NAIC's financial liability for carrying these prepayments will be reduced and eventually eliminated.

Effective Jan. 1, 2021, the Speed to Market (EX) Working Group has adopted new changes to the uniform product coding matrices (PCMs). The changes include two new subtypes of insurance for life, accident and health. The Implementation team has been in communication with states to begin configuring the new subtypes for submission, and it will continue efforts throughout the coming quarter.

NAIC data hosting moves into its second year, with 411 industry instances using the feature. Instances enabled with NAIC data hosting will retain filings set to destruct by State Data Retention (SDR).

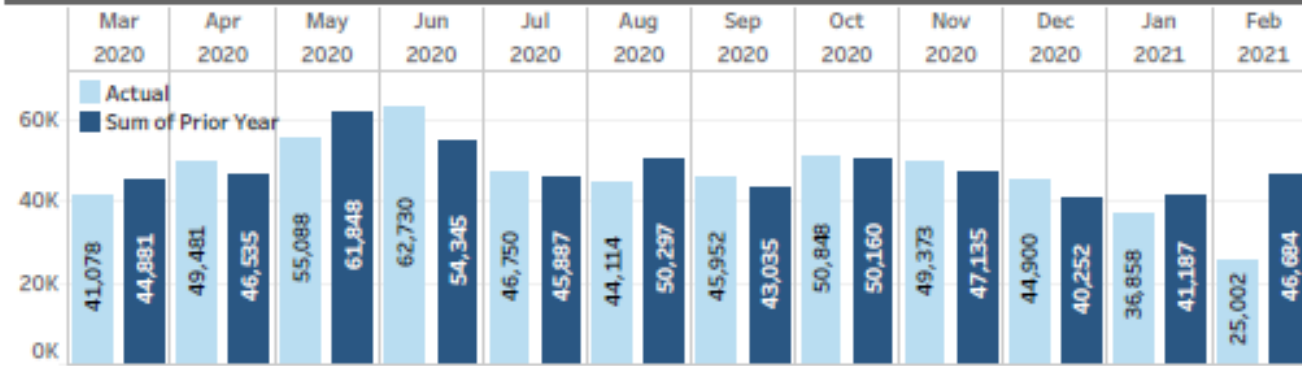
### **SERFF Filing Access**

Forty-eight states are using SERFF Filing Access (SFA) in at least one business area; recently, California has expanded its use to include the life and health instance. Concluding the 2020 year, there have been more than 1.65 million searches in the application. The Marketing and Implementation team continues its outreach in efforts to transition additional states.

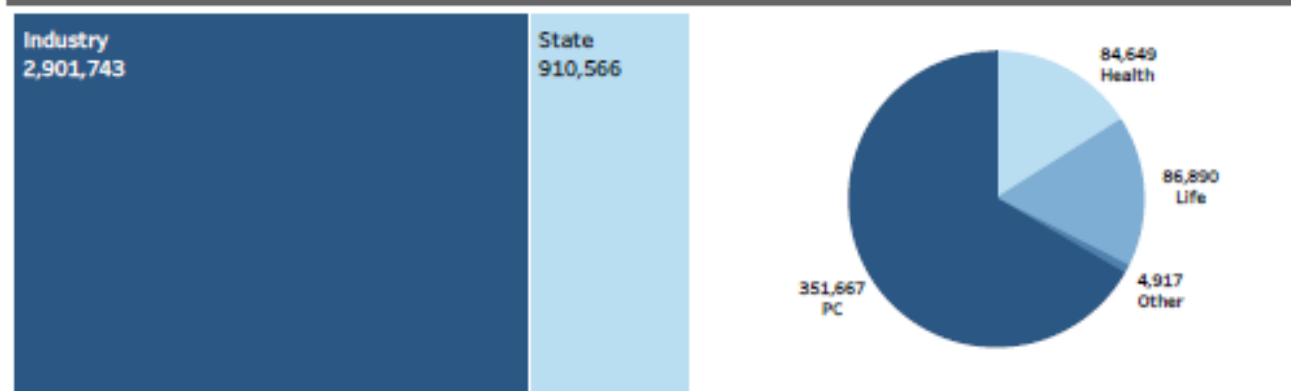
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**NAIC** National Association of Insurance Commissioners  
**SERFF Dashboard for March 2020 - February 2021**  
**SERFF**

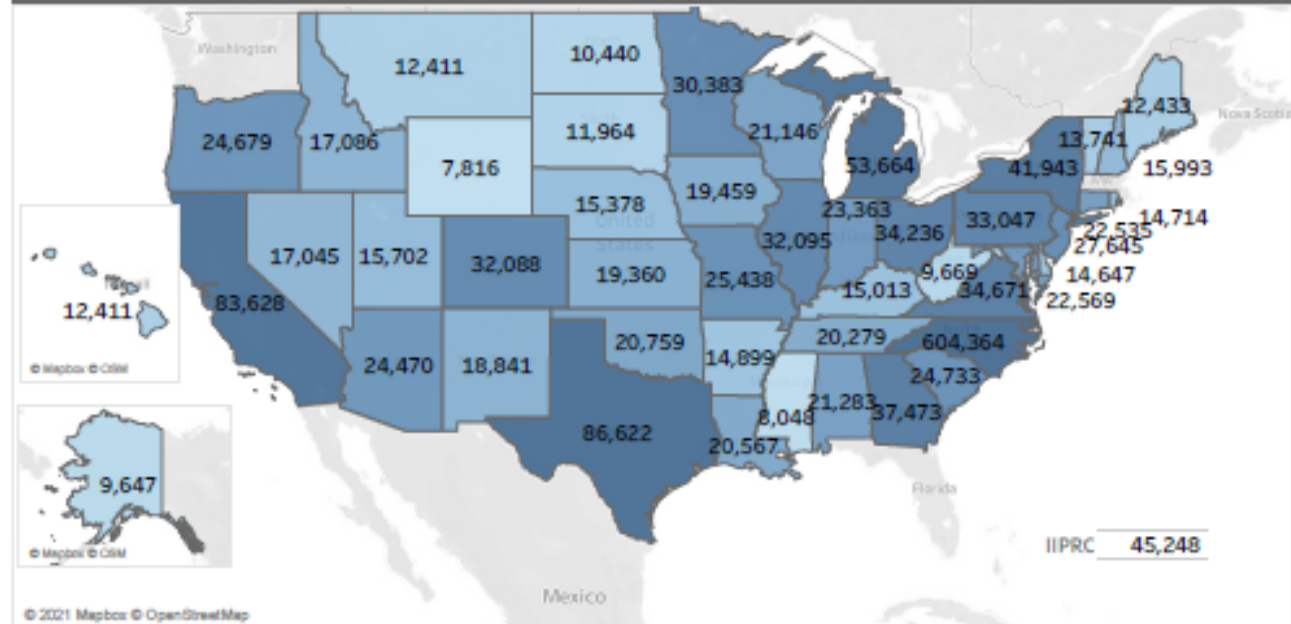
**Transaction Counts - Year over Year**



**Logins** **Filing Experience**



**SERFF Filing Access Searches**



**EPMO Project Name:** SERFF Billing Enhancements **Status Date:** 2/1/2021

Current Phase*:	3-Closeout	Project Sponsor:	Joy Morrison	Business/Product Owner:	Brandy Woltkamp
Project Manager:	Joy Morrison	Project Start Date:	01/01/2020	Project End Date:	01/21/2021
State Ahead Goal*:	N/A	State Ahead Objective*:	N/A	IT Impact Yes/No:	Yes

<b>Description:</b> This project will streamline the process of charging SERFF transaction fees and eliminate the significant manual effort to administer the collection of these fees, as well as eliminating the financial liability of pre-paid filing blocks. First, prepaid blocks will be eliminated; instead, a fixed per-transaction rate will be assigned to customers for a calendar year based on filing volume in the previous calendar year. This will preserve the tiered fee structure currently approved by the SERFF Advisory Board and advocated by industry. Second, this project will modify the filing process to collect transaction fees along with applicable state fees at the time of filing, eliminating manual efforts on the NAIC's part to invoice and collect fees after the filing has been made and manual efforts on customers' part to log into a separate system in order to pay the invoices. This step includes creating a credit card option for current Pay As You Go customers who do not want to use Automated Clearing House (ACH) Debit.	Milestones/Task	Start Date	End Date	Status	
	Project Initiation	01/01/2020	01/31//2020	Complete	
	Resource Allocation	01/01/2020	02/01/2020	Complete	
	Phase III Development (Credit Card)	08/01/2020	11/05/2020	Complete	
	Phase IV Development (Block Removal)	10/21/2020	12/18/2020	Complete	
	Phase IV Internal INT and BETA Testing	12/21/2020	01/01/2021	Complete	
	Phase IV User Acceptance Testing	12/15/2021	01/12/2021	Complete	
	Project Close Out Activities	01/01/2021	01/21/2021	Complete	
	<b>Executive Status/Support Needed:</b>				

Recent Accomplishments	Upcoming Activities	Key Issues/Risks	Issue/Risks Action Plan	Project Health*	Overall Status: On Schedule		
<ul style="list-style-type: none"> <li>Completed User Acceptance Testing.</li> <li>Completed rollout of Phase IV-filing block removal.</li> </ul>	<ul style="list-style-type: none"> <li>Customer communication will be ongoing as customers' blocks are depleted; we will move them to the new fee model.</li> </ul>			% Complete	100%		
				Financial Update	Approved	Actual Inception To Date	On Budget?
				Budget Revenue	N/A	N/A	N/A
				Budget Capital	N/A	N/A	N/A
				Budget Expense	\$16,360	\$16,360	Yes
				Staff Hours	4,986	4,420	Yes



**EPMO Project Name:** SERFF Billing Enhancements

**Status Date** 2/1/2021

**Additional Comments:**

- This project does not include hours to remove the lines of code in the application that are currently used to manage filing blocks. That work will have to be completed as operational work at some point, or it will be eliminated as SERFF is redesigned.
- The SERFF Filing Review Tools Pilot fiscal was approved and although the projects will be reported separately, the work will be folded into the timeline for this project. This may require the project deadlines to be extended by a few months.
- There is significant business work to be done related to expiring filing blocks. The prepaid block process will have to be modified to expire blocks in September or October 2021, which will require a communication plan. Similarly, the team will need to stop selling prepaid blocks to coincide with the implementation of block elimination.
- Technology deliverables have to be matched to the business milestones in order for customers to use their prepaid blocks without needing to purchase new ones.
- Business partners in Finance and Strategic Business Initiatives (SBI) have been notified of and are in agreement with new milestone estimate dates for credit card and deletion of filing blocks as a result of bringing the SERFF Filing Review Tools Pilot work into this project timeline.
- Percentage complete for the October report did not change because additional credit card work was discovered that offset the work completed.

**Major Features/Deliverables:**

1. Introduction of a credit card payment option for non-ACH debit, infrequent filers.
2. Collect a SERFF transaction fee via ACH debit at the time of filing/binder submission.
3. Create/document/communicate process to calculate a customer's transaction fee based on prior transaction volume.
4. Create self-service interface to CECL.
5. Develop Reporting Tools for Billing.
6. Develop People Soft integration.
7. Complete customer communication and training materials for each project phase.

**Financial Comments:**

Project hours for Phase 2 are reported in the Filing Review Tool project report. PCR approved on Nov. 23, 2020, to add an additional 1,253 staff hours to the project and change the end date to Feb. 4, 2020. Only half of those hours were needed, and the project will complete two weeks earlier than estimated in November.  
**Project is Complete as of Jan. 21, 2021.**

States/Territories Impacted		States/Territories Participating		Reference Information			
				State Ahead Goals	State Ahead Objectives	Project Phases	Project Health Legend
<ul style="list-style-type: none"> <li>States should not be impacted by this project as it is strictly related to the <i>transaction</i> fees NAIC collects.</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<ul style="list-style-type: none"> <li>N/A</li> </ul>	<p>Goal 1. Provide insurance regulators with the data, training, and tools required to support a collaborative regulatory environment that fosters reliable and affordable insurance products.</p> <p>Goal 2. Ensure consumer protection keeps pace with changes in the marketplace and consumers have information and education needed for informed decision-making.</p> <p>Goal 3. Provide optimal services to support state insurance regulators and equip them with talent and resources.</p> <p>Goal 4. Optimize the efficiency and effectiveness of the NAIC structure to focus on member priorities and maximize member engagement.</p>	<p>A</p> <p>B</p> <p>C</p> <p>D</p> <p>E</p> <p>F</p> <p>G</p> <p>H</p>	<p>1. Initiation</p> <p>2. Execution</p> <p>3. Closeout</p> <p>4. On Hold</p>	<p><b>On Schedule:</b> Project will likely meet schedule, budget, scope /quality.</p> <p><b>At Risk:</b> Change is needed to get back on schedule, budget, scope/quality.</p> <p><b>At Significant Risk:</b> Probable that project will not meet at least one of the following: schedule, budget, scope/quality.</p>



## Enterprise Project Management Office

**Project Name & Status Date**

**SERFF Plan Management Enhancements**

**3/1/2021**

**Description**

This project will support integration with federal systems to streamline two separate reporting processes put into place with the Affordable Care Act. The first update will allow states which host their own healthcare marketplace to submit required reporting directly to CMS from SERFF. The second update will allow insurance companies to seamlessly submit a report to the state and CMS simultaneously which will eliminate the need for entry into two different systems and ensure all data is kept in sync.

**Demographics**

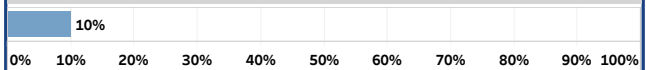
State Ahead Goal	3
State Ahead Objective	G
Current Phase	2-Execution
Project Sponsor	Joy Morrison
Business/Product Owner	Joy Morrison
Project Manager	Bridget Kieras
IT Impact	Yes
Project Start Date	1/11/2021
Project End Date	12/17/2021

**Milestones/Tasks**

Milestone	Start Date	End Date	Status
Project initiation update #1	1/20/2021	2/9/2021	Complete
Service integration complete and released to production update #1	3/4/2021	4/15/2021	Not Started
Final development and release to production	4/16/2021	11/30/2021	Not Started
Project close out activities	12/1/2021	12/17/2021	Not Started
•	Null	Null	N/A
•	Null	Null	N/A
•	Null	Null	N/A

**Complete Project Health**

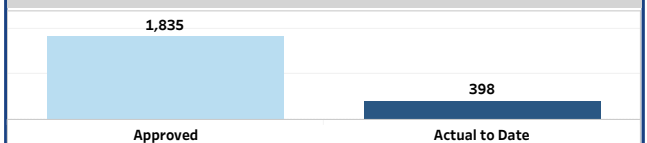
On Schedule



**Project Health Budget**

Budget Capital		Budget Expense		Budget Revenue	
Approved	Actual to Date	Approved	Actual to Date	Approved	Actual to Date
		\$291,800	\$31,420		

**Project Health Staff Hours**



**Recent Accomplishments**

Development work has begun. Approximately 75% of this work is complete for phase 1.

Testing work has started for phase 1 with approximately 50% of this work complete for phase 1.

Scope discussions have started for phase 2 with external stakeholder.

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**Upcoming Activities**

Prioritize the second phase of the project.

Finish the development and internal testing of the first phase of the project and release this piece to production.

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**Key Issues/Risk**

New Project Manager assigned to project.

External stakeholder has not determined the new service testing timeline for phase 1. The project cannot be used in production until this step is complete.

External stakeholder planned to increase the scope for phase 2.

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**Issues/Risks Action Plan**

PM meeting with PO and Sponsor to get up to speed on project plan. PM has familiarity with SERFF so minimal impact expected.

Continued conversations with stakeholder to narrow focus on scope within project guidelines as well as determine testing timeline.

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