

**STATE OF NEW MEXICO
CHILDREN YOUTH AND FAMILIES DEPARTMENT**

**REQUEST FOR INFORMATION (RFI): Replacement or
Transition of the State of New Mexico Child Welfare
Case Management System, Project Planning**

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cyfd



Children Youth &
Families Department

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II. INTRODUCTION

A. PURPOSE OF THIS REQUEST FOR INFORMATION (RFI):

This Request for Information (RFI) is issued by the New Mexico Children Youth and Families Department (CYFD), to solicit information regarding solutions to modernize or replace CYFD's State Automated Child Welfare Information System (SACWIS). CYFD's SACWIS is the Family Automated Client Tracking System (FACTS).

The purpose of this RFI is to obtain information that will inform a subsequent Request for Proposal with the goal to engage a nationally recognized firm that specializes in planning the transition or replacement of child welfare systems for a systems modernization project including but not limited to a federally certified Comprehensive Child Welfare Information System (CCWIS). This firm will conduct a comprehensive study that will provide the State with a recommendation and roadmap for the transition or replacement of our current child welfare system. In addition, the State requires support for the activities necessary to obtain Federal Financial Participation (FFP) via an Implementation Advance Planning Document (IAPD) and information and support for future procurement activities in order to secure a contract with a vendor(s) to deliver the recommended solution if necessary.

The Administration for Children and Families (ACF) has announced the Comprehensive Child Welfare Information System (CCWIS) final rule, which replaces the previous Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) regulations. With CCWIS, New Mexico has the opportunity to take advantage of leading technology capabilities to improve data and implement solutions specifically designed to modernize and enhance the efficiency and effectiveness of our program practices. This allows us the flexibility to tailor our information technology needs more closely to our unique program requirements.

CYFD is interested in exploring the following options to address the CCWIS regulations and opportunities to improve current child welfare operations:

- Option #1: Replacement of the Department's current system with a Commercial Off-The-Shelf (COTS) product;
- Option #2: Replacement of CYFD's current system with a transfer system that meets the majority of the business practice needs; including an analysis of how current and planned development projects could be leveraged into a new system;
- Option #3: Replacement or supplementation of the Departments current systems with a custom-built product;

B. BACKGROUND INFORMATION:

The New Mexico Children, Youth and Families Department (CYFD) is responsible for providing an array of prevention, intervention, rehabilitative and after-care services for NM children and their families. Within CYFD are four primary divisions or service areas that partner with NM families and communities in meeting these responsibilities:

- Protective Services (PS): Charged with investigating reports of children in need of protection from abuse and neglect, and taking action to protect and promote the well-being of those children whose safety cannot be assured. Whatever the extent of a child's involvement with PS process (such as investigation, client services, placement or permanency), our staff are committed to ensuring the safety and well-being of PS involved children and providing permanency in a timely manner.
- Juvenile Justice Services (JJS): Provides effective delinquency prevention through the use of interventions that emphasize community-based alternatives. We are committed to keeping our children safe and prepare them to be contributing members of society by providing treatment and rehabilitative services tailored to their needs, while also holding our clients accountable and protecting public safety.
- Early Childhood Services (ECS): Help develop the full potential of New Mexico's children by building a strong continuum of early childhood services that balance access and quality with an eye to serving our most vulnerable. This helps ensure that New Mexico children are safe, healthy, loved, and ready for school.
- Behavioral Health Services (BHS): In collaboration with PS, JJS, and ECS this division is committed to the provision of quality behavioral health services and supports that are trauma informed, evidence based, culturally competent, and youth and family driven that meet the needs of CYFD's children, youth and families.

With a staffing level of approximately 2300 workers, CYFD utilizes a case management system called the Family Automated Client Tracking System (FACTS) in support of the Agency's mission:

"Improve the quality of life for our children"

FACTS is at end of life, expensive to maintain, does not allow for the introduction of new technologies, and cannot adapt to constant changes in regulations and requirements such as the Comprehensive Child Welfare Information System's (CCWIS) final ruling. The Administration on Children and Families (ACF) has replaced the Statewide and Tribal Automated Child Welfare Information System (S/TACWIS) regulation with the CCWIS regulation. The new regulation was effective August 1, 2016 and governs the way in which state and tribal title IV-E agencies, like CYFD, will claim federal funding for child welfare information systems that support the administration title IV-E and IV-B programs, under the Social Security Act. The CCWIS regulation also includes new requirements around design, data quality, data exchange standards, and aligns with current and emerging technologies.

In support of CYFD's mission and to meet the new regulatory requirements, CYFD must modernize its critical enterprise system that is in short, in need of a complete overhaul or replacement. Modular, integrated design will be the driving force behind this activity focusing on Protective Services and Juvenile Justice Services functionality. The primary goal will be to provide a fully functional modern integrated child welfare CCWIS compliant system that improves overall worker productivity, operational efficiencies, and aligns with the business objectives of CYFD. CYFD seeks to gather information from a variety of vendors to aid it in evaluating approaches to ensure continued high quality automation support for its Child Welfare Program. Concise, conceptual responses, free of technical jargon, are sought which will inform CYFD leadership of the options available and estimates of cost and implementation timeframes. The State seeks to gain a better understanding of the available approaches; therefore, responses are being solicited from a wide range of respondents in accordance with the objectives and parameters established in this document. Vendors may submit a response that includes one or more proposed solutions; however, responses should separately address all applicable information sought in this RFI.

All proposed solutions should address the following State requirements:

- The need to meet all Federal CCWIS certification standards;
- Compliance with mandates set forth in the ACF Federal regulations;
- Flexible design in anticipation of expected changes in the future.

C. CURRENT SYSTEM ARCHITECTURE

- Base Hardware: Flexpod, Blades, HP Store once, Cisco Aggregation Service Routers

- Base Operating System: Windows
- Data Base(s): Sybase
- Application Language: PowerBuilder/Cobol
- Number of Users: 2300
- Age: In operation since 1997

D. AUTOMATED FUNCTION CHECKLIST

Based upon preliminary analysis, CYFD has identified the following core functions of our case management system. “PS” means Protective Services and “JJS” means Juvenile Justice Services. Please include in your response if the following core functions are “out-of-the-box”, custom or future, not available, or some third party component of the solution(s) being presented. Any additional descriptions would be appreciated as well. A table for vendor responses to the Automated Functions Checklist has been provided.

Function Name	Description	Comments
PS/JJS Case Maintenance/Person Management	Demographics	Case Maintenance and person management is the data base for all demographic information related to case participants and basic information related to the type of case. This functionality is shared by JJS.
PS Intake	The purpose of PS Intake is to receive reports of child abuse or neglect, determine if the situations may constitute abuse or neglect as defined by the NM Children's Code, determine if an investigation by PSD and referral to another agency is warranted, and receive reports of incidents involving children in placements and determine if such reports warrant investigation.	All requirements related to intake are included in FACTS Functionality. All Intake services are provided through CYFD and there are no contracts services or external systems. CYFDS Statewide Centralized Intake (SCI) is staffed 24/7.
PS Investigations	The purpose of PS Investigations is to assess safety of children who are subjects of reports of alleged abuse or neglect by collecting and assessing information to determine whether the alleged child abuse or neglect occurred, determining whether any child in the home is vulnerable to present or impending danger, assessing the parent or guardian protective capacities, and determining the need for additional services.	All requirements related to investigations are included in FACTS functionality. All investigations services are provided through CYFD and there are no contract services or external systems. Note that the Safety and Risk assessment currently utilized are being updated through a contractor. This change will be addressed fully in the description of the Assessment Function.

Function Name	Description	Comments
PS Assessment		
Safety	<p>The purpose of the NM Safety Assessment Tool is to help assess safety threats and protective capacities, determine interventions, and provide the foundation for decision making. The safety assessment is completed at key decision points in the case including initiation of an investigation, prior to closure of investigation, when there is a decision to place a child in foster care, and when there is a significant change in family circumstances.</p>	<p>Currently the automation of the Safety Assessment is included in FACTS functionality. CYFD is in the process of updating our current safety assessment and the automation of this tool.</p>
Risk	<p>The purpose of the NM Risk Assessment Tool is to identify families which have high, moderate, or low probabilities of continuing to abuse or neglect their children. The risk assessment is completed prior to closure of an investigation and aids in identifying the level of intervention.</p>	<p>Initial and ongoing risk assessment was determined to be an area needing improvement during the 2015 CFSR. CYFD is planning to update the risk assessment and automation.</p>
CANS	<p>CANS is the Child and Adolescent Needs and Strengths Assessment. CANS screening is a process for integrating information on a child's needs and strengths for the purpose of case planning, service planning, and trauma screening. CANS screening is conducted for all children in foster care at adjudication and every 6 months thereafter.</p>	<p>CYFD has implemented the CANS Assessment in order to address the need for trauma screening identified in the state's APSR. CANS provides an ACES score and triggers prompts to apply for DD Waiver. The user logs into an external website. The data from the CANS does not exchange back to FACTS. The vendor maintains all of the data and provides analytics to CYFD. The worker prints the completed assessment and includes it in the hard copy file and attaches to court reports.</p>

Function Name	Description	Comments
In Home Services (Case Management)		
Internal	The purpose of In Home Services is to promote the safety of children and reduce the risk of the recurrence of abuse or neglect of children by their parents, guardians, or custodians without the intervention of the courts. In Home Services are provided for a maximum of 180 days with a possible 45 day extension.	All requirements related to CYFD's internal In Home Services program are included in FACTS functionality. In Home functions include the Voluntary Service Intake, Determination of Foster Care Candidacy, The In Home Service Plan, and In Home worker and supervisor documentation. Currently CYFD's internal In Home Services is offered in 16 of the 25 county offices.
Contract Services/Child Welfare Contributing Agencies (CWCA)	In addition to the internal In Home Services program, CYFD contracts with community providers to provide In Home Services. The agreement requires contractors to provide the same service as the internal program.	In Home Contract providers do not have access to FACTS. Contractors document the service plan and worker and supervisory case notes in hard copy files and submit a monthly report to the CYFD contract manager. Detailing services provided. Currently there are 4 contracts providing In Home Services in 4 different counties. These cases are eligible for selection during the CFSR and PIP monitoring. If a contracted In Home case is selected for review, the contractor provides the hard copy case file. The contracted In Home Services are targeted to areas in with there are identified gaps in service array. A goal of the NM CCWIS project is to expand access to the database for contract providers to ensure improved case documentation and data quality concerning these services.
PS Permanency Planning (Case Management)	The purpose of permanency planning services is to systematically carry out, within a time limited period, a set of goal directed activities designed to help children live in that offer the continuity of relationships with nurturing parents or guardians and the opportunity to establish health and positive lifetime relationships. PSD provides permanency planning services to children or youth who come into the custody of PSD.	All requirements related to PS permanency planning services are included in FACTS functionality. Permanency Functions include case planning, designation of the permanency goal, maintenance of the placement record and level of care, visitation planning and record, documentation of court reports, and permanency worker and supervisor documentation.
PS/JJS Medical/Mental Health Record	Case management module for the purpose of tracking the provision of physical and behavioral health services for children in care, medications, immunizations, diagnosis, and record of health care providers.	All requirement related to PS permanency planning services are included in FACTS functionality. PSD is currently developing requirements for improved data reporting related to health screening, diagnosis, and medication oversight in anticipation of AFCARS 2.0 regulations. This functionality is shared with JJS.

Function Name	Description	Comments
PS/JJS Education Record	Case management module for the purpose of tracking educational services for children in custody including enrollment in school, academic progress, and special education needs.	All requirements related to PS permanency planning services are included in FACTS functionality. This functionality is shared with JJS.
PS Legal Services	The purpose of PS legal services is to represent PSD's position in court with regard to the permanency plans for children, protect children through legal intervention, and facilitate permanency in relevant cases.	All requirements related to PS legal services are included in FACTS functionality. The Children's Court Attorney (CCA) inputs all information related to the legal status of the child, the results of all hearings, and all legal action in FACTS. Currently NM does not have a data exchange with the courts and so all legal information is filed manually with the court and inputted in FACTS in order to maintain the legal record. Our CCWIS plan includes the goal of bi-directional data exchanges with the court system. The Judiciary supports this goal but the feasibility of such an exchange has not been evaluated and an MOU has not been established. Currently CYFD and Judiciary do share data through a manual process for quality assurance purposes.
PS Placement Services	The purpose of placement services is to recruit, support, and retain safe and stable families willing to make life long commitments to foster children and their families, to create permanency families for children requiring adoption, and to ensure a child's safety, permanency, and well-being.	CYFD licenses all foster care providers, adoptive homes, and facilities that provide placement. The Protective Services Division licenses and maintains all regular foster homes and adoptive homes. CYFD's Behavioral Health Division Licensing and Certification Authority Bureau (LCA) certifies compliance with state and federal regulations operated by in state Medicaid providers including Accredited Residential Treatment Center (RTC), Group Home Services, Treatment Foster Care Services, and Community Shelters. CYFD uses both internal staff and contracted staff to complete home studies of prospective foster parents. The contractors provide all home study documents to CYFD and they are uploaded in FACTS.
Licensing/Maintenance (Regular Foster Care)	Protective Services	PS maintains all initial licensure and recertification data for foster homes and adoptive homes in FACTS.
Licensing/Certification of Treatment Foster Care, Residential Treatment Centers, Group Homes/Shelters	Licensing and Certification Authority Bureau (LCA)	The LCA does not utilize FACTS for certification of TFC, RTC, Group Homes, and Shelter. The LCA does not have a data management system for this process. All LCA certified providers are maintained in the FACTS database in order create placement and generate payments

Function Name	Description	Comments
PS Adoption/Guardianship Assistance	The purpose of adoption and guardianship assistance is to support eligible children who by providing financial assistance and medical coverage and post-placement adoption support services to support families in meeting the needs of the child.	All requirements related to financial and medical coverage assistance are included in FACTS functionality. PS contracts with a community agency to provide post-adoption services. This functionality is not included in FACTS.
PS Youth Services	The purpose of youth services is to assist youth in successfully transitioning into adult living, promote self-sufficiency, promote the safety permanency, and well-being of youth, promote positive youth development, and promote relations with mentors and other supportive adults. Youth services is provided to all youth in custody, youth who have aged out of foster care at age 18, and youth who were adopted from foster care after the age of 16.	All requirements related to Youth Services are included in FACTS functionality. PS utilizes community based agencies and foster parents to provide services to youth including life skill training but all assessments and case management activities are maintained in FACTS.
PS IV-E Eligibility Determination	The purpose of the eligibility determination program is to conduct Title IV-E and Medicaid eligibility determinations for children in out of home placement through PSD custody or a signed voluntary placement agreement. The determination is initiated when an out of home placement is created in FACTS. The determination is has one on information provided by the primary worker and information obtained from state and federal databases including those maintained by the Social Security Administration, the NM Department of Workforce Solutions, and the NM Human Services Department. The IV-E Specialist conducts a re-determinations of all eligible children every six months as long as the child continues in custody and remains out of the home.	All requirements related to PS Title IV-E and Medicaid Determination are included in FACTS functionality. The Title IV-E Specialist documents the initial Title IV-E determination and re-determination and any updated case information related to eligibility in FACTS. There is currently a limited bi-directional data exchange with HSD ASPEN, as we harvest the Aspen Response File (received Monday-Friday) for a few key pieces of information. Since late 2017 we store the ASPEN MCO number on the most recent FACTS Title XIX record, and also the child's date of death, although that was not tested for and needs a code correction for death of adopted children. Development project in-process, populate 2-3 other TITLE XIX fields, and store the ASPEN ID on the PERSON table. However these do not provide total CCWIS compliance.
PS Contracted Services	PSD awards contracts to community based providers for services for children and families. Contracted services include Family Support Services, Time Limited Reunification Services, and Domestic Violence Services.	Contracted providers are not responsible for case management or placement activities. Contractors provide progress reports back to the PS worker and the information is captured in FACTS narrative of court report in the same fashion as other provider information.
Content/Document Management		
Application Programming Interface (API)		

Function Name	Description	Comments
PS Financials & Payments	Monthly maintenance payments for foster care and child care are generated from approved out of home and child care placements entered into FACTS. Payments for vendors providing goods and services are entered in FACTS in the Payment Request Windows. Payment information is transferred electronically to the state financial system SHARE and payments are generated.	PS is currently developing a process to transition all childcare placement data from FACTS to EPICS, the management information system utilized by the Early Childhood Services, a division of CYFD.

III. PRELIMINARY OBJECTIVES:

The State’s preliminary objectives for a FACTS replacement include the following key provisions identified in the Comprehensive Child Welfare Information System (CCWIS) Notice of Proposed Rulemaking (NPRM) 45 CFR Part 95, 45 CFR Parts 1355 and 1356 (Dated August 11, 2015):

- Promote data sharing with other agencies: The proposed rule requires, if practicable, data exchanges with other health and human service agencies, education systems, and child welfare courts. Data exchanges will help coordinate services, eliminate redundancies, improve client outcomes, and improve data quality.
- Require quality data: Title IV-E agencies implementing a CCWIS must develop and implement data quality plans and processes to monitor data quality. The rule also requires agencies to take corrective action to address identified problems.
- Reduce mandatory functional requirements: While the SACWIS/TACWIS regulations require that the system supports a minimum of 51 functional requirements, CCWIS only has 14 requirements. The proposed rule allows agencies to build functions in the CCWIS or collect needed data through exchanges with other systems.
- Allow agencies to build systems tailored to their needs: The proposed rule focuses federal requirements for this optional system on quality data and exchanges between related information systems. This will allow agencies to build systems tailored to their unique business needs rather than on functions defined by the federal government.

IV. REQUEST FOR INFORMATION OBJECTIVES:

- Evaluate vendor supplied information to conduct a comparative analysis of the possible solutions, to aid in determining the optimal approach to utilizing modularity in a system redesign.
- Identify possible automated solutions for improved management of essential child welfare activities.
- Utilize information collected to facilitate the evaluation of the feasibility and cost/benefit of a FACTS replacement.
- Collect information to better understand opportunities for interoperability of the child welfare components with other state systems identified in the comprehensive child welfare information system (CCWIS) notice of proposed rulemaking (nprm). Identify new technology, best practices and business initiatives to be considered in the FACTS replacement planning process.
- Evaluate vendor supplied information to conduct a comparative analysis to improve reporting capability (e.g. AFCARS, the adoption and foster care analysis reporting system).
- Identify possible automated solutions for improved data quality management and reporting.

V. POTENTIAL CONTRACT

This RFI has been issued to obtain information only and is not intended to result in a contract or vendor agreement with any respondent. CYFD is seeking vendor community insight and information prior to finalizing business, functional, operational, and technical requirements for a Request for Proposal (RFP). There is no definitive plan to purchase any business services, equipment and/or software at this time as a result of responses to this RFI.

This solicitation for information does not commit the State to publish a RFP or award a contract. The issuance of a RFP, as a result of information gathered from these responses, is solely at the discretion of the State. Should a RFP be issued, it will be open to qualified vendors, whether those vendors choose to submit a response to this RFI. The RFI is not a pre-qualification process. After information from this RFI is fully evaluated, and depending on funding and other factors, a Request for Proposal (RFP) may be published by CYFD to select a vendor for specific work to be done which would result in a contract.

The anticipated contract would procure consultants to do Business Workflow Analysis, a gap analysis between current business procedures and the existing system, a cost

benefit analysis on enhancing the current application to bring it more in-line with the business processes, and a cost benefit analysis on creating a new application (or any other feasible options). At the end of this effort, the intent would be to have a completed feasibility study, which would ensure ongoing federal funding for the next generation of the NM CCWIS

VI. RFI REQUESTED RESPONSE

CYFD is seeking a better understanding in the areas listed below, and requests responding vendors to provide a response to each of the following questions.

1. Briefly describe the Vendor's organization, client base, financial stability and history. Please keep generalized marketing material to a minimum.
2. With which cyber security national standards does the Vendor's organization/product comply?
3. The State is interested in a comparative analysis of the advantages and disadvantages of the three most probable options, which have been identified in section II. Provide the Vendor's analysis/recommendations for one or all of the proposed options to include strategies designed to compensate for technological drift while remaining flexible enough to respond to the unknown.
4. Provide estimates of cost and implementation timeframes for each option presented.
5. Every project has certain inherent risks. Describe the significant risk factors associated with all outlined solutions and how they should be mitigated.
6. Describe any experience/expertise specific to SACWIS and/or a Juvenile Justice System within the Vendor's organization.
7. Provide the Vendor's experience with adherence to state standards, minimization of impact on state staff, minimization of impact on providers and recipients. Additionally, describe the Vendor's experience staffing a project of this size with the Vendor's personnel.
8. Describe the Vendor's relevant experience, with emphasis in the area of developing and deploying a certified SACWIS of at least similar size, scope, and complexity as New Mexico, as well as familiarity with related technologies. Illustrate current experience the Vendor has with state child welfare program operations and systems. Specific to child welfare, list the state(s) in which the Vendor is currently working and describe the services/products being provided. If applicable, describe examples of Vendor initiatives which were particularly successful in aiding a state in enhancing operational efficiency. If none, explain how the Vendor's product/services would fit into child welfare programmatic and systems requirements. Please delineate how the services/products the Vendor is providing to other states would match the solutions New Mexico is seeking. Please provide specific client examples where the proposed solution has worked and is successfully operational.

9. Describe the Vendor's recommended approach to converting data from the existing SACWIS to its successor. In doing so, describe the basic strategy and the specific tasks required to execute the conversion.
10. Describe the Vendor's recommended approach to improving data quality and reporting on the metrics base on the data improvements/management.
11. Provide an overview of the Vendor's experience with commercial off-the-shelf (COTS) products that support child welfare systems.
12. Describe the Vendor's recommended approach to improve provider claims processing for a SACWIS or its successor.
13. Provide an overview of the Vendor's experience with Child Welfare federal reporting (e.g. Adoption and Foster Care Analysis and Reporting System (AFCARS) and the National Child Abuse and Neglect Data System (NCANDS)).
14. Describe the Vendor's experience integrating solutions as part of a strategic agency enterprise application.
15. Describe the Vendor's experience in developing interoperability between state agencies (e.g. interfaces, shared modules) (preferably on similar or like systems).
16. Provide a description of the ongoing cost for maintaining each type of solution post deployment. Give specific information as to the numbers and types of resources required to maintain each type of solution.
17. Provide an overview of the technology and service offerings that the Vendor currently provides. Provide a breakdown of the number of customers served currently by the Vendor's various product offerings.
18. Describe savings the Vendor has achieved with other states' Health and Human Services agencies as a result of the Vendor's services/product.
19. Describe the platform that the Vendor's system operates on (database, code base, etc.). Describe any "wraparound" systems that the Vendor offers to augment the claims payment function such as front-end document imaging, OCR, claims re-bundling, credentialing, Structured Decision Making (SDM) or medical management. If any of these systems are third party systems, please note.
20. Include details of the recommended software solution options including database management system, licensed software for data retrieval and reporting, proposed approach to developing the custom-built software components, and, when appropriate, compatibility with other state systems software.
21. Describe any technology that the Vendor has used to address the challenges inherent in meeting the demands of an environment consisting of constant regulatory changes, with expanding requirements for data sharing. The State's specific interests include: web functionality; new technologies/architectures developed and implemented for child welfare or other related programs that resulted in program savings, greater staff efficiency, error

reduction, and similar benefits; development strategies and technology that achieve a rapid turn-around time for incorporating regulatory changes.

22. The State considers this to be a complex project that may span an extended period of time and requires both capability and commitment from a vendor. The State is interested in gaining a better understanding of the vendor's approaches to managing a similar project. Because the State is familiar with standard system development methodologies, the preferred emphasis is on an explanation of the rationale for timeline decisions and insight into the Vendor's strategies and concerns for managing the timeline.
23. Given the complexity of this project, please describe the necessary service blocks (i.e. "As-Is Analysis", "To-Be Analysis", Feasibility Study, Cost Benefit Analysis, Request for Proposal, etc...) and a description of what those deliverables would look like.
24. Provide suggestions and considerations for the State to evaluate as the State develops the cost model and associated evaluation criteria. Describe the Vendor's pricing/reimbursement methodology. Include costs for implementation, hardware or data lines, upfront licensing, ongoing licensing, and maintenance and support. Include a copy of the Vendor's "boiler plate" customer contractual agreement.
25. Discuss the costs and benefits inherent in the Vendor's solution and compare them using the Federal Revenue Funding Stream Models (IV-E, Medicaid, CCDF etc.).
26. Include any additional comments or suggested alternatives, as deemed appropriate based on the Vendor's industry knowledge and expertise, that the Vendor feels would be beneficial to the State of New Mexico.

VII. RFI RESPONSE SUBMISSION

Responses to this RFI should be by email to karla.young@state.nm.us

- All responses are due by close of business (5 pm MST) on November 23, 2018.
- Note in the subject line of the email submission: CCWIS RFI