May 9, 2022

The Honorable Ronald D. Kouchi,
President, and
Members of The Senate
Thirty-First State Legislature
Hawaii State Capitol, Room 409
Honolulu, Hawaii 96813

The Honorable Scott K. Saiki,
Speaker, and
Members of The House of Representatives
Thirty-First State Legislature
Hawaii State Capitol, Room 431
Honolulu, Hawaii 96813

Dear President Kouchi, Speaker Saiki, and Members of the Legislature:

Pursuant to HRS section 27-43.6, which requires the Chief Information Officer to submit applicable independent verification and validation (IV&V) reports to the Legislature within ten days of receiving the report, please find attached the IV&V report the Office of Enterprise Technology Services received for the State of Hawaii Department of Labor & Industrial Relations Disability Compensation Division’s Modernization Project – Electronic Case Management System.

In accordance with HRS section 93-16, this report may be viewed electronically at http://ets.hawaii.gov (see “Reports”).

Sincerely,

DOUGLAS MURDOCK
Chief Information Officer
State of Hawai‘i

Attachment (1)
Disability Compensation Division’s Modernization Project – Electronic Case Management System (eCMS)
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## Document History

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<th>DATE</th>
<th>DESCRIPTION</th>
<th>AUTHOR</th>
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<td>04/07/22</td>
<td>Monthly On-site IV&amp;V Review Report Draft created</td>
<td>Julia Okinaka</td>
<td>0.0</td>
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<tr>
<td>05/03/22</td>
<td>Monthly On-site IV&amp;V Review Report Final updated for corrections of documents in Appendix C and to reflect no comments submitted in Appendix F.</td>
<td>Julia Okinaka</td>
<td>1.0</td>
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EXECUTIVE SUMMARY

BACKGROUND

The State of Hawaii (State), Department of Labor and Industrial Relations (DLIR) contracted DataHouse Consulting, Inc. (DataHouse) for the Disability Compensation Division’s (DCD) Electronic Case Management System Project (eCMS Project). DLIR contracted Accuity LLP (Accuity) to provide Independent Verification and Validation (IV&V) services for the eCMS Project.

The Initial On-Site IV&V Review Report (IV&V Initial Report) was issued on August 30, 2019 and provided an initial assessment of project health as of June 30, 2019. Refer to the full Initial Report for additional background information on the eCMS Project and IV&V. The Monthly On-Site IV&V Review Reports (IV&V Monthly Reports) build upon the Initial Report to update and continually evaluate project progress and performance. Refer to Appendix E: Prior IV&V Reports for a listing of prior reports.

The focus of our IV&V activities for this report included the completion of a two-month assessment of cost management, organizational change management, and system operations and the beginning of a two-month assessment of configuration management. IV&V has areas of limited visibility or access to project activities and documentation that may prevent a complete identification of project risks.

The IV&V Dashboard on the following two pages provides a quick visual and narrative snapshot of both the project status and project assessment as of March 23, 2022. Additional explanation is included in Findings and Recommendations by Assessment Area for new findings and in Appendix D: Prior Findings Log for prior report findings. Refer to Appendix A: IV&V Criticality and Severity Ratings for an explanation of the ratings.

“Clarity and simplicity are the antidotes to complexity and uncertainty.”

- General George Casey
**Executive Summary**

**PROJECT ASSESSMENT**

**SUMMARY RATINGS**

**OVERALL RATING**

Significant severe deficiencies were observed requiring immediate remediation or risk mitigation.

**PROGRAM GOVERNANCE**

**PROJECT MANAGEMENT**

**TECHNOLOGY**

**CRITICALITY RATINGS**

**PROJECT PROGRESS**

**PROJECT 2 60%**

**PROJECT 1 48%**

**SEVERITY RATINGS BY ASSESSMENT AREA**

**PROJECT BUDGET**

* Only includes contracts. IV&V unable to validate total budget.

**PROJECT BUDGET**

**45 OPEN RECOMMENDATIONS**

**29 OPEN FINDINGS**

**OVERALL RATING**

**AS OF MARCH 23, 2022**

**SEVERITY RATINGS BY ASSESSMENT AREA**

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<tr>
<th>JAN</th>
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<th>MAR</th>
<th>IV&amp;V ASSESSMENT AREA</th>
<th>IV&amp;V OBSERVATIONS</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Overall</td>
<td>While the eCMS Project continues to move forward, status of existing obstacles are pending or unknown. Greater clarity is needed around status, plans, revised schedule, processes, metrics, and criteria.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td><em>Project Schedule:</em> Phase 2 is generally on track and slightly ahead of schedule. Phase 1 Case Management and Phase 3 tasks are delayed. Approval of a revised project schedule is still pending. Accuity is unable to fully assess schedule variances (refer to finding 2019.07.PM13).</td>
</tr>
<tr>
<td></td>
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<td></td>
<td><em>Project Costs:</em> Contract costs are within the total contract amounts. DataHouse is prepaid for Phase 1 and 2 but is adjusting Phase 3 invoices under the revised payment schedule. Accuity is unable to fully assess cost variances (refer to finding 2019.07.PM12).</td>
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<tr>
<td></td>
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<td></td>
<td><em>Quality:</em> DLIR and DataHouse continue to address system issues in production for Phase 1 Content Management and during user acceptance testing (UAT) for Phase 1 Case Management. Quality metrics still need to be defined and collected (refer to finding 2019.07.IT05).</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Program Governance</td>
<td>The eCMS Project Executive Steering Committee (ESC) meeting was canceled for the month of March. Guidance and active involvement from project governance is needed to oversee major risks and issues, drive progress, enforce accountability, and reassess overall project priorities and goals.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>Project Management</td>
<td>A revised project schedule was developed but is still pending full DLIR and ESC approval. Proposed revisions will defer the Phase 1 Case Management go-live to June 2022, accelerate the Phase 2 go-live to November 2022, and compress the Phase 3 timeline. The Phase 1 Case Management proposed June 2022 go-live is still quickly approaching. It is critical that plans for Phase 1 Case Management go-live are clarified and finalized including go-live communication activities for external stakeholders, training format and dates, organizational change management (OCM) activities and metrics, and business processes around the new system. Phase 3 requirements sessions resumed and the requirements deliverable was deferred to the end of March 2022. DLIR improved processes to monitor, engage, and acquire resources and trace requirements to testing and acceptance. DLIR and DataHouse should continually reassess and adjust foundational project management processes (refer to Appendix D: Prior Findings Log) to prevent future delays and improve project performance.</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Technology</td>
<td>Phase 1 Content Management technical system issues continue to be addressed but the complete status of issue resolution, root cause of those issues, status of user adoption, plans to address transition issues, and system operation roles, procedures, and metrics remain unclear. Improvements are needed for many foundational technology processes (refer to Appendix D: Prior Findings Log). IV&amp;V does not have adequate visibility of DataHouse development, testing, and data conversion activities. Phase 1 Case Management UAT progresses but is still behind initial forecasts. The Phase 1 Case Management go/no-go criteria or transition checklist are also still pending. DataHouse is completing Phase 2 development sprints ahead of schedule.</td>
</tr>
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FINDINGS AND RECOMMENDATIONS BY ASSESSMENT AREA

OVERALL RATING

The overall rating is assigned based on the criticality ratings of the IV&V Assessment Categories and the severity ratings of the underlying findings (see Appendix A: IV&V Criticality and Severity Ratings). The tables below summarize the criticality ratings for each IV&V Assessment Category in the three major IV&V Assessment Areas. One IV&V Assessment Category improved and one declined from the prior report. Greater clarity is needed around status, plans, revised schedule, processes, metrics, and criteria for Phase 1 Content Management user adoption and system operation as well as Phase 1 Case Management acceptance and deployment. Continuous improvements are needed for many foundational project management and technology processes.

<table>
<thead>
<tr>
<th>JAN</th>
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<th>PROGRAM GOVERNANCE</th>
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<td>🟢</td>
<td>Governance Effectiveness</td>
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<td>🟢</td>
<td>🟢</td>
<td>Project Organization and Management</td>
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<td>🟠</td>
<td>🟠</td>
<td>Benefits Realization</td>
<td>🟡</td>
<td>🟡</td>
<td>🟡</td>
<td>Scope and Requirements Management</td>
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<td>🟢</td>
<td>🟢</td>
<td>System Software, Hardware, and Integrations</td>
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<td>Cost, Schedule, and Resource Management</td>
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<td>Design</td>
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<td>Data Conversion</td>
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<td>Organizational Change Management (OCM)</td>
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<td>Configuration Management</td>
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<td>Business Process Reengineering (BPR)</td>
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<td>Security</td>
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<td>🟠</td>
<td>🟠</td>
<td>Training and Knowledge Transfer</td>
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KEY PROGRESS
Case Management UAT PROGRESSING
Phase 2 development AHEAD OF SCHEDULE
Phase 3 requirements sessions RESUMED

KEY RISKS
GREATER CLARITY in metrics, plans, and processes is critical
LOW Content Management USER ADOPTION
CONTINUOUS reassessment and adjustment needed
## PROGRAM GOVERNANCE

<table>
<thead>
<tr>
<th>JAN</th>
<th>FEB</th>
<th>MAR</th>
<th>IV&amp;V ASSESSMENT CATEGORY</th>
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<th>FINDINGS</th>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Governance Effectiveness</td>
<td>The eCMS Project Executive Steering Committee (ESC) was not able to meet this month to discuss project updates, risks, and issues. Continued project guidance and oversight is needed to oversee major risks and issues, drive progress, and enforce accountability (2021.05.PG01). The DataHouse wellness plan is expected to be provided in April 2022.</td>
<td>0 1 0</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Benefits Realization</td>
<td>No significant updates since the prior report. Project success metrics should be reevaluated to take into consideration the current project status and to focus on what can be realistically achieved in the remaining project timeline. DLIR also needs to begin collecting and monitoring success metrics data (2019.07.PG05).</td>
<td>0 1 0</td>
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## PROJECT MANAGEMENT

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<tbody>
<tr>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Project Organization and Management</td>
<td>Project organization and management continue to be a challenge. While the eCMS Project continues to move forward, greater clarity is needed around status, plans, schedule, processes, and metrics, especially for the quickly approaching Phase 1 Case Management go-live. DLIR and DataHouse need to maintain their increased collaboration and coordination to avoid further project constraints (2019.07.PM02). Improvements are still needed for deliverable review process (2019.07.PM03) and to address prior IV&amp;V findings or lessons learned (2020.07.PM01).</td>
<td>NEW 0</td>
</tr>
<tr>
<td>0</td>
<td>0</td>
<td>0</td>
<td>Scope and Requirements Management</td>
<td>Requirements continue to be clarified and refined during Phase 1 UAT and Phase 2 development. Phase 3 requirements gathering is resumed and the requirements deliverable was deferred to the end of March 2022. DLIR improved processes to trace requirements to testing and acceptance but additional improvements in requirement traceability (2019.10.PM01) and requirements management processes (2019.07.PM10) are needed.</td>
<td>OPEN 2</td>
</tr>
</tbody>
</table>
## Cost, Schedule, and Resource Management

Phase 1 Case Management and Phase 3 tasks are delayed. Phase 2 is generally on track and slightly ahead of schedule. A revised project schedule was developed but is still pending full DLIR and ESC approval. Proposed revisions will defer the Phase 1 Case Management go-live to June 2022, accelerate the Phase 2 go-live to November 2022, and compress the Phase 3 timeline. The Phase 1 Case Management proposed June 2022 go-live is still quickly approaching and it is critical that plans and related tasks are clarified and finalized in order to stay on track with a new schedule. Additionally, the proposed project schedule should be reassessed based on the latest status of underlying tasks to ensure that the proposed schedule is still realistic and achievable. Improvements in schedule management practices (2019.07.PM13) are needed to monitor progress and prevent further delays.

DLIR is in the process of procuring additional resources (2019.07.PM14). Resource engagement and ownership also improved. DLIR should continue exploring other resource management strategies (2019.09.PM02) to increase pace of work.

Contract costs are within the total contract amounts. DataHouse is prepaid for Phase 1 and 2 but is adjusting Phase 3 invoices under the revised payment schedule. Improvements in cost management processes (2019.07.PM12) are needed to track and monitor other project costs.

## Risk Management

DLIR and DataHouse are still working to address Phase 1 Content Management risks and issues but the time and effort that continues to be spent on Content Management is creating risks and issues for other phases. Risk mitigation plans for other phases of the project, especially the upcoming Phase 1 Case Management go-live, need to be developed and implemented (2019.07.PM09).
## Findings and Recommendations

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</table>
|     |     |     | Communications Management | **FINDINGS**
Communications Management continues to improve with weekly briefings to communicate project status and upcoming activities. DLIR is in the process of procuring an additional resource that will help to develop a communications plan for external stakeholders (2019.07.PM07), which is also needed for the upcoming Phase 1 Case Management go-live. Continued open and transparent dialogue between all DLIR and DataHouse team members (2019.07.PM06) is critical for smooth and timely project execution. | **NEW** 2 **OPEN** 0 **CLOSED** 0 |
|     |     |     | Organizational Change Management (OCM) | **FINDINGS**
OCM updates are emailed to stakeholders on a weekly basis. DLIR began to develop an OCM plan, surveys, and metrics to measure user participation and system utilization. Engagement and ownership from DLIR resources improved. Additional OCM plans and strategies (2019.07.PM08) are needed for other phases, including the upcoming Phase 1 Case Management go-live. | **NEW** 0 **OPEN** 1 **CLOSED** 0 |
|     |     |     | Business Process Reengineering (BPR) | **FINDINGS**
DLIR continues to clarify business processes during UAT. Content Management business processes for the DCD stakeholder groups as well as the significantly more complex Phase 1 Case Management business processes still need to be clarified (2020.12.PM01). Improvements are also needed to discuss, prioritize, and analyze BPR opportunities (2021.08.PM01). | **NEW** 0 **OPEN** 2 **CLOSED** 0 |
|     |     |     | Training and Knowledge Transfer | **FINDINGS**
DLIR continues to update Phase 1 Content Management and Case Management training materials for end users and system administrators to incorporate information learned during UAT. DLIR testing leads also continue to provide supplemental training. The training format and dates for the upcoming Phase 1 Case Management go-live still need to be determined. | **NEW** 0 **OPEN** 0 **CLOSED** 0 |
### Findings and Recommendations

#### Technology

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<td></td>
<td><strong>System Software, Hardware, and Integrations</strong></td>
<td>Phase 1 Content Management technical system issues continue to be addressed but the complete status of issue resolution, root cause of those issues, status of user adoption, plans to address transition issues (2022.02.IT01), and system operation roles, procedures, and metrics (2019.09.IT02) remain unclear. The go/no-go checklist and revised go-live date for Phase 1 Case Management is still pending. It is critical for the go/no-go checklist and deployment activities to be finalized (2020.09.IT01) due to the significantly increased complexity of the system and higher number of internal and external stakeholders that will require greater coordination and longer lead times. DataHouse is completing Phase 2 development sprints ahead of schedule. The Phase 2 interface solution is still unclear (2019.07.IT02).</td>
<td>NEW 0 OPEN 4 CLOSED 0</td>
</tr>
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<td></td>
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<td></td>
<td><strong>Design</strong></td>
<td>No significant updates since the prior report. Further clarification is needed of how BPR opportunities could be addressed through system design (2021.08.PM01) and integration with external systems (2019.07.IT02).</td>
<td>NEW 0 OPEN 0 CLOSED 0</td>
</tr>
<tr>
<td></td>
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<td><strong>Data Conversion</strong></td>
<td>No significant updates since the prior report. Procurement of DLIR data conversion resources is in progress to perform conversion of paper files. Additional clarification of plans to convert paper files (2019.11.IT01) is still needed.</td>
<td>NEW 0 OPEN 2 CLOSED 0</td>
</tr>
</tbody>
</table>
## Quality Management and Testing

Current performance metrics for Phase 1 Case Management testing are still below percentage completion targets (2019.10.IT01). Issues related to permissions settings for DLIR testers largely contributed to the delays. DLIR plans to revise the testing target metrics to align to the new proposed go-live timeline. Additional improvements in prioritizing and addressing UAT execution issues (2020.12.IT01) are also needed. DataHouse is progressing with Phase 2 system testing. DLIR and DataHouse still do not have formal quality management plans (2019.07.IT05). Quality metrics are critical for evaluating and monitoring project activities for acceptance and go-live readiness, which is especially critical for the upcoming Phase 1 Case Management go-live.

## Configuration Management

No significant updates since the prior report. Details of the configuration management plan (2019.07.IT06) including the DLIR approval process and management of concurrent development are pending.

## Security

A comprehensive security management plan (2019.07.IT07), formal security policies (2019.10.IT02), and an M&O plan (2019.09.IT02) are needed for both Phase 1 Content Management system operation as well as future phases, including the upcoming Phase 1 Case Management go-live.
Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

Criticality and severity ratings provide insight on where significant deficiencies are observed and immediate remediation or risk mitigation is required. Criticality ratings are assigned to the overall project as well as each IV&V Assessment Area and IV&V Assessment Category. Severity ratings are assigned to each risk or issue identified.

Criticality Rating

The criticality ratings are assessed based on consideration of the severity ratings of each related risk and issue within the respective IV&V Assessment Area and IV&V Assessment Category, the overall impact of the related findings to the success of the project, and the urgency of and length of time to implement remediation or risk mitigation strategies. Arrows indicate trends in the project assessment from the prior report and take into consideration areas of increasing risk and approaching timeline. Up arrows indicate adequate improvements or progress made. Down arrows indicate a decline, inadequate progress, or incomplete resolution of previously identified findings. No arrow indicates there was neither improving nor declining progress from the prior report.

A **RED**, high criticality rating is assigned when significant severe deficiencies were observed and immediate remediation or risk mitigation is required.

A **YELLOW**, medium criticality rating is assigned when deficiencies were observed that merit attention. Remediation or risk mitigation should be performed in a timely manner.

A **GREEN**, low criticality rating is assigned when the activity is on track and minimal deficiencies were observed. Some oversight may be needed to ensure the risk stays low and the activity remains on track.

A **GRAY** rating is assigned when the category being assessed has incomplete information available for a conclusive observation and recommendation or is not applicable at the time of the IV&V review.

**TERMS**

**RISK**
An event that has not happened yet.

**ISSUE**
An event that is already occurring or has already happened.
**Severity Rating**

Once risks are identified and characterized, Accuity will examine project conditions to determine the probability of the risk being identified and the impact to the project, if the risk is realized. We know that a risk is in the future, so we must provide the probability and impact to determine if the risk has a Risk Severity, such as Severity 1 (High), Severity 2 (Moderate), or Severity 3 (Low).

While a risk is an event that has not happened yet, an issue is something that is already occurring or has already happened. Accuity will examine project conditions and business impact to determine if the issue has an Issue Severity, such as Severity 1 (High/Critical Impact/System Down), Severity 2 (Moderate/Significant Impact), or Severity 3 (Low/Normal/Minor Impact/Informational).

Findings that are positive or preliminary concerns are not assigned a severity rating.

---

**TERMS**

**POSITIVE**
Celebrates high performance or project successes.

**PRELIMINARY CONCERN**
Potential risk requiring further analysis.

---

**SEVERITY 1**: High/Critical level

**SEVERITY 2**: Moderate level

**SEVERITY 3**: Low level
### Appendix B: Industry Standards and Best Practices

<table>
<thead>
<tr>
<th>STANDARD</th>
<th>DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>ADA</td>
<td>Americans with Disabilities Act</td>
</tr>
<tr>
<td>ADKAR®</td>
<td>Prosci ADKAR: Awareness, Desire, Knowledge, Ability, and Reinforcement</td>
</tr>
<tr>
<td>BABOK® v3</td>
<td>Business Analyst Body of Knowledge</td>
</tr>
<tr>
<td>DAMA-DMBOK® v2</td>
<td>DAMA International's Guide to the Data Management Body of Knowledge</td>
</tr>
<tr>
<td>HIPAA</td>
<td>Health Insurance Portability and Accountability Act of 1996</td>
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<tr>
<td>MARS-E v2.0</td>
<td>CMS Minimum Acceptable Risk Standards for Exchanges – Exchange Reference Architecture Supplement</td>
</tr>
<tr>
<td>MITA v3.0</td>
<td>Medicaid Information Technology Architecture</td>
</tr>
<tr>
<td>PMBOK® v7</td>
<td>Project Management Institute (PMI) Project Management Body of Knowledge</td>
</tr>
<tr>
<td>SWEBOK v3</td>
<td>Guide to the Software Engineering Body of Knowledge</td>
</tr>
<tr>
<td>TOGAF® v9.2</td>
<td>The Open Group Architecture Framework Standard</td>
</tr>
<tr>
<td>COBIT® 2019 Framework</td>
<td>Control Objectives for Information and Related Technologies Framework</td>
</tr>
<tr>
<td>IEEE 828-2012</td>
<td>Institute of Electrical and Electronics Engineers (IEEE) Standard for Configuration Management in Systems and Software Engineering</td>
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<tr>
<td>IEEE 1062-2015</td>
<td>IEEE Recommended Practice for Software Acquisition</td>
</tr>
<tr>
<td>IEEE 1012-2016</td>
<td>IEEE Standard for System, Software, and Hardware Verification and Validation</td>
</tr>
<tr>
<td>STANDARD</td>
<td>DESCRIPTION</td>
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<tr>
<td>------------------</td>
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<td>STANDARD</td>
<td>DESCRIPTION</td>
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<tr>
<td>--------------------------------</td>
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</tr>
<tr>
<td>SAML v2.0</td>
<td>Security Assertion Markup Language v2.0</td>
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<tr>
<td>SoaML v1.0.1</td>
<td>Service Oriented Architecture Modeling Language</td>
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<tr>
<td>CMMI-DEV v1.3</td>
<td>Capability Maturity Model Integration for Development</td>
</tr>
<tr>
<td>FIPS 200</td>
<td>FIPS Publication 200, Minimum Security Requirements for Federal Information and Information Systems</td>
</tr>
<tr>
<td>NIST 800-53 Rev 5</td>
<td>National Institute of Standards and Technology (NIST) Security and Privacy Controls for Federal Information Systems and Organizations</td>
</tr>
<tr>
<td>NIST Cybersecurity Framework v1.1</td>
<td>NIST Framework for Improving Critical Infrastructure Cybersecurity</td>
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<tr>
<td>LSS</td>
<td>Lean Six Sigma</td>
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# Appendix C: Interviews, Meetings, and Documents

## Interviews

<table>
<thead>
<tr>
<th>DATE</th>
<th>INTERVIEWEE</th>
</tr>
</thead>
<tbody>
<tr>
<td>03/01/22</td>
<td>Interview with DCD Stakeholder</td>
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</table>

## Meetings

<table>
<thead>
<tr>
<th>DATE</th>
<th>MEETING DESCRIPTION</th>
</tr>
</thead>
<tbody>
<tr>
<td>02/28/22</td>
<td>IV&amp;V DCD Update Meeting</td>
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<tr>
<td>02/28/22</td>
<td>Weekly DCD Risk Meeting</td>
</tr>
<tr>
<td>02/28/22</td>
<td>DCD OCM Update Meeting</td>
</tr>
<tr>
<td>03/01/22</td>
<td>PM Status Meeting</td>
</tr>
<tr>
<td>03/01/22</td>
<td>Case Management UAT Stand-Up</td>
</tr>
<tr>
<td>03/01/22</td>
<td>OCM Working Session</td>
</tr>
<tr>
<td>03/02/22</td>
<td>IV&amp;V DCD Update Meeting</td>
</tr>
<tr>
<td>03/03/22</td>
<td>PM Status Meeting</td>
</tr>
<tr>
<td>03/03/22</td>
<td>Phase 3 Case Management Requirements</td>
</tr>
<tr>
<td>03/03/22</td>
<td>Case Management UAT Stand-Up</td>
</tr>
<tr>
<td>03/04/22</td>
<td>IV&amp;V Report Draft Walkthrough</td>
</tr>
<tr>
<td>03/07/22</td>
<td>IV&amp;V DCD Update Meeting</td>
</tr>
<tr>
<td>03/07/22</td>
<td>Weekly DCD Risk Meeting</td>
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<tr>
<td>03/07/22</td>
<td>LIRAB Touchpoint Meeting</td>
</tr>
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<td>03/08/22</td>
<td>PM Status Meeting</td>
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### MEETINGS (CONTINUED)

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<tr>
<th>DATE</th>
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<tr>
<td>03/08/22</td>
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<td>03/10/22</td>
<td>PM Status Meeting</td>
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<td>03/10/22</td>
<td>Case Management UAT Stand-Up</td>
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<tr>
<td>03/10/22</td>
<td>eCMS Testing Roundtable</td>
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<tr>
<td>03/11/22</td>
<td>eCMS Content Management Operation Metrics</td>
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<td>03/14/22</td>
<td>OCM Touchpoint Meeting</td>
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<td>eCMS Testing Roundtable</td>
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<td>03/16/22</td>
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<td>03/22/22</td>
<td>eCMS Testing Roundtable</td>
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<tr>
<td>03/23/22</td>
<td>Content Management Quality Log and Helpdesk Issues Review</td>
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### MEETINGS (CONTINUED)

<table>
<thead>
<tr>
<th>DATE</th>
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<tr>
<td>03/23/22</td>
<td>IV&amp;V DCD Update Meeting</td>
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### DOCUMENTS

<table>
<thead>
<tr>
<th>TYPE</th>
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<tbody>
<tr>
<td>Request for Proposal</td>
<td>State of Hawaii DLIR DCD RFP No. RFP-17-002-DCD (Release Date 04/12/18)</td>
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<tr>
<td>DataHouse Proposal</td>
<td>DataHouse eCMS Best and Final Offer (BAFO) Proposal (Dated 06/20/18)</td>
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<td>Request for Proposal</td>
<td>State of Hawaii DLIR DCD IV&amp;V RFP No. RFP-18-001-DCD (Release Date 12/28/18)</td>
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<tr>
<td>Contract</td>
<td>Contract between State of Hawaii and DataHouse Consulting Inc. (Effective 08/27/18)</td>
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<td>Design</td>
<td>Design of Form TDI-46 Denial of Claim for Disability Benefits (03/22/22)</td>
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<td>Forms</td>
<td>HC-15 Health Care Contractor Report (rev 03/2022)</td>
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<tr>
<td>Development</td>
<td>Content Management Operations Documentation Version 1.0 (03/13/22, pending DLIR approval)</td>
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<tr>
<td>Development</td>
<td>Case Management Phase 2 Build Burndown (03/03/22, 03/17/22)</td>
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<tr>
<td>Development</td>
<td>DataHouse Development Team Status Meeting Minutes (02/23/22, 03/02/22, 03/09/22, 03/16/22)</td>
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<tr>
<td>Development</td>
<td>Data Layout for Carrier Electronic Filing</td>
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<tr>
<td>Governance</td>
<td>eCMS ESC Meeting Minutes (02/11/22)</td>
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<td>OCM</td>
<td>OCM Agenda (02/28/22, 03/14/22)</td>
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<td>OCM</td>
<td>DCD eCMS Modernization Project Update (03/02/22, 03/09/22)</td>
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<td>Quality</td>
<td>Content Management Quality Tracking Log (03/20/22)</td>
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<td>Metrics for Content Management Quality Tracking Log (03/20/22)</td>
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<tr>
<td>Requirements</td>
<td>Requirements Traceability Matrix (RTM) (03/23/22)</td>
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## DOCUMENTS (CONTINUED)

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<tbody>
<tr>
<td>Requirements</td>
<td>Phase 3 Case Management Requirements Gathering Meeting Notes for 03/17/22</td>
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<tr>
<td>Risk and Issues</td>
<td>RAID (Risk Action Issue Decision) Log (Updated 03/23/22 by DataHouse Project Manager)</td>
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<tr>
<td>Risk and Issues</td>
<td>RAID Log (Updated 03/23/22 by DCD Project Manager)</td>
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<td>Costs</td>
<td>DCD eCMS Modernization Project – Services (03/23/22)</td>
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<td>Costs</td>
<td>eCMS AWS Costs and Operations (03/23/22)</td>
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<td>Schedule</td>
<td>eCMS Microsoft Project Plan as of 03/19/22 (MPP file)</td>
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<tr>
<td>Schedule</td>
<td>Filtered Project Plans (Late Tasks, Upcoming 4 weeks) (02/28/22, 03/08/22, 03/15/22)</td>
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<td>BPR</td>
<td>DLIR Business Process Improvement Opportunities Log (03/23/22)</td>
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<td>Testing</td>
<td>Case Management Test Cases (03/23/22)</td>
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<td>Case Management UAT Metrics (03/23/22)</td>
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<td>Case Management UAT Salesforce Bug Tracker Export (03/20/22)</td>
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<td>Case Management Feedback on Award Worksheet (03/23/22)</td>
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<td>Phase 2 Case Management Test Cases (03/23/22)</td>
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<td>Testing</td>
<td>Phase 3 Case Management Test Cases (03/23/22)</td>
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<td>DCD Content Management Training Guides (03/15/22)</td>
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<td>DCD Case Management Training Guides (03/15/22)</td>
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<td>Training</td>
<td>DCD eCMS Administrator Guides (03/23/22)</td>
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<td>DCD Content Management Data Backup Information (03/23/22)</td>
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<td>Request for Proposal</td>
<td>State of Hawaii DLIR DCD RFP No. RFP-22-03-DCD (Release Date 02/10/22)</td>
</tr>
<tr>
<td>Request for Proposal</td>
<td>State of Hawaii DLIR DCD RFP No. RFP-22-02-DCD (Release Date 02/10/22)</td>
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</table>
Appendix D: Prior Findings Log
The eCMS Phase 1 Content Management system went live on January 26, 2022 and was rolled out to a small number of users in one stakeholder group. In the month since go-live, users have encountered a number of technical issues with the system, including difficulty with login, slow page load times, and issues with data entry. Despite these efforts, user adoption has been low.

ASSESSMENT

<table>
<thead>
<tr>
<th>ORIGINAL</th>
<th>CURRENT</th>
<th>CLOSED</th>
</tr>
</thead>
<tbody>
<tr>
<td>SEVERITY</td>
<td>STATUS</td>
<td>FINDING</td>
</tr>
<tr>
<td>Open</td>
<td>03/23/22:</td>
<td>Phase 1 Content Management technical system issues continue to be identified.</td>
</tr>
<tr>
<td>•Reassess issue/defect reporting processes and tools to improve processes. •Collect and use metrics to help in identifying production issue trends, analyzing system vs. user issues, and investigating root causes.</td>
<td>An assessment of the work to be accomplished in the next iteration of the Content Management implementation has been performed.</td>
<td>10/26/21:</td>
</tr>
<tr>
<td>Open</td>
<td>10/26/21:</td>
<td>DLIR began to track some BPR opportunities in a log.</td>
</tr>
<tr>
<td>01/25/22:</td>
<td>Some BPR opportunities continue to be discussed in Phase 2 development sprint sessions and Phase 3 requirements gathering. Identification of those BPR opportunities with the greatest impact or value is still needed.</td>
<td></td>
</tr>
</tbody>
</table>

In the initial round of Phase 2 design sessions, preliminary design mock-ups were presented and did not seem to completely address the requests and current operational pain points raised by DLIR. BHM failures during the requirements gathering stage. While some features were presented and trialed, they were not fully deployed. Further usability testing is needed to ensure that future features will address the current operational pain points raised by DLIR.

Since December 2020, DLIR and DataHouse have been working to participate in project activities. DataHouse plans to provide more business context during follow-up design sessions. Although this finding is reported under the Business Process Reengineering IV&V Assessment Category, this finding also impacts the criticality rating for Design. In addition to the specific recommendations, it is of a critical nature to address the following recommendations: 1) the way in which project governance communicates to the ESC. 2) the way in which project governance communicates to the DataHouse project sponsors to more closely monitor and drive progress of executing mitigation plans for critical issues.

On 02/24/22 and 03/23/22, the DataHouse Project Sponsor significantly increased involvement and committed additional resources to the project to allow more time for additional analysis. Additional collaboration and more active involvement from the ETS and project sponsors are needed to help resolve these critical issues. 3) the DataHouse Project Sponsor significantly increased involvement and committed additional resources to the project to allow more time for additional analysis. Additional collaboration and more active involvement from the ETS and project sponsors are needed to help resolve these critical issues. 4) the DataHouse Project Sponsor significantly increased involvement and committed additional resources to the project to allow more time for additional analysis. Additional collaboration and more active involvement from the ETS and project sponsors are needed to help resolve these critical issues. 5) the DataHouse Project Sponsor significantly increased involvement and committed additional resources to the project to allow more time for additional analysis. Additional collaboration and more active involvement from the ETS and project sponsors are needed to help resolve these critical issues. 6) the DataHouse Project Sponsor significantly increased involvement and committed additional resources.
Ongoing Phase 1 Content Management UAT is raising questions regarding how the system will be used after interim Content Management go-live as well as the integrated Case Management go-live. The new system may impact testing and go-live readiness.

Open

10/26/21: DLIR reached a decision on a critical Content Management business process but needs to further clarify the process details for the upcoming go-live.
11/29/21: DLIR continues to discuss and clarify some of the Phase 1 Content Management business processes questions that are arising during UAT.

Business Process

2020.12.PM01 Risk Moderate

12/29/21: DLIR is making progress on drafting additional process documentation related to scanning. However, a couple key business processes decisions related to Content Management are still pending and need to be determined due to the upcoming go-live.

Clarify redesigned business processes.

• Identify business processes that need to change with the modernized system.
• Discuss and evaluate options for redesigning identified business processes considering impacts on stakeholders.
• Ensure that communication and training plans are updated for major business process changes.

Business Process

2020.12.PM01.R1

12/29/21: DLIR is making progress on drafting additional process documentation related to scanning. However, a couple key business processes decisions related to Content Management are still pending and need to be determined due to the upcoming go-live.

Clarify redesigned business processes.

• Identify business processes that need to change with the modernized system.
• Discuss and evaluate options for redesigning identified business processes considering impacts on stakeholders.
• Ensure that communication and training plans are updated for major business process changes.

Assessment

ORIGINAL
FINDING
CLOSED

CATEGORY FINDING ID TYPE
SEVERITY FINDING ANALYSIS RECOMMENDATION ID RECOMMENDATION SUPPLEMENTAL RECOMMENDATION STATUS FINDING STATUS UPDATE
DATE CLOSURE REASON

High Outstanding

DLIR and DataHouse should work together to evaluate and prioritize DLIR began UAT of the Phase 1 Content Management solution and is addressing UAT execution issues.

In addition to the specific recommendations made as a part of this finding, the IV&V recommendations made at the finding 2019.10.IT01 will also help to address this issue.

2020.12.IT01.R2

11/29/21: The Phase 1 Content Management timeline was deferred due to technical issues. DataHouse and DLIR are working to resolve the top three issues by early December 2021 prior to the planned go-live.

2020.12.IT01.R3

12/29/21: Performance metrics for both Phase 1 Content Management and Case Management UAT indicate lower than expected progress to complete planned test cases. DLIR does not have sufficient testing resources to consistently perform Content Management or Case Management UAT, and the current testing resources are limited to Case Management testing.

01/25/22: DLIR and DataHouse improved the process for resolving UAT execution issues and for addressing additional testing requirements.

Accuity will continue to assess business process decisions and documentation.

2020.12.PM01.R1

12/29/21: DLIR is making progress on drafting additional process documentation related to scanning. However, a couple key business processes decisions related to Content Management are still pending and need to be determined due to the upcoming go-live.

Clarify redesigned business processes.

• Identify business processes that need to change with the modernized system.
• Discuss and evaluate options for redesigning identified business processes considering impacts on stakeholders.
• Ensure that communication and training plans are updated for major business process changes.

2020.12.IT01.R1

11/29/21: The Phase 1 Content Management timeline was deferred due to technical issues. DataHouse and DLIR are working to resolve the top three issues by early December 2021 prior to the planned go-live.

2020.12.IT01.R2

11/29/21: The Phase 1 Content Management timeline was deferred due to technical issues. DataHouse and DLIR are working to resolve the top three issues by early December 2021 prior to the planned go-live.

2020.12.IT01.R3

12/29/21: Performance metrics for both Phase 1 Content Management and Case Management UAT indicate lower than expected progress to complete planned test cases. DLIR does not have sufficient testing resources to consistently perform Content Management or Case Management UAT, and the current testing resources are limited to Case Management testing.

01/25/22: DLIR and DataHouse improved the process for resolving UAT execution issues and for addressing additional testing requirements.

Accuity will continue to assess business process decisions and documentation.
**Identified Deficiencies for Foundation Project Processes**

<table>
<thead>
<tr>
<th>Finding ID</th>
<th>Description</th>
<th>Severity</th>
<th>Recommendation</th>
<th>Status Update</th>
</tr>
</thead>
<tbody>
<tr>
<td>2019.09.PM01.R1</td>
<td>Establish go/no-go criteria in advance of the go-live decision to allow for early deferral of efforts.</td>
<td>High</td>
<td>Establish go/no-go criteria and acceptance criteria</td>
<td>03/23/22: No updates to report. Accuity will evaluate the criteria as finalized.</td>
</tr>
<tr>
<td>2019.10.PM01.R1</td>
<td>Refer to prior IV&amp;V Monthly Report for status updates before October 2021.</td>
<td>High</td>
<td>IV&amp;V identified a number of risks and issues since the IV&amp;V Initial Report in July 2019 related to foundational project processes. Some of the more critical areas requiring improvements include: project scope, schedule management, resource management, requirements management, change management, data management, and testing. These areas impact many aspects of the project's execution and are typically affected in overall project performance and project success. Identified deficiencies are listed in project plans experienced in Phase 1. For example, a significant amount of time was spent clarifying the scope of the project, which can affect overall project performance and project success.</td>
<td>02/24/22: A lessons learned meeting for Phase 1 Content Management was conducted. Developing and executing a plan to address the deficiencies identified during the lessons learned discussion will better position the project to handle and adjust to changes going into other phases. The wellness plan is still pending.</td>
</tr>
<tr>
<td>2019.09.PM02.R1</td>
<td>Improve DLIR understanding of the data conversion process.</td>
<td>Moderate</td>
<td>Estimate data conversion test resource needs and ensure adequate resources are identified, trained, and scheduled (refer to findings 2019.09.PM02 and 2019.07.PM14).</td>
<td>01/25/22: Procurement of DLIR data conversion resources is in progress to perform conversion of paper files. The procurement covers open cases and closed cases for the last 30 years. The project is expected to be provided in April 2022. Addressing these previously identified deficiencies and lessons learned from the Phase 1 Content Management go-live are critical to properly prepare for the upcoming and more complex Phase 1 Case Management go-live. Security will continue to evaluate progress to address open findings.</td>
</tr>
<tr>
<td>2019.11.PM01.R3</td>
<td>Finalize DLIR Case Management data conversion plans.</td>
<td>Moderate</td>
<td>Ensure data conversion test resource needs and ensure adequate and required resources are identified and scheduled to facilitate testing (2019.11.PM02 and 2019.11.PM03).</td>
<td>02/24/22 and 03/23/22: No updates to report. Accuity will continue to evaluate progress to address open findings.</td>
</tr>
</tbody>
</table>
10/26/21: DataHouse continues to make updates to the RTM for changes in underlying deliverables using the same methodology described in the October 2021 IV&V report. DataHouse is using the contract requirements to develop test cases for upcoming Phase 1 Content Management and Case Management UAT. DLIR is using the same approach to develop test cases for the Phase 1 Content Management and Case Management UAT.

11/29/21: DLIR is creating UAT test cases from original contract requirements as a way to mitigate missing requirements. The test cases reference the source of the requirement which helps to provide some additional traceability.

01/25/22, 02/24/22, and 03/23/22: No updates to report.

2019.10.PM01 Risk High Moderate The current RTM documentation and tool may hinder traceability, which may impact the ability to ensure that the overall eCMS solution fulfills all requirements and provides context for the design, development, and testing of the project.

- **Identify applicable test standards and requirements.**
- **Delineate roles and responsibilities between DataHouse and DLIR (refer to finding 2019.07.PM02).**
- **Estimate test resource needs and ensure adequate resources are identified, trained, and scheduled (refer to findings 2019.09.PM02 and 2019.07.PM14).**

2019.10.IT01 Issue High High Lack of approved test plans may impact the execution and quality of test activities and documentation.

- **Finalize the test plan.**
- **Quality and Testing management and testing.**

2019.10.IT02 Risk High High Security 2019.10.IT02 Issue High High Lack of formalized security policies and procedures. DLIR does not have security policies and procedures in place to adequately protect the eCMS Project from unauthorized access, data breaches, and other security threats.

- **Formalize security policies.**
- **Work with ETS to align DLIR policies with State policies and/or a standard security framework.**
- **Consider prioritizing security policies that are most relevant for use of cloud services and data protection (e.g., security logging and monitoring, MFA, remote access, encryption of data-at-rest and data-in-transit).**

2019.10.IT02.R1 Formalize security policies. •Consider prioritizing security policies that are most relevant for use of cloud services and data protection (e.g., security logging and monitoring, MFA, remote access, encryption of data-at-rest and data-in-transit) to prevent further delay of the project.

2019.10.IT02.R2 Formalize and implement security procedures.

- **Clarify roles and responsibilities for security controls between DLIR and DataHouse (refer to finding 2019.07.PM02).**

2019.10.IT02 Issue High High Lack of formalized security policies and procedures may affect the security plan and may hinder traceability, which may impact the ability to ensure the overall eCMS solution fulfills all requirements and provides context for the design, development, and testing of the project.

- **Formalize and implement security procedures.**
- **Consider prioritizing security policies that are most relevant for use of cloud services and data protection (e.g., security logging and monitoring, MFA, remote access, encryption of data-at-rest and data-in-transit) to prevent further delay of the project.**
**Resource Management**

### Findings

**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.09.PM02.R1 | Develop procedures to estimate and refine resource requirements. Processes and procedures may result in unidentified resource requirements, inadequate resources, or project resources that are not optimally utilized.

**RECOMMENDATION**

- Detail necessary steps and information needed to estimate and refine resource requirements.
- Consider working with managers of project resources to reassign team members' other job duties.
- Consider periodically reconfirming and renewing resource commitments to the project.
- Ensure all resources are properly trained and prepared to plan assignments.
- Explore use of tools for resource calendars and tracking of team member assignment progress and completion.

**Supplemental Recommendations**

- Explore options for obtaining support.
- This was originally reported in the September 2019 IV&V Monthly Report.

---

**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.09.IT02.R1 | Clarify M&O roles and responsibilities.

**RECOMMENDATION**

- Accuity will continue to evaluate M&O as roles and responsibilities are clarified.
- Refer to prior IV&V Monthly Report for status updates before October 2021.

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**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.07.PG05.R2 | Collect baseline and project performance data.

**RECOMMENDATION**

- Consider methods for collecting data such as surveys, queries, observation, open forums, or actual performance testing.
- Consider sources of data such as legacy systems, operations, and internal and external stakeholders.

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**FINDING ID** | **RECOMMENDATION**
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2019.07.PG05 | Collection and measurement of performance data.

**RECOMMENDATION**

- This report does not document a project success factor that is essential to the project being able to perform as intended. Performance indicators (KPIs) are important for evaluating the success of the project. Based on internal recommendations.
- Approval of the project plan.
- Performance Measurement.
- Employee satisfaction.
- Project completion

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**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.07.PG05.R1 | Collection and measurement of performance data.

**RECOMMENDATION**

- Consider financial, nonfinancial, tangible, and intangible metrics such as operational Key Performance Indicators (KPIs), customer or employee satisfaction, user adoption, return on investment, and organizational change management, and benefits realization management objectives as well as alignment to DLIR goals.

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**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.07.PG05.R3 | Identify key project success factors.

**RECOMMENDATION**

- Escalate any shared responsibility with ETS and enterprise tools.
- This was originally reported in the September 2019 IV&V Monthly Report.

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**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.07.PG05.R4 | Develop baseline and project performance data.

**RECOMMENDATION**

- Detail the baseline and initial project performance data.
- Escalate any shared responsibility with ETS and enterprise tools.

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**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.07.PG05.R5 | Develop project management plans and practices.

**RECOMMENDATION**

- Escalate any shared responsibility with ETS and enterprise tools.

---

**FINDING ID** | **RECOMMENDATION**
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2019.07.PG05.R6 | Develop project management plans and practices.

**RECOMMENDATION**

- Escalate any shared responsibility with ETS and enterprise tools.

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**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.07.PG05.R7 | Develop project management plans and practices.

**RECOMMENDATION**

- Escalate any shared responsibility with ETS and enterprise tools.

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**FINDING ID** | **RECOMMENDATION**
--- | ---
2019.07.PG05.R8 | Develop project management plans and practices.

**RECOMMENDATION**

- Escalate any shared responsibility with ETS and enterprise tools.

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### Project Organization and Management

**2019.07.PM02**

**Title:** 2019.07.PM02 Issue

**Description:** The current project management organization may hinder project performance.

**Recommendation:** Improve the project organization to better handle project activities. DLIR and DataHouse project team members appear to work as separate entities instead of as a team. DataHouse works almost exclusively outside the DLIR project office, which reduces collaboration and coordination. The current project organization needs to be reassessed to ensure that all stakeholders have clear roles and responsibilities, and that the project organization supports effective communication and coordination.

**Action:** The current project organization may hinder project performance. Consider revising the project organization to ensure clear roles and responsibilities for each project team member. The project organization should be reassessed to ensure that all stakeholders have clear roles and responsibilities, and that the project organization supports effective communication and coordination.

**Recommendation Analysis:** The current project organization may hinder project performance. Consider revising the project organization to ensure clear roles and responsibilities for each project team member. The project organization should be reassessed to ensure that all stakeholders have clear roles and responsibilities, and that the project organization supports effective communication and coordination.

**Recommendation:** The current project organization may hinder project performance. Consider revising the project organization to ensure clear roles and responsibilities for each project team member. The project organization should be reassessed to ensure that all stakeholders have clear roles and responsibilities, and that the project organization supports effective communication and coordination.

**Follow-Up:**
- **2019.07.PM02.R1** 2019.07.PM02.R1 Clarify roles and responsibilities between DLIR and DataHouse.
- **2019.07.PM02.R2** 2019.07.PM02.R2 The DataHouse Project Manager should work onsite at DLIR through project completion to improve DLIR and DataHouse project team cohesion.

**Status:**
- **Closed** Date of Closure: 10/26/21
- **Closed** Date of Reason: 10/26/21: There were improvements in collaboration between DLIR and DataHouse. The DataHouse Project Manager began working onsite at DLIR in October 2019 to improve DLIR and DataHouse project team cohesion. The DataHouse Project Manager continued to work onsite at DLIR through project completion.

**Supplemental Recommendation:**
- **2019.07.PM02.R3** Include DLIR in project activities and communications to increase DLIR and DataHouse project team cohesion.

**Recommendation Analysis:** The current project organization may hinder project performance. Consider revising the project organization to ensure clear roles and responsibilities for each project team member. The project organization should be reassessed to ensure that all stakeholders have clear roles and responsibilities, and that the project organization supports effective communication and coordination.

**Follow-Up:**
- **2019.07.PM02.R1** 2019.07.PM02.R1 Clarify roles and responsibilities between DLIR and DataHouse.
- **2019.07.PM02.R2** 2019.07.PM02.R2 The DataHouse Project Manager should work onsite at DLIR through project completion to improve DLIR and DataHouse project team cohesion.

**Status:**
- **Closed** Date of Closure: 10/26/21
- **Closed** Date of Reason: 10/26/21: There were improvements in collaboration between DLIR and DataHouse. The DataHouse Project Manager began working onsite at DLIR in October 2019 to improve DLIR and DataHouse project team cohesion. The DataHouse Project Manager continued to work onsite at DLIR through project completion.

**Supplemental Recommendation:**
- **2019.07.PM02.R3** Include DLIR in project activities and communications to increase DLIR and DataHouse project team cohesion.

**Recommendation Analysis:** The current project organization may hinder project performance. Consider revising the project organization to ensure clear roles and responsibilities for each project team member. The project organization should be reassessed to ensure that all stakeholders have clear roles and responsibilities, and that the project organization supports effective communication and coordination.

**Follow-Up:**
- **2019.07.PM02.R1** 2019.07.PM02.R1 Clarify roles and responsibilities between DLIR and DataHouse.
- **2019.07.PM02.R2** 2019.07.PM02.R2 The DataHouse Project Manager should work onsite at DLIR through project completion to improve DLIR and DataHouse project team cohesion.

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**Supplemental Recommendation:**
- **2019.07.PM02.R3** Include DLIR in project activities and communications to increase DLIR and DataHouse project team cohesion.

**Recommendation Analysis:** The current project organization may hinder project performance. Consider revising the project organization to ensure clear roles and responsibilities for each project team member. The project organization should be reassessed to ensure that all stakeholders have clear roles and responsibilities, and that the project organization supports effective communication and coordination.

**Follow-Up:**
- **2019.07.PM02.R1** 2019.07.PM02.R1 Clarify roles and responsibilities between DLIR and DataHouse.
- **2019.07.PM02.R2** 2019.07.PM02.R2 The DataHouse Project Manager should work onsite at DLIR through project completion to improve DLIR and DataHouse project team cohesion.

**Status:**
- **Closed** Date of Closure: 10/26/21
- **Closed** Date of Reason: 10/26/21: There were improvements in collaboration between DLIR and DataHouse. The DataHouse Project Manager began working onsite at DLIR in October 2019 to improve DLIR and DataHouse project team cohesion. The DataHouse Project Manager continued to work onsite at DLIR through project completion.

**Supplemental Recommendation:**
- **2019.07.PM02.R3** Include DLIR in project activities and communications to increase DLIR and DataHouse project team cohesion.
The communication activities listed in the Project Management Plan (version 1.0) did not occur as planned as the weekly project status meetings did not begin until April 2019 and the first progress report was not submitted until July 2019. Despite the commencement of regular project communications, misunderstandings and information gaps have also been identified. The DLIR project team members had a partial understanding of the technical solutions delivered in Phase 1 (2019 Q1) and project risks and issues (see Finding 2019.07.PM05). Additionally, the development of the project communication plan did not take place until Phase 2 (2019 Q2) when the communication matrix was created. The DLIR and DataHouse project teams are working together to address this finding.

**Communication activities**

**Recommendations for Communication Activities**

1. **Weekly project status meetings**
   - Meet with the DataHouse and DLIR project teams to discuss progress and address any issues.
   - Keep minutes of the meetings for future reference.
   - Ensure that all stakeholders are represented.

2. **Regular communications**
   - Ensure that regular communications are conducted with all stakeholders.
   - Use a communication matrix to ensure that all stakeholders are kept informed.

3. **Informal communications**
   - Conduct informal communications as needed to address specific issues.
   - Ensure that these communications are documented.

4. **Project completion**
   - Ensure that all project activities are completed on time.
   - Conduct a final project review to evaluate the effectiveness of the communication plans.

**Communication Management**

**Finding 2019.07.PM06**

**Risk Management**

**Finding 2019.07.PM07**

**Recommendations for Risk Management**

1. **Risk management plan**
   - Develop a risk management plan that includes all project risks.
   - Ensure that the risk management plan is reviewed regularly.

2. **Risk assessment**
   - Conduct a risk assessment to identify potential risks.
   - Ensure that the risk assessment is reviewed regularly.

3. **Risk mitigation**
   - Develop a risk mitigation plan for each identified risk.
   - Ensure that the risk mitigation plan is reviewed regularly.

**Communication and Risk Management**

**Finding 2019.07.PM08**

**Recommendations for Communication and Risk Management**

1. **Communication and risk management**
   - Ensure that communication and risk management plans are integrated.
   - Ensure that the plans are reviewed regularly.

2. **Risk communication**
   - Develop a risk communication plan that includes all project risks.
   - Ensure that the risk communication plan is reviewed regularly.

3. **Risk monitoring**
   - Monitor the risks regularly to ensure that they are being managed effectively.
   - Ensure that the monitoring is reviewed regularly.
### Change Management

**Finding ID:** 2019.07.PM08  **Type:** Risk  **Severity:** Moderate  **Status:** Refer to prior IV&V Monthly Report for status updates before October 2021.

**FINDING:** 2019.07.PM08  **Type:** Risk  **Severity:** Moderate  **Status:** Refer to prior IV&V Monthly Report for status updates before October 2021.

**ASSESSMENT**

| CATEGORY | FINDING | ID | TYPE | SEVERITY | FINDING ID | SEVERITY | FINDING ANALYSIS | RECOMMENDATION ID | RECOMMENDATION | SUPPLEMENTAL RECOMMENDATION | DATE | CLOSURE REASON |
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**RECOMMENDATION:** Implement a structured OCM approach.

**SUPPLEMENTAL RECOMMENDATION:** Continue to monitor OCM strategies and processes throughout the project.

**DATE:** 02/24/22  **CLOSURE REASON:** DLIR held regular post go-live stand-up sessions to provide additional stakeholder support. OCM updates are regularly emailed to stakeholders on a weekly basis. However, resource engagement and ownership still remains low.

**RECOMMENDATION:** Conduct regular meetings to discuss project risks and issues.

**SUPPLEMENTAL RECOMMENDATION:** Include DataHouse and DLIR and, on occasion, the executive steering committee (refer to finding 2019.07.PG02). Perform a detailed review of new items, status of open items, risk/issue owners, and mitigation plans.

**DATE:** 01/25/22  **CLOSURE REASON:** Accuity decreased the severity rating from Level 1 (High) to Level 2 (Moderate). DLIR and DataHouse mitigated Phase 1 Content Management risks and issues but the time and effort that continues to be spent on Content Management is creating risks and issues for other phases. Risk mitigation plans for other phases of the project need to be developed and implemented.

**DATE:** 02/24/22  **CLOSURE REASON:** DLIR and DataHouse are working to address Phase 1 Content Management risks and issues but at the time there is little activity on the project. Risk mitigation plans for other phases of the project are needed to be developed and implemented.

**DATE:** 03/23/22  **CLOSURE REASON:** With the upcoming Phase 1 Case Management go-live, it is critical that risk mitigation plans are identified and implemented to ensure the project stays on track with the proposed timeline and can successfully deploy the new system. Accuity will continue to monitor the change readiness of project stakeholders.

**DATE:** 11/29/21  **CLOSURE REASON:** DLIR and DataHouse evaluated different risk mitigation strategies to address ongoing Phase 1 Content Management technical issues. DLIR and DataHouse are completing steps to mitigate risks and issues but additional improvements to risk management processes are needed to increase the speed of resolution.

**DATE:** 02/24/22  **CLOSURE REASON:** DLIR and DataHouse continue to develop some risk mitigation plans for the highest priority risks. With the aggressive timeline, it is critical for DLIR and DataHouse to continue to improve risk management processes as the risk and issues are properly identified and fully mitigated.

**DATE:** 11/29/21  **CLOSURE REASON:** DLIR and DataHouse are completing steps to mitigate risks and issues but additional improvements to risk management processes are needed to increase the speed of resolution.

**DATE:** 01/25/22  **CLOSURE REASON:** Accuity decreased the severity rating from Level 2 (Moderate) to Level 1 (High). DLIR and DataHouse are making some progress to complete risk and issue mitigation plans, however, the time spent on resolution is contributing to project delays. Close monitoring and quick execution of mitigation plans for all high priority risks and issues will help to accelerate schedule impacts of risks and issues.

**DATE:** 01/25/22  **CLOSURE REASON:** Accuity decreased the severity rating from Level 1 (High) to Level 2 (Moderate). DLIR and DataHouse are completing steps to mitigate risks and issues but additional improvements to risk management processes are needed to increase the speed of resolution.

**DATE:** 02/24/22  **CLOSURE REASON:** DLIR and DataHouse continue to develop some risk mitigation plans for the highest priority risks. With the aggressive timeline, it is critical for DLIR and DataHouse to continue to improve risk management processes as the risk and issues are properly identified and fully mitigated.

**DATE:** 01/25/22  **CLOSURE REASON:** Accuity decreased the severity rating from Level 2 (Moderate) to Level 1 (High). DLIR and DataHouse are making some progress to complete risk and issue mitigation plans, however, the time spent on resolution is contributing to project delays. Close monitoring and quick execution of mitigation plans for all high priority risks and issues will help to accelerate schedule impacts of risks and issues.

**DATE:** 01/25/22  **CLOSURE REASON:** Accuity decreased the severity rating from Level 1 (High) to Level 2 (Moderate). DLIR and DataHouse are completing steps to mitigate risks and issues but additional improvements to risk management processes are needed to increase the speed of resolution.

**DATE:** 02/24/22  **CLOSURE REASON:** DLIR and DataHouse are working to address Phase 1 Content Management risks and issues but at the time there is little activity on the project. Risk mitigation plans for other phases of the project are needed to be developed and implemented.

**DATE:** 03/23/22  **CLOSURE REASON:** With the upcoming Phase 1 Case Management go-live, it is critical that risk mitigation plans are identified and implemented to ensure the project stays on track with the proposed timeline and can successfully deploy the new system. Accuity will continue to monitor the change readiness of project stakeholders.
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Open Refer to prior IV&V Monthly Report for status updates before October 2021.

11/29/21: The ESC approved to re-baseline the Phase 1 Content Management timeline again, deferring the go-live from December 2021 to January 2022. Phase 1 Case Management, Phase 2, and Phase 3 activities are moving forward but there are some delays in underlying tasks.

Cost, Schedule and Management

Refer to prior IV&V Monthly Report for status updates before October 2021.

11/29/21: The proposed timeline is not based on an analysis of available resources but rather on stakeholders' needs for the new system. The resources identified are additional resources needed to support the project milestones and go-live dates in accordance with the Project Management Plan.

10/26/21: DLIR onboarded additional resources for UAT and is in the process of procuring additional resources. Resource engagement and ownership remains low. DLIR should continue pursuing resource management strategies.

03/23/22: Accuity decreased the severity rating from Level 1 (High) to Level 2 (Moderate) as DLIR is in the process of executing three contracts that will provide additional business analyst and data conversion resources. Three additional contracts are closed and in order to stay on track with the new schedule, the approved project schedule must be maintained.


10/26/21, 11/29/21, 12/29/21, 01/25/22, 02/24/22, and 03/23/22: Interface challenges were raised during Phase 2 design sessions but the interface solution is still unclear. Although the Project Management Plan specifies completion and Case Management design is in progress, the current interface solution is not yet defined. Open System Software, Hardware, and Integrations

2019.07.PM14 Issue High Moderate Open Resource management is included in the Project Management Plan and states that "resources will be provided based on the latest status of underlying tasks to ensure that the proposed schedule is still realistic and achievable.

2019.07.PM14.R4 Open Issue High Moderate

Refer to prior IV&V Monthly Report for status updates before October 2021.

12/29/21: DLIR is looking to onboard additional testing resources and acquire additional data conversion resources. DLIR should also continue to document the interface solution. Interface requirements were raised during Phase 2 design sessions but the interface solution remains unclear. However, even prior to this development, the interface solution should be clearly analyzed, documented, mapped to project requirements, and communicated to DLIR.


10/26/21, 11/29/21, 12/29/21, 01/25/22, 02/24/22, and 03/23/22: Interface requirements were raised during Phase 2 design sessions but the interface solution is still unclear. To continue evaluating the interface solution, the team needs to develop the interface design and acquire additional resources.


10/26/21, 11/29/21, 12/29/21, 01/25/22, 02/24/22, and 03/23/22: Interface requirements were raised during Phase 2 design sessions but the interface solution is still unclear. To continue evaluating the interface solution, the team needs to develop the interface design and acquire additional resources.
## Quality Management and Testing

The Quality Management Plan draft has yet to be approved by DLIR. The draft plan does not include quality metrics, quality standards, or quality objectives of the project and does not identify how quality control results will be documented or reported. Additionally, the Quality Assurance Lead identified in DataHouse's BAFO is not assigned to the project team at this time.

### Issue Details

- **Finding:** A lack of a quality management plan in place may impact the quality of project deliverables.

### Recommendation

- **Recommendation:** Ensure a quality management plan is developed and the plan is in accordance with the project plan.

### Date

- **Date:** 2019.07.05

### Risk Management

- **Risk:** High
- **Severity:** High

### Recommendation

- **Recommendation:** Ensure the quality management plan is developed.

### Date

- **Date:** 2019.07.05

## Configuration Management

A configuration management plan has yet to be finalized. The plan are intended to prepare a configuration management plan by October 11, 2019. Based on the current project plan, the eCMS Project was supposed to begin the Build stage of Phase 1. Although the current DHS Environment will likely delay the start of the Build stage, not having a configuration management plan in place may not be properly tracked, accepted and approved which may impact system performance or quality.

### Issue Details

- **Finding:** A lack of a configuration management plan in place may impact the performance and quality of the system if uncontrolled or unauthorized changes are permitted in production environments.

### Recommendation

- **Recommendation:** Ensure the configuration management plan is developed and the plan is in accordance with the project plan.

### Date

- **Date:** 2019.07.05

## Security

The Security Management Plan draft was submitted on June 3, 2019 but was not yet approved by DLIR. Based on the current project plan, the eCMS Project was supposed to begin the Build stage of Phase 1. Although the current DHS Environment will likely delay the start of the Build stage, not having a security management plan in place may not be properly tracked, accepted and approved which may impact system performance or privacy.

### Issue Details

- **Finding:** A lack of a security management plan in place may impact the security and privacy of the data.

### Recommendation

- **Recommendation:** Ensure the security management plan is developed and the plan is in accordance with the project plan.

### Date

- **Date:** 2019.07.05

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### Findings

**FINDING ID** | **FINDING ID** | **RECOMMENDATION ID** | **SEVERITY** | **FINDING ANALYSIS** | **RECOMMENDATION** | **SUPPLEMENTAL RECOMMENDATION** | **DATE** | **CLOSURE** | **REASON**
--- | --- | --- | --- | --- | --- | --- | --- | --- | ---
2019.09.PM01 |  |  | Moderate |  |  |  |  |  |  
Project Management Plan (2019.09.PM01). Document the change management processes that include Change Requests, impact assessments, and Change Log. The change in AWS (refer to finding 2019.07.PM01) was not documented in the Project Management Plan. Although the change was implemented, stakeholders were not notified that the change was made to the AWS environment. This is a high-risk change as there is no documented process to ensure that changes are appropriately communicated to impacted stakeholders.  

#### Recommendation

Implement a robust change management process that includes Change Requests, impact assessments, and a Change Log. The change to AWS ( referred to finding 2019.07.PM01) was not documented in the Project Management Plan. Although the change was implemented, stakeholders were not notified that the change was made to the AWS environment. This is a high-risk change as there is no documented process to ensure that changes are appropriately communicated to impacted stakeholders.  

- **ID**: Findings
- **ID**: Recommendations
- **ID**: Experimental Recommendation
- **ID**: Status
- **ID**: Finding Status
- **ID**: Finding Status Update
- **ID**: Closeout Date
- **ID**: Closeout Reason

### Finding Analysis

- **Finding Analysis**: The change to AWS ( referred to finding 2019.07.PM01) was not documented in the Project Management Plan. Although the change was implemented, stakeholders were not notified that the change was made to the AWS environment. This is a high-risk change as there is no documented process to ensure that changes are appropriately communicated to impacted stakeholders.

### Recommendations

- **Recommendation**: Implement a robust change management process that includes Change Requests, impact assessments, and a Change Log. The change to AWS ( referred to finding 2019.07.PM01) was not documented in the Project Management Plan. Although the change was implemented, stakeholders were not notified that the change was made to the AWS environment. This is a high-risk change as there is no documented process to ensure that changes are appropriately communicated to impacted stakeholders.

### Status Update

- **Status**: Closed
- **Status Update**: 04/27/21: DataHouse drafted the Test Plan Version 0.0, pending DLIR review and approval. 05/27/21: The DataHouse Test Plan is still under development and has not been reviewed or approved. 06/25/21: DLIR plans to combine all the pending Datacap related change requests into a comprehensive plan and document the related business requirements. 07/27/21: DataHouse drafted the new change request to document the related business requirements for the Phase 1, 2, and 3 changes. 08/25/21: DLIR and DataHouse agreed on a tentative plan and timeline of tasks to reach a decision regarding the Phase 1 Content Management solution by July 2021. 09/28/21: DLIR continues to review unresolved issues from UAT to perform their gap analysis. DLIR needs to work with DataHouse to swiftly complete the analysis and agree upon a plan to proceed. 

### Findings Analysis

- **Findings Analysis**: The DataHouse Test Plan is still under development and has not been reviewed or approved. 05/27/21: The DataHouse Test Plan is still under development and has not been reviewed or approved. 06/25/21: DLIR plans to combine all the pending Datacap related change requests into a comprehensive plan and document the related business requirements. 07/27/21: DataHouse drafted the new change request to document the related business requirements for the Phase 1, 2, and 3 changes. 08/25/21: DLIR and DataHouse agreed on a tentative plan and timeline of tasks to reach a decision regarding the Phase 1 Content Management solution by July 2021. 09/28/21: DLIR continues to review unresolved issues from UAT to perform their gap analysis. DLIR needs to work with DataHouse to swiftly complete the analysis and agree upon a plan to proceed. 

### Recommendations

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The COVID-19 pandemic is impacting project execution although the extent of impacts on project costs, schedule, and resources are currently indeterminable.

The following is a summary of the related events and tasks in the IV&V Project Management Improvement Area (2019.07.PM.11) following directions for non-exempt state workers to stay home, reduce social gatherings, and engage in telework if possible. However, the new DLIR project resources were not yet available to support the office to be in the same state as the other project team members. Thus, telework was not yet possible for the DLIR project team members.

The Office of Enterprise Technology Services (ETS) and DLIR Electronic Data Processing Systems Office (EDPSO) have established a practice of daily coordination meetings to assess the situation and individually log all of the specific impacts on the project as they arise, including direct and indirect impacts to the project. The level of coordination amongst project members has been reduced but at a time when it is more important than ever for project members to interact and communicate effectively. The Office of Enterprise Technology Services (ETS) and DLIR Electronic Data Processing Systems Office (EDPSO) have established a practice of daily coordination meetings to assess the situation and individually log all of the specific impacts on the project as they arise, including direct and indirect impacts to the project. The level of coordination amongst project members has been reduced but at a time when it is more important than ever for project members to interact and communicate effectively.

The following are some of the project management area details that are impacting the project.

- Phase I of the project was completed and there is a standardized schedule for completion. Some of the lessons learned from Phase I include:
  - Inadequate planning and lack of a detailed project schedule for Phase I may impact the execution of Phase II activities and result in delays.
  - The Office of Enterprise Technology Services (ETS) and DLIR Electronic Data Processing Systems Office (EDPSO) have established a practice of daily coordination meetings to assess the situation and individually log all of the specific impacts on the project as they arise, including direct and indirect impacts to the project. The level of coordination amongst project members has been reduced but at a time when it is more important than ever for project members to interact and communicate effectively.
  - The following is a summary of the related events and tasks in the IV&V Project Management Improvement Area (2019.07.PM.11) following directions for non-exempt state workers to stay home, reduce social gatherings, and engage in telework if possible. However, the new DLIR project resources were not yet available to support the office to be in the same state as the other project team members. Thus, telework was not yet possible for the DLIR project team members.

- The following are some of the project management area details that are impacting the project.

  - Inadequate planning and lack of a detailed project schedule for Phase I may impact the execution of Phase II activities and result in delays.
  - The Office of Enterprise Technology Services (ETS) and DLIR Electronic Data Processing Systems Office (EDPSO) have established a practice of daily coordination meetings to assess the situation and individually log all of the specific impacts on the project as they arise, including direct and indirect impacts to the project. The level of coordination amongst project members has been reduced but at a time when it is more important than ever for project members to interact and communicate effectively.

The following are some of the project management area details that are impacting the project.

- Inadequate planning and lack of a detailed project schedule for Phase I may impact the execution of Phase II activities and result in delays.
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<td>Development and Management</td>
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<td>N/A</td>
<td>for positive findings. N/A for positive findings. Closed N/A</td>
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<td>Organization and Management</td>
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<td>The DataHouse team's swift and decisive response to project risks has led to further improvements in project performance and efficiency.</td>
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<td>Effectiveness</td>
<td>2019.07.PG02 Moderate</td>
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<td>N/A</td>
<td>The unclear DataHouse contract terms may limit objective evaluation of contractor performance and contract fulfillment.</td>
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<tr>
<td>Effectiveness</td>
<td>2019.07.PG03 Moderate</td>
<td>N/A</td>
<td>N/A</td>
<td>The lack of guidelines, checklists, and communication protocols may limit the effectiveness of project governance.</td>
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<tr>
<td>Effectiveness</td>
<td>2019.07.PG04 Low</td>
<td>N/A</td>
<td>N/A</td>
<td>The DataHouse proposal and Project Management Plan to approve all project change requests, while sometimes effective, can also lead to delays if not managed properly.</td>
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</table>

Overall, the DataHouse team works very collaboratively with DLIR and demonstrates commitment to continuous improvement, resulting in smoother project execution and increased transparency.
The DLIR Project Manager is a dedicated project lead who works collaboratively with internal stakeholders.

**Project Organization and Management**

**FINDING**

The eCMS Project's primary modernization objective is to move to a paperless and automated business process. The new system is being designed to allow for electronic filing, routing, and approval processes, with the ultimate goal of streamlining the current business process and reducing the time required for claims processing.

**RECOMMENDATION**

1. **Identify and track BPR opportunities**
   - Develop a business process improvement matrix to document business process improvements.

2. **Communicate the approach for BPR opportunities**
   - Include BPR opportunities in project communications and training.

3. **Implement plan to track BPR opportunities**
   - Use a tool such as a business process improvement log to track BPR opportunities.

4. **Communicate the approach for BPR opportunities**
   - Include BPR opportunities in project communications and training.

**EXPERIMENTAL RECOMMENDATION**

- Consider industry best practices for Agile methodologies such as retrospectives, daily standups, burndown charts, and frequent user demonstrations and feedback.
- Establish the backlog with a clear focus on user stories that support the eCMS project goals.
- Use a tool such as a business process improvement log to document business process improvements.

**DEADLINE**

- 12/20/19: BPR opportunities continue to be discussed during sprint sessions; however, identified opportunities are not formally tracked.
- 2019.07.PG05.R2 Communicate the approach for BPR opportunities in all team communications and training materials.
- 2019.07.PG05.R3 Communicate the approach for BPR opportunities in all team communications and training materials.
- 2019.07.PG05.R4 Communicate the approach for BPR opportunities in all team communications and training materials.

**IV&V**

- The IV&V recommendations made at 2019.07.PG05.R1, 2019.07.PG05.R2, and 2019.07.PG05.R3 regarding clear and measurable business process improvement objectives are in the process of being implemented.

- The IV&V recommendations made at 2019.07.PG05.R1, 2019.07.PG05.R2, and 2019.07.PG05.R3 regarding clear and measurable business process improvement objectives are in the process of being implemented.

**RFP**

- The RFPs were prepared with a clear understanding of the stakeholder needs and requirements.

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**ISO**

- The ISO 9001:2015 standards are being followed in the development of the eCMS system.

- The ISO 9001:2015 standards are being followed in the development of the eCMS system.

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**FINDING ANALYSIS**

- The eCMS Project's primary modernization objective is to move to a paperless and automated business process.

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**RECOMMENDATION SUPPLEMENTAL**

- Include BPR opportunities in project communications and training.

- Include BPR opportunities in project communications and training.

- Include BPR opportunities in project communications and training.

**SUPPLEMENTAL RECOMMENDATION**

- Consider industry best practices for Agile methodologies such as retrospectives, daily standups, burndown charts, and frequent user demonstrations and feedback.

- Establish the backlog with a clear focus on user stories that support the eCMS project goals.

- Use a tool such as a business process improvement log to document business process improvements.
There are a number of items in the DataHouse BAFO that are no longer feasible based on the inability to leverage the existing DHS FileNet environment. Under the original solution, DHS would... implementation.

Consider the following website which lists 20 competitive alternatives: www.g2.com/products/ibm-filenet-content-manager/competitors/alternatives. Additional research could... scalability and security considerations.

The proposed AWS solution was compared to another cloud solution, Microsoft Azure, in respects to project cost, schedule, and performance. DataHouse decided that AWS is the better solution for the proposed hosting infrastructure solution. Additional research could result in more aggressive cost savings going forward.

The requirement for a comprehensive technical analysis of the alternative solution was approved by DLIR. As a comprehensive analysis was not prepared and there is still a need for the additional information... the requirements will continue to be the basis for the next iteration of the data conversion plan.

As data conversion is the process of converting data from one source to another, data conversion plans may impact the data migration design process and require additional effort to correct. The Content Management Design Document was prepared by DataHouse to leverage the existing DHS FileNet hosting infrastructure is no longer a feasible solution.

Although this issue relates to the proposed hosting infrastructure solution... the requirements documentation to include all requirements from the DataHouse contract.

To address the deficiency, DataHouse has drafted an alternative solution for the content management design documents.

As data conversion is the process of converting data from one source to another, data conversion plans may impact the data migration design process and require additional effort to correct. As a comprehensive analysis was not prepared and there is still a need for the additional information... the requirements will continue to be the basis for the next iteration of the data conversion plan.

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## Appendix E: Prior IV&V Reports

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Appendix F: Comment Log on Draft Report
## Appendix F: Comment Log on Draft Report

**DLIR DCD eCMS Project: IV&V Document Comment Log**

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