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June 5, 2023

The Honorable Ronald D. Kouchi  
President of the Senate  
and Members of the Senate  
Thirty-Second State Legislature  
State Capitol, Room 409  
Honolulu, Hawai'i 96813

The Honorable Scott K. Saiki  
Speaker and Members of the  
House of Representatives  
Thirty-Second State Legislature  
State Capitol, Room 431  
Honolulu, Hawai'i 96813

Aloha Senate 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 report the Office of Enterprise Technology Services received for the State of Hawai'i, Department of Commerce and Consumer Affairs, Business Registration Modernization Project.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Tom M", which is the signature of Douglas Murdock.

On behalf of  
Douglas Murdock  
Chief Information Officer  
State of Hawai'i

Attachment



STATE OF HAWAII  
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS (DCCA)

# Business Registration Modernization (BRM) Project

MONTHLY IV&V REVIEW REPORT

April 30, 2023 | Version 1.0





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## Document History

DATE	DESCRIPTION	AUTHOR	VERSION
05/10/23	Monthly IV&V Review Report Draft created	Julia Okinaka	0.0
05/30/23	Appendix B was updated to replace industry standards that have been superseded by more current versions.  Appendix C was updated to reflect the reporting month that changes were made in severity ratings to existing observations.  Report draft was updated to make correction on page 6 which is also reflected in the Comment Log. Additional comments and responses were included in Appendix D which did not result in changes to the report.	Julia Okinaka	1.0



## BACKGROUND

The State of Hawaii (State), Department of Commerce and Consumer Affairs (DCCA) contracted Century Computers, Inc. (Pacxa) on July 1, 2022 to provide services for the Business Registration Modernization (BRM) Project to redesign the Business Registration (BREG) Division's business registration processes and modernize its systems. DCCA contracted Aalta LLC (Aalta) to provide project management services for DCCA and also contracted Accuity LLP (Accuity) to provide Independent Verification and Validation (IV&V) services for the BRM Project.

Our initial assessment of project health was provided in the first Monthly IV&V Review Report as of August 31, 2022. Monthly IV&V Review Reports will be issued through December 2023 and will build upon the initial report to continually update and evaluate project progress and performance.

Our IV&V Assessment Areas include People, Process, and Technology. Each month we will select specific IV&V Assessment Areas to perform more focused IV&V activities on a rotational basis. The focus of our IV&V activities for this report included the completion of a two-month assessment of Process and the beginning of a two-month assessment of People. IV&V has areas of limited visibility or access to all project activities that may prevent a complete identification of project risks.

The IV&V Dashboard and IV&V Summary provide a quick visual and narrative snapshot of both the project status and project assessment as of April 30, 2023. Ratings are provided monthly for each IV&V Assessment Area (refer to Appendix A: IV&V Criticality and Severity Ratings). The overall rating is assigned based on the criticality ratings of the IV&V Assessment Categories and the severity ratings of the underlying observations.

### LEADERSHIP & CHANGE

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*"Wherever there is  
change, wherever  
there is  
uncertainty, there  
is OPPORTUNITY."*

*- Mark Cuban*

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# PROJECT ASSESSMENT

APRIL 2023

## SUMMARY RATINGS

### OVERALL RATING



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

### PEOPLE



### PROCESS



### TECHNOLOGY



### CRITICALITY RATINGS



HIGH



MEDIUM

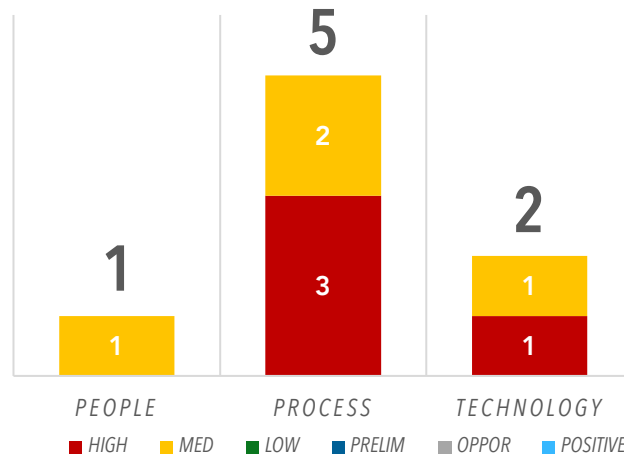


LOW



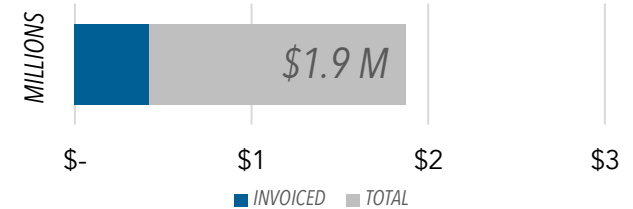
N/A

## IV&V OBSERVATIONS



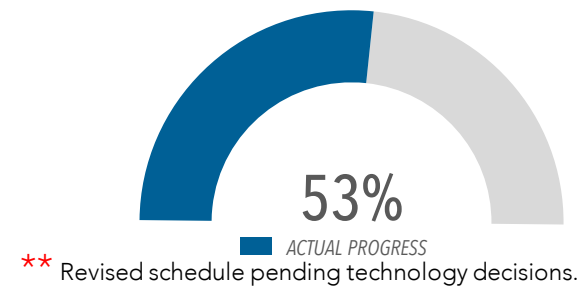
Category	Count	Status
NEW OBSERVATIONS	0	NEW
OPEN OBSERVATIONS	8	OPEN
CLOSED OBSERVATIONS	0	CLOSED
OPEN RECOMMENDATIONS	17	OPEN

## PROJECT BUDGET\*



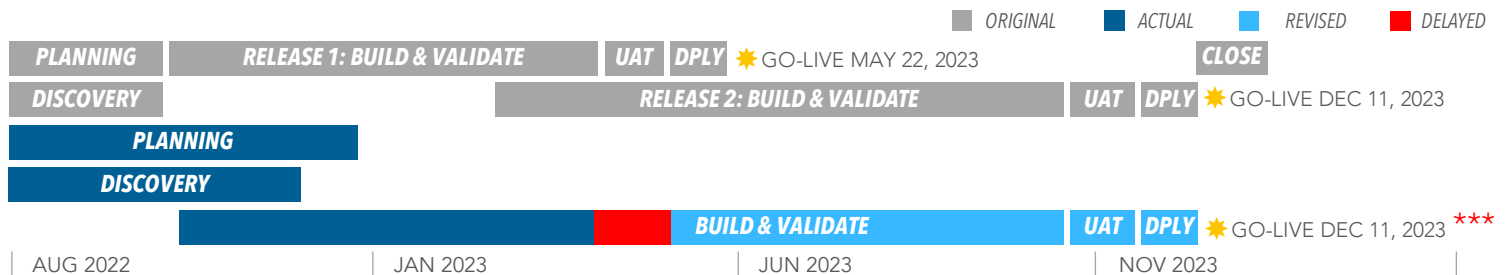
\* Only includes contracts. IV&V unable to validate total budget.

## PROJECT PROGRESS\*\*









## KEY PROGRESS & RISKS

- DCCA and Pacxa continue to evaluate options to change the overall solution architecture and design in order to meet a key system requirement. A decision is expected in May. It is vital to document the decision and follow the formal change control process.
- Architecture and design changes will delay the December 2023 Go-Live and increase near-term project costs.
- More rigor on foundational project management practices is needed to get the project back on track and prevent further delays and costs.
- Despite a possible shift in direction, the project is moving ahead with the planned Client Interim Review testing.



\*\*\* Revised schedule and Go-Live pending technology decisions.

FEB	MAR	APR	IV&V ASSESSMENT AREA	IV&V SUMMARY
			<b>Overall</b>	<p>DCCA and Pacxa are evaluating different options for the overall solution architecture and design, including how best to meet the FedRAMP cloud requirement (2023.03.001). The project is at a critical juncture and should follow the formal change control process established in the Change Management Plan.</p> <p>Project Schedule: The change in architecture and design will push back the December 2023 Go-Live date. The project schedule will be re-baselined upon making key technical decisions (2022.09.001).</p> <p>Project Costs: The overall technology solution direction and financial impacts are under evaluation. Near-term project costs will likely increase and be determined based on the option selected.</p> <p>Quality: Client Interim Review will commence with some medium severity defects still open, which could impact the quality of testing and the customer experience. Testing metrics will be reported and monitored to assess the quality of development, testing, and defect management.</p> <p>Project Success: Project success metrics are under development and expected in May (2022.08.006). With a change in technology direction, a clear agreement of project benefits and how to achieve them will help the team to work towards a common goal.</p>
			<b>People</b> <i>Team, Stakeholders, &amp; Culture</i>	<ul style="list-style-type: none"> <li>• The impact of the pending technical decisions on resources should be carefully assessed, including the need for a revised resource management plan and any additional organizational change management (OCM) efforts (2022.08.002 and 2022.09.001).</li> <li>• As the project direction shifts and multiple workstreams reassess their tasks and responsibilities, it is critical that the team promote an open, transparent culture of having candid dialogue, discussing risks, developing risk mitigation plans, and holding each other accountable (2023.02.001).</li> <li>• The Client Interim Review and JAD 13 and 14 sessions are going to occur simultaneously in May 2023. DCCA needs to proactively plan and schedule resources to reduce challenges with performing their jobs and multiple project tasks concurrently (2022.08.002).</li> <li>• Project leadership is actively involved in evaluating the technology options and associated costs. The Executive Steering Committee (ESC) needs to play a strong role in ensuring a thorough evaluation is conducted and the pros and cons of each option are clearly documented.</li> <li>• The organizational change management (OCM) team distributed its fourth project newsletter.</li> <li>• DCCA is continuing to recruit and fill their open vacancies.</li> </ul>



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### Process

*Approach & Execution*

- More rigor on foundational project management practices is needed to get the project back on track and prevent further delays and costs (2023.02.002 and 2022.09.001).
- The analysis and decision should be clearly documented following the project's Change Management Plan to fully assess, document, and approve all known impacts of the change. DCCA's PM proposed the use of the Decision Analysis and Resolution (DAR) Process to document and analyze the pending technology options. It is unclear whose role it is to facilitate and lead DCCA through the DAR process.
- Aalta has made progress on some pending deliverables, and they are working with the DCCA Project Sponsor to clarify expectations. As DCCA's PM, it will be important for Aalta to actively oversee project changes and ensure proper replanning, monitoring, controlling, and execution of project activities (2023.02.002).
- As the FedRAMP cloud requirement gap should have been caught earlier, the importance of timely and active tracing of requirements is an important lesson learned for this project. The process to trace, test, and approve requirements is still pending (2023.01.001).
- The project managers should conduct a lessons learned meeting to ensure the project team effectively adjusts to the new path forward and avoids past project challenges (2023.03.001 and 2023.02.002).
- Quantitative success metrics are being developed and the revised delivery date is May (2022.08.006).
- Project deliverables are on hold or will need to be updated based on the pending technology decisions.

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R

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### Technology

*System, Data, & Security*

- Technology options are still being assessed which could impact the overall solution architecture, design, and applications. While some technology activities continue to move forward, an analysis is needed to determine the amount of rework and additional development work required (2023.03.001).
- With the revised technology approach, technical deliverables, diagrams, and documentation should be provided earlier to ensure transparency and mutual understanding of the overall architecture (2023.03.001).
- The project successfully completed Joint Application Design (JAD) sessions 11 and 12 timely. Sprint 4 concluded with 58 out of the 62 (94%) targeted user stories completed.
- The development of the DocuSign Integration with the Kofax scanner was completed, and the testing of the integration is in progress.
- Progress continues to be made for the various data conversion phases. Some phases and activities are dependent on storage and other technical decisions (2023.01.002).\*

\*Accuity is not reporting individual technology risks as formal IV&V observations as they are already tracked by the project team. The rating for this IV&V Assessment Area reflects the cumulative risks.



# 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. 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, the overall impact of the related observations 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 observations. No arrow indicates there was neither improving nor declining progress from the prior report.

#### TERMS

##### RISK

An event that has not happened yet.

##### ISSUE

An event that is already occurring or has already happened.



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

### POSITIVE

Celebrates high performance or project successes.

### PRELIMINARY CONCERN

Potential risk requiring further analysis.

## 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).

Observations that are positive, preliminary concerns, or opportunities are not assigned a severity rating.



**SEVERITY 1:** High/Critical level



**SEVERITY 2:** Moderate level



**SEVERITY 3:** Low level

## Appendix B: Industry Standards and Best Practices

STANDARD	DESCRIPTION
ADA	Americans with Disabilities Act
ADKAR®	Prosci ADKAR: Awareness, Desire, Knowledge, Ability, and Reinforcement
BABOK® v3	Business Analyst Body of Knowledge
DAMA-DMBOK® v2	DAMA International's Guide to the Data Management Body of Knowledge
PMBOK® v7	Project Management Institute (PMI) Project Management Body of Knowledge
SPM	PMI The Standard for Project Management
PROSCI ADKAR®	Leading organization providing research, methodology, and tools on change management practices
SWEBOK v3	Guide to the Software Engineering Body of Knowledge
IEEE 828-2012	Institute of Electrical and Electronics Engineers (IEEE) Standard for Configuration Management in Systems and Software Engineering
IEEE 1062-2015	IEEE Recommended Practice for Software Acquisition
IEEE 1012-2016	IEEE Standard for System, Software, and Hardware Verification and Validation
IEEE 730-2014	IEEE Standard for Software Quality Assurance Processes
ISO 9001:2015	International Organization for Standardization (ISO) Quality Management Systems – Requirements
ISO/IEC 25010:2011	ISO/International Electrotechnical Commission (IEC) Systems and Software Engineering – Systems and Software Quality Requirements and Evaluation (SQuARE) – System and Software Quality Models
ISO/IEC 16085:2021	ISO/IEC Systems and Software Engineering – Life Cycle Processes – Risk Management
IEEE 16326-2019	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Processes – Project Management
IEEE 29148-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Processes – Requirements Engineering

STANDARD	DESCRIPTION
IEEE 15288-2023	ISO/IEC/IEEE International Standard – Systems and Software Engineering – System Life Cycle Processes
IEEE 12207-2017	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Software Life Cycle Processes
IEEE 24748-1-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Management – Part 1: Guidelines for Life Cycle Management
IEEE 24748-2-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Management – Part 2: Guidelines for the Application of ISO/IEC/IEEE 15288 (System Life Cycle Processes)
IEEE 24748-3-2020	IEEE Guide: Adoption of ISO/IEC TR 24748-3:2011, Systems and Software Engineering – Life Cycle Management – Part 3: Guide to the Application of ISO/IEC 12207 (Software Life Cycle Processes)
IEEE 14764-2021	ISO/IEC/IEEE International Standard for Software Engineering – Software Life Cycle Processes – Maintenance
IEEE 15289-2019	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Content of Life Cycle Information Items (Documentation)
IEEE 24765-2017	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Vocabulary
IEEE 26511-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Requirements for Managers of Information for Users of Systems, Software, and Services
IEEE 23026-2015	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Engineering and Management of Websites for Systems, Software, and Services Information
IEEE 29119-1-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 1: Concepts and Definitions
IEEE 29119-2-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 2: Test Processes
IEEE 29119-3-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 3: Test Documentation
IEEE 29119-4-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 4: Test Techniques
IEEE 1484.13.1-2012	IEEE Standard for Learning Technology – Conceptual Model for Resource Aggregation for Learning, Education, and Training
ISO/IEC TR 20000-11:2021	ISO/IEC Information Technology – Service Management – Part 11: Guidance on the Relationship Between ISO/IEC 20000-1:2011 and Service Management Frameworks: ITIL®
ISO/IEC 27002:2022	Information Technology – Security Techniques – Code of Practice for Information Security Controls

STANDARD	DESCRIPTION
FIPS 199	Federal Information Processing Standard (FIPS) Publication 199, Standards for Security Categorization of Federal Information and Information Systems
FIPS 200	FIPS Publication 200, Minimum Security Requirements for Federal Information and Information Systems
NIST 800-53 Rev 5	National Institute of Standards and Technology (NIST) Security and Privacy Controls for Federal Information Systems and Organizations
NIST Cybersecurity Framework v1.1	NIST Framework for Improving Critical Infrastructure Cybersecurity
LSS	Lean Six Sigma



## *Appendix C: Prior Observations Log*

Appendix C: Observations and Recommendations Log

Assessment Area	Observation ID	Type	Original Severity	Current Severity	Observation	Analysis	Recommendations	Status	Status Update	Closed Date	Closure Reason
Technology	2023.03.001	Risk	High	High	Uncertainty regarding the solution capabilities, architecture, and design could lead to corrective actions and impact project planning, costs, and schedule.	<p>A lack of clarity around the platform and architecture decisions made at the beginning of the project, and the impacts of the outstanding technical questions is resulting in lack of confidence that the stakeholders have a full understanding of the systems, requirements, and integrations.</p> <ul style="list-style-type: none"><li>• A requirement of the solution was that the solution be hosted by a “FedRAMP Certified” Cloud Service Provider. Pacxa is in discussions with Clariti as they are not confident that the right licenses were procured.</li><li>• DocuSign does not support all the required, critical features required by DCCA and will require implementation of other tools or other workaround solutions.</li><li>• Pacxa identified the need for more data storage in Salesforce to continue with their migration activities.</li><li>• There is no documentation available for the validation and logic embedded within DCCA's current Kofax scanners, so Pacxa must reverse engineer and confirm user requirements.</li><li>• The Architecture and Technical Design deliverable is not scheduled to be delivered until November 2023, which is only one month prior to the planned Go-live date of December 2023. In light of recent concerns, DCCA has requested that this deliverable be provided earlier; however, a completion date is still pending.</li></ul> <p>It is crucial for DCCA and Pacxa to work closely together on an overall solution. The project schedule will need to reflect the path forward and any corrective actions and rework which may impact project resources, costs, and schedule.</p>	<p>2023.03.001.R1 – Strategic choices regarding system architecture and design should be revisited.</p> <ul style="list-style-type: none"><li>•Perform a thorough review and tracking of technical requirements to identify all major gaps. Assign risk/criticality ratings for each identified gap.</li><li>•Evaluate how each option addresses all major gaps.</li><li>•Consider impacts to current phase as well as total solution/project; short-term costs and total cost of ownership (TCO); and impacts to the implementation plan and users.</li></ul> <p>2023.03.001.R2 – Review and agree on solution architecture and design.</p> <ul style="list-style-type: none"><li>•Conduct a thorough review of the Architecture and Technical Design to ensure mutual understanding.</li></ul> <p><b>NEW</b> 2023.03.001.R3 – Formally document the technology decisions and follow the project's established change management process.</p> <ul style="list-style-type: none"><li>•Formally document the decision. Consider using Aalta's proposed Decision Analysis and Resolution (DAR) Process to analyze and document the pending technology options.</li><li>•Follow the project's approved Change Management Plan to fully assess, document, and approve the change.</li><li>•Document plans to address and mitigate the known impacts, gaps, and risks with the selected option</li></ul> <p><b>NEW</b> 2023.03.001.R4 - Conduct a lessons learned meeting to identify areas for improvement and avoid past project challenges.</p>	Open	<p>04/30/23: DCCA and Pacxa are reviewing different options for the overall solution architecture and design, including options to meet the FedRAMP cloud requirement. The decision is expected in May. We added two additional recommendations, 2023.03.001.R3 and 2023.03.001.R4, to document the technology decisions, follow the project's established change management process, and conduct a lessons learned meeting.</p> <p>Accuity will continue to update and monitor the decision-making, change management, and lessons learned process.</p>		
Process	2023.02.001	Risk	Moderate	Moderate	Current risk management processes aren't communicating risks or executing risk mitigating tasks early enough which may impact project scope, schedule, and costs.	<p>The lack of adequate communication around risks and potential changes, could result in unanticipated consequences. IV&amp;V has observed many instances where delays and risks are not proactively communicated. For example, although risks are discussed at weekly status meetings; the risk regarding adequate data storage was not communicated for three weeks after initial discovery. Also, the project was not made aware that 25 out of 111 (23%) user stories tagged for Sprint 2 were at risk of not being completed until after the Sprint was completed.</p> <p>Although IV&amp;V has observed some initial improvement in recent meetings and the earlier communication of technology uncertainties and exploration of alternatives, it is imperative to foster an open, transparent culture where the discussion of risks and issues is expected and encouraged.</p>	<p>2023.02.001.R1 – Foster an open, transparent culture where it is safe and comfortable to discuss risks.</p> <ul style="list-style-type: none"><li>• Foster a culture of having candid dialogue, discussing potential risks, asking difficult questions, and holding each other accountable.</li></ul> <p>2023.02.001.R2 – In instances where changes are unavoidable, the project team should initiate change management processes early. Risks, costs, schedule, and quality impacts should be assessed and clearly communicated.</p>	Open	<p>03/31/23: Strong risk management is required as the project continues to be confronted by technology challenges, unanticipated changes, and delays. Additional focus on identifying root causes of risks and challenges, and executing mitigation plans timely will help reduce ongoing concerns.</p> <p>04/30/23: Accuity observed more active discussion and logging of project risks; however, improvement still needs to be made in the development of risk mitigation strategies, change management processes, communication of risks by all stakeholders, and accountability. As the project direction shifts and multiple workstreams reassess their tasks and responsibilities, it is paramount that risks continue to be discussed openly and timely.</p> <p>Accuity will continue to monitor the risk management process.</p>		
Process	2023.02.002	Risk	N/A	High	Untimely and insufficient completion of project management responsibilities may impact effective project execution.	<p>Aalta was contracted to provide various project, oversight, risk, and quality management services to DCCA. Aalta's deliverables were defined; however, many key deliverables are still pending including the criticality and risk assessment (CARA) report, interim User Acceptance Testing (UAT) Plan, project success metrics, and performance work statement (PWS) dashboard. Although some preliminary drafts and demos have been provided, additional information is needed on how to implement those plans and processes to successfully execute upcoming project activities.</p> <p>Possible root causes or contributing factors are an aggressive project pace, the turnover and adequacy of project management resources, and project complexity. The Aalta Project Manager is collaborative and a team player; however, may not have adequate time to perform all of the required project management tasks. DCCA and Aalta will need to work together to establish appropriate project management processes and clarify the priority of project management deliverables and activities.</p>	<p>Recommendation: 2023.02.002.R1 – Clarify roles and expectations of DCCA PM</p> <ul style="list-style-type: none"><li>•Clarify and prioritize purpose and expectations of project manager contracted services in light of project risks and lessons learned</li></ul> <p>2023.02.002.R2 – Develop a project schedule to manage Aalta tasks and deliverables</p> <ul style="list-style-type: none"><li>•Provide the appropriate detail of tasks, durations, due dates, milestones, and deliverables.</li><li>•Consider either developing a separate schedule or incorporating into Pacxa's project schedule.</li></ul>	Open	<p>03/31/23: This was originally reported in the February 2023 IV&amp;V Monthly Report as a preliminary concern but is upgraded to a risk in the March 2023 report. IV&amp;V has observed improvement in some project management activities and support provided by other Aalta team members. Aalta's deliverables have been defined; however, many key deliverables according to their Project Management Plan v1.2, contract, and proposal are still pending. Clarification of the DCCA PM's responsibilities and expectations, as well as a project schedule for PM activities, are needed.</p> <p>04/30/23: Accuity increased the severity rating from Level 2 (Moderate) to Level 1 (High). More rigor on foundational project management practices is needed to get the project back on track and prevent further delays and costs. Aalta has made progress on some pending deliverables, and they are working with the DCCA Project Sponsor to clarify expectations. As DCCA's PM, it will be important for Aalta to actively oversee project changes and ensure proper replanning, monitoring, controlling, and execution of project activities.</p> <p>Accuity will continue to monitor the execution of project management responsibilities.</p>		



ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2023.01.001	Risk	N/A	High	<p>The DCCA PM's delay in developing processes to trace, test, and approve requirements may impact the ability to ensure the overall BRM solution fulfills all requirements and expectations.</p>	<p>This was originally reported in the January 2023 IV&amp;V Monthly Report as a preliminary concern but is upgraded to a risk in this report. Since our initial preliminary observation, Pacxa provided access to the Azure DevOps (ADO) tool used for requirements traceability and scheduled training on the tool in early March 2023. The tool includes acceptance criteria, test cases, defect tracking, and reporting and dashboard capabilities.</p> <p>Per contract requirements, the Aalta PM is responsible for working with DCCA to develop objective and measurable standards that are traceable to the objectives of the system integrator (SI) contract and reconcile the gap on an ongoing basis. Aalta is developing a requirements dashboard using Smartsheets for tracking Pacxa's contract requirements. Although the project kicked-off Development Sprint 3, the Smartsheets tool is still incomplete, has not been put into use, and DCCA's processes to trace, test, and approve requirements are still not defined.</p> <p>Furthermore, as there are currently four separate tools with various project requirements, clarifying who is cross-referencing the requirements, contract deliverables, and project objectives is paramount to ensuring there is no duplication of efforts or gaps in the process.</p> <p>1) Smartsheets Tool: Aalta loaded Pacxa's contract requirements into Smartsheets. It has contract requirements, but does not include all functional/technical requirements or project deliverables.</p> <p>2) ADO Tool: Pacxa uses this tool to track their development work including user stories, bugs, features, test cases, and defects.</p> <p>3) Requirements Traceability Matrix (RTM): The RTM maps the projects functional and technical requirements to each epic and feature in the ADO Tool. The one-to-many mapping of requirements to user stories may increase the complexity of testing, approving, and validating requirements.</p> <p>4) Microsoft Project Schedule Tool: Pacxa's document deliverables are being traced in both the Smartsheets tool and Microsoft Project Schedule. Aalta's deliverables are not being tracked in any tool.</p> <p>The project has completed 8 of 19 planned JAD sessions. After each JAD session, Pacxa provides design documents with process flow diagrams, use cases, use case diagrams, and other information for the SI to build and test the solution. It is unclear if these documents are being thoroughly reviewed by DCCA and cross-checked against the contractual documents and the RTM to ensure requirements are being met. Furthermore, the demonstrations for Sprint 1 and 2 were completed but there is currently no process to review the user stories in connection with each Sprint for satisfaction against the requirements and acceptance criteria.</p>	<p>2023.01.001.R1 – DCCA PM to formalize and communicate a clear process to review and accept project requirements and deliverables.</p> <ul style="list-style-type: none"><li>•Define roles and responsibilities of project team members to eliminate duplication of efforts or process gaps.</li><li>•Streamline the use of tools and clearly define the steps to ensure requirements satisfaction.</li><li>•Communicate DCCA PM and SME roles and responsibilities for reviewing the fulfillment of requirements after JAD Sessions and Sprint Demonstrations.</li></ul> <p>2023.01.001.R2 – Develop clear traceability and understanding of all contract requirements.</p> <ul style="list-style-type: none"><li>•The DCCA and Aalta PMs should reference and track all contractual requirements and vendor responsibilities contained within the Request for Proposal, RTM, proposals, best and final offer documents, and contracts.</li></ul>	Open	<p>02/28/23: This was originally reported in the January 2023 IV&amp;V Monthly Report as a preliminary concern but is upgraded to a risk in the February 2023 report.</p> <p>03/31/23: Aalta provided a high-level walkthrough of the Smartsheets tool showing how Pacxa's contract requirements will be tracked. The Smartsheets tool is still being refined and access is still pending. Furthermore, a process for traceability and validation against the requirements traceability matrix (RTM) is also being developed. For deliverable tracking, Deliverable Review Checklists are still pending for Pacxa deliverables.</p> <p>04/30/23: Accuity increased the severity rating from Level 2 (Moderate) to Level 1 (High). As the FedRAMP cloud requirement gap should have been caught earlier, the importance of timely and active tracing of requirements is an important lesson learned for this project. The process to trace, test, and approve requirements is still pending.</p> <p>Accuity will continue to update and monitor the requirements management process.</p>		

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Technology	2023.01.002	Risk	Moderate	Moderate	Multiple outstanding data conversion items are preventing the timely execution of data activities which may have impacts on the project schedule.	<p>There are multiple phases and iterations of Data and Document Conversion happening concurrently. Although good progress has been made in some areas, there are a number of outstanding items that were planned to begin already, that are delayed such as:</p> <ul style="list-style-type: none"><li>•HBE Portal to Clariti: The project planned on receiving the database extract at the end of December 2022; however, due to reliance on a third-party vendor, the data is expected to be delivered in February 2023. (Risk ID #9.00; Action Item #117)</li><li>•RDPMS to DocuSign CLM Instance: The project planned on starting the migration of documents in January 2023. There is a currently a limitation with the bulk import process, and alternative bulk upload approaches need to be investigated with DocuSign, if available. (Action Item #114)</li><li>•Migration of Documents from Old DocuSign Instance to New DocuSign CLM Instance: The project must find a mechanism to migrate over the documents to the new instance; however, the responsibility for the migration is still unclear. Furthermore, the project needs to create procedures to have the documents reorganized so that it is consumable by the new system. Additional meetings are being scheduled with DocuSign to resolve this matter. (Risk ID #2.00; Action Item #115 and #116)</li></ul> <p>Status and steps to address the open data conversion issues are tracked in the RAID Log as open risks and actions.</p>	<p>2023.01.002.R1 – Enhance management and execution of the action items to address all the outstanding data conversion issues.</p> <ul style="list-style-type: none"><li>•Risks, costs, and schedule impacts of delays and decisions must be clearly communicated and understood.</li><li>•The action items should identify the persons responsible and target dates to ensure timely resolution of open items.</li><li>•DCCA Technical leads to prioritize and escalate critical issues.</li></ul>	Open	<p>02/28/23: Some data conversion activities are progressing; however, there are continued delays due to the reliance on third-party vendors and other pending decisions.</p> <p>03/31/23: Progress continues to be made for the various data conversion phases; however, they are behind schedule. The largest risk remains with the RDPMS to DocuSign Conversion. There is a currently a DocuSign limitation with the bulk import process, and alternative bulk upload approaches are being investigated and developed. Pacxa needs to develop an approach to test that all documents are uploading to DocuSign in the correct folder with the proper metadata. An approach to address how previously scanned documents can be converted to consumable format for the new Clariti solution is still pending.</p> <p>04/30/23: Progress continues to be made for the various data conversion phases. Some phases and activities are dependent on storage and other technical decisions.</p> <p>Accuity will continue to update and monitor data conversion activities and the impact of ongoing delays.</p>		
Process	2022.09.001	Risk	Low	High	<p>Current project delays may impact the overall project timeline.</p> <p>Improvements to the schedule management processes are needed to better estimate time needed to complete tasks, more quickly detect when tasks are falling behind schedule, and openly discuss options and strategies for minimizing delays. Strong schedule management practices help to keep the project on track and prevent reoccurring delays.</p>	<p>The Planning and Discovery stages were expected to be completed in early October 2022 but are estimated to be two weeks behind schedule. The detailed project schedule is a deliverable of the Planning stage and the information gathered during the Discovery stage to-date will be used to better estimate the work for the remaining stages of the Project. As such, it is unclear if the two week delay will have any impact on the overall timeline.</p>	<p>2022.09.001.R1 – Improve schedule management processes.</p> <ul style="list-style-type: none"><li>•Identify and address the root causes of the delays.</li><li>•Implement processes to monitor and report task delays.</li><li>•Consider using project performance metrics to better detect schedule trends and issues.</li></ul>	Open	<p>10/31/22: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). Completion of the Planning and Discovery stages is one month behind what was originally planned. The estimated completion date was initially extended two weeks in September 2022, extended another week in October 2022, and then extended again at the end of October. The delays are due to the pending completion and acceptance of project management plans, the detailed project schedule, and the RTM but it is unclear what the root cause of these ongoing delays are. The trend of repeated revised due dates needs to be further investigated and addressed.</p> <p>11/30/22: The baseline project schedule was developed and is currently under DCCA review. This schedule will be used to monitor progress going forward. As additional tasks are to be added, actual dates and progress percentages tracked, and the schedule is not resource loaded, we will continue to assess its effectiveness in managing the project.</p> <p>12/31/22: The baseline project schedule was approved; however, there are some delayed tasks. Additional improvements are needed to more closely monitor the schedule and project progress.</p> <p>01/31/23: There are some delayed technology activities that may impact future JAD sessions and the overall timeline if not addressed in the upcoming weeks. These delays are being tracked on the RAID Log.</p> <p>02/28/23 and 03/31/23: Accuity increased the severity rating from Level 2 (Moderate) to Level 1 (High). It is unclear if ongoing schedule delays will impact the overall timeline. Additionally, key pending decisions and technical issues could significantly impact the ability to meet the aggressive December 2023 Go-Live date.</p> <p>04/30/23: The change in architecture and design will push back the December 2023 Go-Live date. The project schedule will be re-baselined upon making key technical decisions. Some project deliverables and activities are on hold, delayed, or will need to be updated based on the technology direction selected.</p> <p>Accuity will continue to evaluate schedule management practices.</p>		

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
People	2022.08.002	Risk	Low	Moderate	Insufficient DCCA project resources may lead to project delays, reduced project performance, or turnover of project resources.	It is unclear at this time if there are adequate DCCA project resources to efficiently perform project work to achieve the aggressive high-level timeline. DCCA did contract an external full-time Project Manager (Aalta) who officially onboarded at the end of August 2022. Having a dedicated and experienced resource in the Project Manager role has been shown to increase project success compared to a resource who is often pulled back to perform regular job duties. DCCA also appointed resources for the OCM and communications lead roles; however, other project roles and resources are not yet identified. The new DCCA Project Manager is working to identify the additional DCCA workstream lead roles (e.g., data conversion lead, testing lead) needed to efficiently and effectively perform project work as well as identify potential candidates within DCCA to fill these lead roles. A common issue in SOH modernization projects is that assigned resources must often balance competing priorities of project work and ongoing operational work. Additionally, assigned resources don't always have the necessary experience or knowledge of how to perform the project tasks. It is critical that a resource plan to backfill and train DCCA resources is developed to prevent project delays.	<p>2022.08.002.R1 – Evaluate project resource needs and acquire additional resources.</p> <ul style="list-style-type: none"><li>•Estimate resource time requirements and identify required knowledge or skillsets.</li><li>•Develop a plan to minimize the impact to operations (e.g., backfill, reassign work) so that assigned project resources are not pulled back from project work.</li><li>•Get commitments from resources and management for the time needed to perform project work.</li></ul> <p>2022.08.002.R2 – Provide adequate training and support to assigned resources to be able to perform role.</p> <ul style="list-style-type: none"><li>•Consider performing general project management training so that resources understand general project processes and the purpose of project activities.</li><li>•Consider providing additional support and information to resources regarding best practices and common approaches for assigned tasks or areas of responsibility.</li></ul> <p>2022.08.002.R3 - Develop a plan and processes to optimize utilization of DCCA project resources.</p> <ul style="list-style-type: none"><li>•Ensure that only the necessary resources are attending each of the various Build and Validation stage sessions.</li><li>•Plan out resources assigned to the various sessions that will be running in parallel to ensure there will be adequate resources and that resources are not overlooked.</li></ul>	Open	<p>09/30/22: DCCA is still in the process of identifying resources to assign to lead roles and brainstorming different resource management strategies (e.g., staging resources for different phases). DCCA also plans to hire additional employees in 2023 to mitigate the impact to operations.</p> <p>10/31/22: DCCA workstream lead roles were identified but the same resources were assigned to multiple roles. Additional resources are still needed. Additionally, many DCCA SMEs attend each of the ongoing Joint Application Design (JAD) sessions. As sprint meetings and demos will begin to run in parallel with the JAD sessions, DCCA needs to ensure that there will be adequate resources and that resources are not overbooked. We added an additional recommendation at 2022.08.002.R3 to use resource management strategies to optimize the utilization of limited DCCA project resources.</p> <p>11/30/22: DCCA plans to reassess resource needs once project activities begin to run in parallel. We will continue to assess the risk of inadequate resources once development sprints begin in December 2022 and when timing of the soft UAT cycles is determined.</p> <p>12/31/22: Project team members are generally able to keep up with current project activities. Additional project activities involving DCCA team members will begin to run in parallel with development Sprint 1 in January 2023.</p> <p>01/31/23: Project managers are working closely together and developed an approach to proactively communicate project activities and better facilitate the coordination of DCCA project resources. With growing technology delays, it is important to clarify technical lead roles to ensure tasks are assigned and completed timely (See 2023.01.002).</p> <p>02/28/23: Progress continues to be made in many project workstreams, but stronger task management, communication, and coordination of resources may help facilitate the completion of action items and ongoing delays.</p> <p>03/31/23: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). The Client Interim Review and JAD 13 sessions are going to occur simultaneously in May. IV&amp;V has raised the concern regarding resource constraints during this period, but the PMs feel confident that the DCCA resources will be adequate to perform these tasks at the same time. A schedule and resource plan for the Client Interim Review including assigned test scripts is still pending.</p> <p>04/30/23: Proper resource management planning is still a need. The impact of the pending technical decisions on resources should be carefully assessed, including the need for a revised resource management plan.</p> <p>Accuity will continue to assess the adequacy and management of project resources.</p>		
Process	2022.08.006	Risk	Low	Moderate	A lack of quantitative success metrics may lead to differences in the interpretation of project success.	Project goals were drafted; however, quantitative success metrics were not yet defined. Clear and measurable success metrics ensure that everyone is working to the same definition of success, that progress can be monitored, and corrective actions can be taken if necessary.	<p>2022.08.006.R1 – Formalize measurable goals and success metrics.</p> <ul style="list-style-type: none"><li>•Consider financial, nonfinancial, tangible, and intangible metrics such as operational key performance indicators (KPIs), customer or employee satisfaction, user adoption, return on investment, or cycle or processing times.</li><li>•Consider benefits realization management objectives as well as alignment to BREG goals.</li></ul> <p>2022.08.006.R2 – Collect baseline data and monitor progress.</p> <ul style="list-style-type: none"><li>•Consider methods for collecting data such as process mining, surveys, queries, observation, or open forums.</li><li>•Consider sources of data such as legacy systems, operations, and internal and external stakeholders.</li></ul>	Open	<p>09/30/22: The Project will work to define KPIs and success metrics.</p> <p>10/31/22, 11/30/22, 12/31/22, and 1/31/23: No updates to report.</p> <p>02/28/23: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). Project success metrics are delayed and may lead to differences in the interpretation of project success. The DCCA PM plans to finalize the metrics in March 2023.</p> <p>03/31/23: Project success metrics are still not defined and an updated target date is not available.</p> <p>04/30/23: Project success metrics are under development and expected in May 2023.</p> <p>Accuity will review selected metrics once selected.</p>		



ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2022.11.001	Risk	Moderate	Moderate	Unclear project deliverables and schedule for the contracted DCCA project manager could impact the execution of Aalta and DCCA's project management responsibilities and activities.	<p>In August 2022, DCCA contracted Aalta to provide project management services for the BRM Project. Aalta's proposal provides the details of their approach for performing the high-level scope of work outlined in their contract. The following is a summary of IV&amp;V observations regarding the Aalta contract:</p> <ul style="list-style-type: none"><li>•A number of reports, activities, and work products were discussed in Aalta's methodology as described in their proposal; however, it is unclear if these are to be performed.</li><li>•Based on the description of the activities and work products from Aalta's proposal, it seems that some of these tasks would have been already performed as a part of the planning stage.</li><li>•A project schedule of Aalta tasks (e.g., reports, work products, deliverables) is pending.</li><li>•Some of Aalta's scope of work and deliverables overlap with Pacxa's contract (e.g., organizational change management plan, training plan).</li><li>•In the first three months of Aalta's contract, Aalta's lead project manager changed three times which may have contributed to the delayed execution of tasks.</li></ul> <p>A clear understanding of the Aalta's scope of work, approach, and timeline is necessary to ensure a smooth execution of project management activities for optimal team and project performance.</p>	<p>2022.11.001.R1 – Clarify Aalta's contract requirements.</p> <ul style="list-style-type: none"><li>•Discuss the reports and work products from Aalta's proposal and classify as either 1) contract deliverables or 2) activities that Aalta only assists the project with.</li><li>•For each contract deliverable, clarify purpose, content, and expectations.</li><li>•For activities that Aalta only assists with, clearly outline the respective roles and responsibilities of each party.</li><li>•Consider whether contract deliverables and activities still make sense for the areas of overlapping scope of work.</li></ul> <p>2022.11.001.R2 – Provide schedule information for Aalta tasks.</p> <ul style="list-style-type: none"><li>•Provide the appropriate detail of tasks, durations, due dates, milestones, and deliverables.</li><li>•Consider either developing a separate schedule or incorporating into Pacxa's project schedule.</li></ul>	Closed	<p>12/31/22: Accuity decreased the severity rating from Level 2 (Moderate) to Level 3 (Low) as Aalta clarified and delivered some of their contract deliverables including monthly reports, project management plan, and quality assurance surveillance plan. Additional clarification of Aalta's contract requirements and deliverables is needed.</p> <p>01/31/23: Aalta confirmed their contract deliverables. A timeline and schedule for open deliverables is still pending.</p> <p>02/28/23: Accuity increased the severity rating from Level 3 (Low) to Moderate as many key PM deliverables are still pending including the criticality and risk assessment (CARA) report, interim User Acceptance Testing (UAT) Plan, project success metrics, and performance work statement (PWS) dashboard. Although some preliminary drafts and demos have been provided, additional information is needed on how to implement those plans and processes to successfully execute upcoming project activities (see preliminary concern 2023.02.002).</p> <p>03/31/23: Although the UAT Plan is still high level, Aalta held several meetings to walk through UAT responsibilities and processes. The PWS dashboard</p> <p>Accuity will continue to review Aalta's contract requirements and deliverables.</p>	03/31/23	Closed as Aalta's project deliverables were defined. The recommendation to provide schedule information for Aalta's tasks was incorporated into observation 2023.02.002.
People	2022.08.003	Risk	Low	Low	A delay in formalizing the executive steering committee may limit the strategic guidance and support to the project.	The Pacxa kickoff presentation noted that a governance model will be developed. The topic of a steering committee was also raised during meetings. However, the selection of the steering committee members and kickoff of the committee meetings are still pending.	<p>2022.08.003.R1 – Assemble and formalize an executive steering committee.</p> <ul style="list-style-type: none"><li>•The size and selection of committee members should balance the representation of key stakeholders with the need for efficient decision making.</li><li>•Formalize the committee mission, responsibilities, and the types and the thresholds of decisions that need committee approval in a steering committee charter.</li></ul>	Closed	<p>09/30/22: DCCA is still in the process of formalizing steering committee members and documenting the governance model.</p> <p>10/31/22: The steering committee members were selected and the first meeting is expected to be scheduled in November 2022. Committee meetings should commence soon to ensure there is adequate guidance, support, and oversight of the project.</p> <p>11/30/22: The project governance model was established and the first executive steering committee (ESC) meeting was held.</p>	11/30/22	Closed as the governance model was established.
Process	2022.08.004	Risk	Low	Low	A lack of cost management practices may lead to unexpected or improper costs.	Major project costs were finalized for the system implementor (Pacxa), project manager (Aalta), and IV&V (Accuity) contracts. However, it is unclear how the complete project budget will be managed and how additional costs outside of the major contracts will be identified. For example, certain assumptions were made regarding the use of existing enterprise licensing for DocuSign CLM and Salesforce community licenses. As additional information and clarification of technical requirements is obtained, these assumptions and the potential additional costs must be closely managed. Other costs for project tools (e.g., code repository, project management, testing) should also be considered and managed.	<p>2022.08.004.R1 – Prepare a comprehensive project budget and a schedule of long-term operational costs (e.g., licenses, subscriptions, maintenance, cloud services).</p> <p>2022.08.004.R2 – Develop DCCA cost management processes.</p> <ul style="list-style-type: none"><li>•Develop processes to prepare cost variance analysis and reports.</li><li>•Develop processes to monitor contract deliverables against payment terms.</li></ul>	Closed	<p>09/30/22: The contracted DCCA Project Manager will be responsible for monitoring and reporting costs for the project contracts. DCCA still needs to determine who will be responsible for managing and procuring other project costs (e.g., additional licensing, project tools).</p> <p>10/31/22: Processes for monitoring contract costs and tracking a comprehensive project budget still need to be formalized.</p> <p>11/30/22: The additional procurement for licensing was completed. Other costs related to a conversion tool for proprietary format files and the project management tool will be covered by Pacxa's contract and are not additional project costs. The contracted DCCA project manager will identify potential project costs and will be responsible for monitoring Pacxa contract deliverables for milestone payments.</p>	11/30/22	Closed as sufficient cost management processes are in place.
Process	2022.08.007	Risk	Prelim	Moderate	Key technical decisions are pending and may impact the project schedule and costs (Updated).	<p>This was originally reported in the August 2022 IV&amp;V Monthly Report as a preliminary concern but was upgraded to a risk in September 2022.</p> <p>There are some key technical decisions that are pending (e.g., DocuSign repository, Salesforce org, NIC). Pending decisions could impact progress for configuring the solution for the upcoming Joint Application Design (JAD) sessions in late October 2022 as well as the development of the data conversion plan. These key technical decisions need to be made in a timely manner to prevent impact to the project schedule. Further discussions are still needed to understand potential costs, project impact, and risk mitigation options. A plan of action needs to be developed and closely monitored to manage the many individual but critical tasks needed for timely resolution.</p>	<p>2022.08.007.R1 – Discuss possible options.</p> <ul style="list-style-type: none"><li>•Risks, costs, and impacts for each option must be clearly communicated and understood.</li></ul> <p>2022.08.007.R2 – Set a plan of action.</p> <ul style="list-style-type: none"><li>•Detail out the tasks, targeted due dates, and responsible parties.</li></ul>	Closed	<p>09/30/22: This was originally reported in the August 2022 IV&amp;V Monthly Report as a preliminary concern but was upgraded to and rewritten as a risk this month with recommendations. The project team did discuss a couple possible mitigation strategies to minimize the potential impact to the project schedule of the pending technical decisions. However, there may be other risks that these strategies will create. While it is critical that the decisions are made in a timely manner, it is also important that these options and associated risks must be thoroughly discussed and fully understood by the Project.</p> <p>10/31/22: Progress was made on key technical decisions but final resolution is still pending.</p> <p>11/30/22: Key technical decisions were made regarding the system architecture of the DocuSign and Salesforce orgs. Decisions were also made regarding data conversion (e.g., conversion tool, NIC) allowing data conversion planning activities to move forward.</p>	11/30/22	Closed as key decisions were made. Although this risk was addressed, the execution and implementation of the decisions will continue to be monitored for impact to the project. Additionally, as the speed of execution to make these decisions could be improved, we will continue to evaluate schedule management processes in observation 2022.08.002.

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
People	2022.08.001	Positive	N/A	N/A	The project team environment between Pacxa and DCCA is collaborative and respectful.	The project team members regularly seek feedback, input, and clarification in an open and respectful manner. The experience and knowledge of Pacxa team members combined with the dedication and high level of engagement from DCCA SMEs support the positive project team environment.	N/A	Closed	N/A	09/30/22	Closed as this is a positive observation.
Process	2022.08.005	Opportunity	N/A	N/A	Implementation of recurring meetings help to promote frequent and focused discussions.	Recurring meetings help to promote collaboration and transparency, engage project team members, and coordinate various workstreams. They also provide regular touchpoints and communication channels to help keep critical project activities moving forward. Recurring project management meetings provide visibility of all project activities to Pacxa, DCCA, as well as IV&V. Recurring technical meetings have worked well in other projects as standing meeting to discuss different technical issues or topics. Recurring risk meetings promote regular and focused discussion of risks and mitigation strategies.	2022.08.005.R1 – Implement recurring meetings. •Ensure meetings are productive and fosters open and safe communication. •Adjust the cadence as needed depending on the needs and activities of the project.	Closed	09/30/22: Weekly project manager and team meetings were implemented. DCCA also plans to kickoff recurring technical meetings in October 2022. Risks will be discussed in the weekly team meetings. The need for separate risk-focused meetings will be reassessed later.	09/30/22	Closed as the Project established a plan for recurring meetings and began to implement meetings.



## *Appendix D: Comment Log on Draft Report*

## Comment Log on Draft Report

BRM Project: IV&V Document Comment Log				
 				
ID #	Page #	Comment	Commenter's Organization	Accuity Resolution
1	6	There is an observation within the Assessment area "Process – Approach and Execution" citing a delay on the Pacxa side for the Quality Management Report deliverable which was planned for March. There is a misunderstanding about the due date for this deliverable. This deliverable was to be submitted prior to the start of the CIRs and UAT. And the first version is only due in May prior to start of CIR.	Pacxa	IV&V was incorrectly referencing the due date of the Deliverable Expectation Document (DED), reviews, and comments. The report is updated to remove the reference to the Quality Management Report deliverable being due in March.
2	6	<p>Regarding bullet #2 under Process</p> <p>The change management plan is a Pacxa deliverable that is going to be put in place after the final decision is made. There is a 3-week discovery period after which Paxca will create a report with an impact analysis on all areas of the project. Technology, Cost, and Timeline. The Change Management Plan documentation process will start after DCCA reviews the Discovery report and makes a final decision taking into consideration its findings.</p> <p>DAR (Decision analysis and resolution) process is a tool proposed by the PM to facilitate and document this decision-making process, even though is not required it has been encouraged since the beginning of this process. PM has walked the team through the concept and the process of DAR and has facilitated its application.</p>	Aalta	<p>Statements and status from Aalta related to the Change Management Plan and DAR Process are noted. Aalta provided DCCA with the proposed DAR process, but the outlined process does not identify the respective roles and responsibilities between DCCA and Aalta for executing the DAR process. IV&amp;V's statement that it is unclear whose role it is to facilitate and lead DCCA through the DAR process, whether it be an appointed DCCA lead or the DCCA contracted PM, remains true and unchanged. Additionally, IV&amp;V continues to recommend that DCCA and Aalta clarify roles and expectations (2023.02.002) so that both parties understand their respective roles.</p>



ID #	Page #	Comment	Commenter's Organization	Accuity Resolution
				Accuity will continue to assess these areas, and any progress made will be reflected in future IV&V reports and IV&V's Observations and Recommendations Log. No changes made to the April IV&V Report.
3	6	<p>Regarding bullet #4 under Process</p> <p>The system Architecture and Design documentation deliverable is due on 11/2023, and the Security Management Plan is due on 09/2023. The cloud environment procurement occurred before Aalta joined the team. This seems like IV&amp;V should have been involved in this review independently of the PM.</p> <p>There is a process in place to track and trace requirements. Aalta has developed a PWS Dashboard on Smartsheet that tracks contractual requirements and points to SI's documentation and deliverables that fulfill each requirement.</p> <p>There is also an RTM where business, technical and functional requirements are tracked. This Spreadsheet points to the ADO tool where the SI documents the development process.</p> <p>DCCA PM is working with Pacxa's PM to develop a dashboard/report that summarizes requirements traceability for leadership consumption.</p>	Aalta	<p>Statements from Aalta regarding the Architecture and Design documentation, IV&amp;V's role, PWS Dashboard, and RTM are noted. No changes were made resulting from the statements.</p> <p>With regards to IV&amp;V's statements about the requirements management process, the information below provides additional background to further explain and support the identified risks and lessons learned:</p> <p>In August 2022, Aalta was contracted to "support the DCCA to help ensure that the selected IT vendor adheres to its contract scope and terms and conditions" and to "monitor project scope and budget". Aalta provided their methodology for scope and requirements management in their proposal stating "Aalta will work with DCCA to decompose the SI contract into a Performance Work Statement (PWS) matrix to facilitate tracking the contract scope, requirements, terms, objectives, and conditions against the SI's deliverables and activities. The Aalta PM will work with DCCA to develop objective and measurable standards that are traceable to terms and conditions of the SI contract. Using the PWS, the Aalta PM will reconcile the outcomes of routine meetings, minutes, status reports, key decisions, and deliverables to the contract scope, terms, objectives, and conditions."</p>

ID #	Page #	Comment	Commenter's Organization	Accuity Resolution
				<p>Pacxa's Joint Application Requirements (JAR) sessions to reconfirm contract requirements were completed in September 2022 with the FedRAMP requirement unchanged. Pacxa's Joint Application Design (JAD) sessions to translate system requirements into user stories kicked off in late October 2022. DCCA procured the separate Salesforce instance in November 2022.</p> <p>In November 2022, after observing the BRIMS Project's requirements management processes employed during the JAR and JAD sessions as well as the processes for making key technical decisions, IV&amp;V identified a risk (2022.11.001) that there were discrepancies in the work Aalta was performing as compared to the requirements of their contract and their proposed methodology. For example, Aalta's proposed methodology noted above to use the PWS to reconcile the outcomes of meetings, key decisions, and deliverables to contract requirements was not yet being performed. IV&amp;V recommended that Aalta's contracted responsibilities should be clarified. In December 2022, Aalta confirmed their continued intent to execute their proposed PWS methodology to monitor the SI's contract scope.</p> <p>In January 2023, IV&amp;V identified a risk (2023.01.001) regarding the requirements management processes noting that Aalta's PWS tool was incomplete, not yet put into use, and the process to approve requirements was still not defined. As the project was already in JAD session 9 and development sprint 3, the project was in need of a clear requirements</p>

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				<p>management process. IV&amp;V recommended that Aalta should formalize and communicate the process to review and accept project requirements and to develop clear traceability for contract requirements.</p> <p>In February 2023, IV&amp;V identified a risk (2023.02.002) that the untimely completion of Aalta's project management responsibilities could impact project execution. IV&amp;V recommended that DCCA and Aalta continue to clarify roles and expectations and to develop a project schedule to manage Aalta's tasks.</p> <p>In March 2023, Aalta provided a high-level walkthrough of the PWS tool showing how the SI's contract requirements would be tracked. However, the tool was still being refined and it was unclear if Aalta would provide DCCA with a formal report regarding the results of their first pass of the SI's adherence to contract requirements. As of April 2023, the process and cadence to update, report, and approve the contract requirements is still unclear.</p> <p>No changes were made to the IV&amp;V report resulting from the above. Accuity will continue to assess these areas, and any progress made will be reflected in future IV&amp;V reports and IV&amp;V's Observations and Recommendations Log.</p>



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