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October 27, 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 Human Services, Systems Modernization Project.

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

Sincerely,

Douglas Murdock Chief Information Officer State of Hawai'i

Attachments (2)



Hawaii Department of Human Services Systems Modernization Project

Final IV&V Status Report for Reporting Period: September 1 – 30, 2023

Submitted: October 18, 2023



Solutions that Matter

Overview

- Executive Summary
- IV&V Findings and Recommendations
- <u>IV&V Engagement Status</u>
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Solutions that Matter

Executive Summary



Executive Summary



In addition to the 8-week delay of the BES Implementation reported last month, the ASI is proposing to remove the BES Self-Service Portal requirements and functionality from the Pilot implementation release and complete the development and testing after Go-Live. This is intended to allow the Project team to focus on developing the core BES functionality while Hawaii citizens can continue to use the current PAIS portal in production to complete an application for BES benefits. It is not yet determined how PAIS data will be integrated into BES during the Pilot and after Go-Live.

IV&V areas of focus include:

- The new process of the ASI delivering Sprint Demo recordings for DHS review has generated minimal feedback. It is
 unclear to IV&V if the lack of DHS feedback will have an impact on the BES solution, but DHS is adding more review staff
 to ensure that timely feedback is provided to the ASI.
- The ASI has an open action item to provide detailed list of functionality in Release 12 versus what will be deferred after Go-Live. This information is needed for OCM, Training, and implementation planning. The ASI plans to assign the Business Analysts to this activity when the Release 12 design phase is complete.
- Project testing remains a high-criticality area, with the ASI implementing improvements based on lessons learned. DHS
 and IV&V await the ASI's plan for how they intend to complete a full system test of all BES functionality prior to the start of
 Final Acceptance Testing.

In addition to the above, other aspects of the BES implementation include Service Level Management, Disaster Recovery, and Data Conversion as key areas that are in various stages of completion. Any further delays of functionality or key aspects may result in schedule impacts or changes to the planned business operations as the system is implemented.

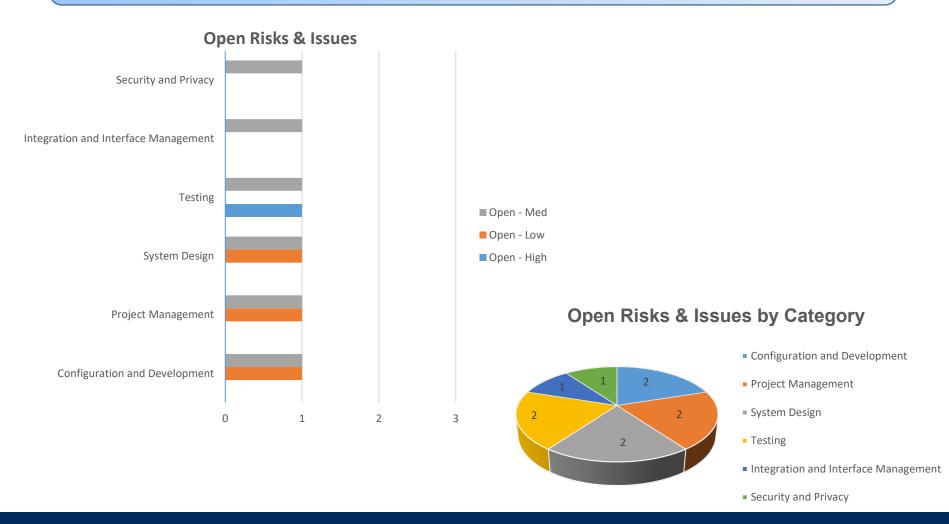
Jul	Aug	Sep	Category	IV&V Observations
M	M	M	Project Management	The DHS contract Project Manager left the project as of the September month-end. DHS is working to provide the Assistant Project Manager with temporary assistance while project management positions are filled, but the date this will occur is unknown.

Executive Summary

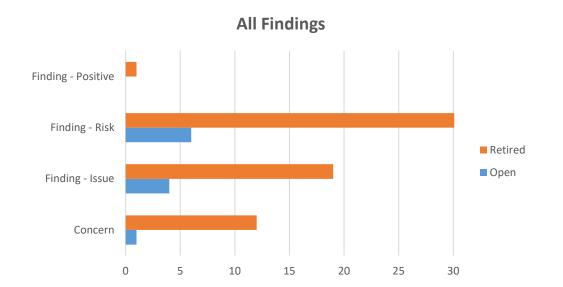


Jul	Aug	Sep	Category	IV&V Observations
M	м	М	System Design	The DHS Subject Matter Experts (SMEs) have raised concerns regarding the ASI "pushing back" on suggested design changes. IV&V recognizes the need to control scope, but if it is determined the changes are needed for the core system this could lead to rework later in the development process.
M	М	M	Configuration and Development	With DHS approving items to be tracked by configuration management, IV&V awaits the final list of configuration items to review for comprehensiveness.
M	M	М	Integration and Interface Management	A key decision on the DoTAX interface was made by the Project to focus on designing a new interface rather than pursuing the legacy interface as a backup plan. DHS's concerns regarding ASI updates to Functional Design Documents were also addressed.
Н	н	н	Testing	The ASI's formal ADA testing started ahead of schedule (August 1 st). To address DHS' numerous testing concerns, the ASI is implementing several improvements to the testing process.
M	M	М	Security and Privacy	The primary focus for the Security and Privacy team shifted from finalizing the System Security Plan (SSP) to completing the design for the Secure Enclave, which is needed for storing and handling regulated data (including Federal Tax Information, or FTI). Having this design in place is needed to finalize the SSP.

As of the September 2023 reporting period, PCG is tracking 10 open findings (6 risks, 4 issues) and has retired a total of 68 findings. Of the 10 open findings, 1 are High, 6 are Medium, and 3 are Low.



The following figure provides a breakdown of the 79 IV&V findings (positive, risks, issues, concerns) by status (open, retired).





Findings Retired During the Reporting Period

#	Finding	Category
	None	



Preliminary Concerns Investigated During the Reporting Period

#	Finding	Category
	Preliminary Concern – The current approach to UAT may not be complete, which increases the likelihood of missing deadlines.	
84	The Project completed R11.1 UAT, however, some UAT processes still have not been well-defined. For example, there was confusion if UAT testers need to review existing defects, including INT/SIT defects, before creating a new defect to avoid duplicates. The Project developed a lessons-learned report and identified key areas to improve such as how to manage defects and how to communicate scope effectively. IV&V will continue to monitor the ASI efforts toward the recommendations of this finding.	Testing

Recommendations	
Conduct comprehensive Final User Acceptance Testing (FAT)planning	Not Started
 Conduct lessons learned session to incorporate into FAT, including updates of all processes, procedures, roles and responsibilities 	Completed
Train testing resources early before FAT begins and walk through end-to-end scenarios.	Not Started
 Develop contingency plans if Release 11.1 UAT does not proceed as planned. 	Completed



Findings Opened During the Reporting Period

#	Finding	Category
	None	

Project Management

#	Key Findings	Criticality Rating
29	Issue – Uncertainty and/or a lack of communication around long-term architecture decisions could impact the project budget, schedule, system design, and planning decisions.	
	The ASI updated and delivered four chapters of the BI-12 System Architecture Deliverable, currently under DHS/IV&V review. If DHS agrees to postpone implementation of the BES Portal functionality until after Go Live, further changes may be necessary to the overall architecture to include the planned architecture for the interfaces and PAIS application (PAIS is the current solution for Hawaii citizens to complete an application for BES benefits). The four chapters currently under review are:	L
	BI-12 Audit System Chapter	
	BI-12 BES Shared Services Chapter	
	BI-12 Self-Service Portal Chapter	
	BI-12 Physical Architecture Chapter	

Recommendations	
 The ASI should continue to update the BI-12 System Architecture Deliverable with additional details as they become available and with any finalized architectural changes. 	In process
 DHS should continue to ask the ASI to perform due diligence in any recommendation for foundational architecture change decisions and continue to review with appropriate DHS stakeholders (e.g., KOLEA) to assure a common understanding of the implications of these decisions. 	In process
 The Project should continue to ensure communication between development leads and architecture leads to assure optimal collaboration on possible architecture changes that could impact decisions in each area. 	In process



Project Management

#	Key Findings	Criticality Rating
	Issue – A BES Project schedule based on inaccurate estimations diminishes effective planning and resource management, which could result in late deliverables, cost increases, and a late go-live.	
74	The ASI re-baselined both the Primary and DDI BES Implementation schedules, adding 8 weeks to release 0.12 and addressing DHS and IV&V's concerns that the prior schedules were underestimating the effort required to complete the remainder of the Project. As the ASI requested to shift the Portal functionality after statewide implementation, IV&V remains concerned other requirements may also be delayed. This may cause downstream impacts on UAT planning and execution, Training, Organizational Change Management, and Operational readiness to plan for any required workarounds and manual processes.	M

Recommendations	Progress
Monitor, evaluate and revise scheduling estimates for accuracy.	In Process
 ASI plan and execute Epic development so that Epic demos can occur earlier in the release schedule and allow time for possible revisions. 	Not Started
 ASI hosts a weekly meeting with DHS and IV&V to review all changes to the project schedules (Primary and DDI). 	In Process
 ASI provide details on how Velocity measures were used to develop estimations for development effort in new version of DDI schedule 	In Process



Integration and Interface Management

#	Key Findings	Criticality Rating
	Risk – The lack of early planning and coordination with interface partners may result in schedule delays.	
63	The Memorandums of Agreement and the Memorandums of Understanding (MOAs and MOUs) are being reviewed. Seven of twenty-eight MOAs, including the DLIR interface, have expired or will expire by the end of 2024. DHS/ASI has yet to provide a target date for resolving the expiring MOAs and MOUs. IV&V will continue to monitor MOA and MOU items.	M
	The DHS concern that the ASI was changing Functional Design Documents (FDDs) without DHS knowledge has been reviewed and resolved through meetings with DHS and the ASI.	
	The review and completion of the Interface Control Documents (ICDs) are in progress, with 4 of 25 ICDs outstanding. The progress of the ICDs and Interface Epics will continue to be monitored by IV&V.	

Recommendations	Progress
Complete all MOAs and obtain approval.	In process
Confirm testing dates with interface partners in writing.	In process
 Complete early proof of concept interfaces to avoid unexpected delays due to external organization miscommunications or their own internal delays in assisting the BES project. 	Not started



Configuration and Development

#	Key Findings	Criticality Rating
70	Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution. The ASI gained DHS' approval on the items that will be tracked and monitored as part of configuration management. IV&V requested the list last month and is waiting on the ASI to respond.	L

Recommendations		Progress
•	ASI adhere to plans for configuration management as documented in BI-6 DDI Plan, Section 5.2 and clarify details and/or any changes with DHS.	In process
•	ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track.	In process
•	DHS and ASI work to clarify/solidify plans for the potential use of configuration management tools and DHS work to fund and procure a CM tool, as required, to avoid any negative impacts to the project.	In process



Configuration and Development

#	Key Findings	Criticality Rating
80	Risk – Development delays could negatively impact the project schedule and delay go-live. Though the Project has decided to focus on core functionality for Go-Live, DHS SMEs remain concerned that the ASI is pushing back on some important design refinements. They have noted that the ASI decision to record demos instead of having live collaboration sessions with SMEs could hinder good design and slow their design feedback. If critical refinements are discovered late into the development lifecycle, it may necessitate last-minute development and could potentially result in schedule delays. Alternatively, if the project elects to go live with a system that falls short of user expectations, user buy-in may prove to be a	M
	challenge.	

Recommendations	Progress
• DHS request the ASI strategically add the right project team resources to effectively increase velocity. Note that adding additional junior resources may not be as effective as staffing additional expert-level development, analysis, and other resources that can lead and mentor junior resources.	In process
• ASI effectively track and regularly provide DHS (potentially via the weekly DDI status meeting) with an accurate velocity (e.g., story points per day/week/month) and assure that the current velocity is accurately and consistently reflected in the project schedule.	In process
 The ASI should provide DHS with the time needed to effectively evaluate the software demonstrations (demos) and elicit productive design discussions with DHS attendees during each demo. 	In process
 ASI regularly reports estimated story points for the total remaining project work to reach go-live and presents a dynamic burn-down chart to track the progress. 	Not started

System Design

#	Key Findings	Criticality Rating
	Risk – The planned BES infrastructure is complex which could be difficult to implement and maintain and could lead to schedule/cost impacts.	
73	The ASI has experienced turnover of their Enterprise Architect position; this does not appear to have had a material impact on the overall infrastructure build. The ASI continues to make progress in the build-out of their infrastructure and is confident that the automation they've implemented will simplify many maintenance tasks given that, they remain confident they will be able to meet infrastructure milestones without hindering development. The ASI has also stated that maintaining the system post-go-live will not require excessive effort and that achieving the SLAs will be possible. IV&V remains concerned that some planned elements of the infrastructure have yet to be thoroughly architected, documented, and/or conceptually tested via proof of concept (e.g., the secure enclave and disaster recovery environment).	

Recommendations	Progress
 ASI develop a process to closely monitor cloud and other product changes (software updates/new releases), manage changes, and regression test once updates are applied. 	In process
 The project team work to establish strong governance over the utilization and maintenance of various tools/components. 	In process
 ASI allot time in the schedule to conduct proof of concepts to assure infrastructure components work as expected. 	In process
 ASI maintain a detailed schedule for DevOps implementation tasks to avoid unexpected delays that could delay project milestones and the critical path. 	In process

System Design

#	Key Findings	Criticality Rating
86	Issue – Limited collaboration between the ASI and DHS in the design process could lead to BES and BES-SSP usability issues and functionality gaps in the applications, and not meeting critical business needs for DHS and State clients.	
	The DHS PMO reported that DHS SMEs have provided minimal feedback to the ASI on the four recorded Sprint demos this month. This supports IV&V's concern that the new process will reduce collaboration to confirm that designs are in alignment with DHS expectations. IV&V added a recommendation that the ASI and DHS re-evaluate the effectiveness of this new process.	M

Recommendations		Progress
•	Include a wide enough audience in all design and demo sessions to validate FNS and DHS functional and technical requirements and system usability.	In Process
•	Perform Sprint and Epic demos in alignment with development sprint completion (demo functionality/requirements as they are developed) to get early feedback on work products.	Not Started
•	Perform comprehensive (demo all requirements) review during Epic demos, not just the items that were added/updated, allowing DHS to provide early feedback on possible issues/gaps that might not be apparent when focusing on specific functionality.	Not Started
•	ASI and DHS re-evaluate the effectiveness of the recorded Sprint review process to ensure that designs align with DHS expectations.	Not Started



Testing

	#	Key Findings	Criticality Rating
67	67	Risk - The Americans With Disabilities Act (ADA) Section 508 compliance tool has not been installed for the Project, which may cause significant rework. Formal ADA testing began ahead of schedule. The ASI reports continued use of UsableNet and is addressing issues the tool is identifying. The ASI created and shared a high-level ADA testing approach	м
		and implemented the process. It is too early to determine if adopting and using the tool after a significant portion of the system was developed will reveal numerous ADA defects that will impact project timelines or resources.	

Recommendations	Progress
The ADA tool meets contractual and project requirements.	In process
The ASI communicates a plan for ADA test execution.	In process
 The ASI communicates how the tool will be used to report compliance and non-compliance and how non- compliance will be addressed/corrected 	In process
The ASI provides DHS/IV&V reports from the ADA tool execution and explain how to interpret the results.	Not started

Testing

#	Key Findings	Criticality Rating
83	Issue – Gaps in test coverage and slower-than-expected progress in testing may result in schedule delays if subsequent test phases uncover a higher volume of defects and user feedback than initially anticipated.	
	Gaps (business requirements/functionality that may not have been tested sufficiently) in the Unit, Integration (INT), and System Integration Testing (SIT) phases continue to result in numerous defects found during UAT Release 11.1. To improve testing for Release 12, the ASI is implementing peer review processes to review test cases before tests are executed; is updating their testing dashboard to monitor testing progress more accurately; re-organized the test team to have dedicated Functional and Non- Functional test leads; and updating the test repository to accurately align with the test counts for each use case. Additionally, DHS plans to closely monitor that the ASI is meeting SIT entry criteria prior to starting SIT, which includes DHS reviewing and approving the ASI proposed SIT test cases.	H
Reco	mmendations	Progress
• Mo	nitor INT/SIT closely for both breadth and denth of testing to ensure the system is adequately tested	In process

•	Monitor INT/SIT closely for both breadth and depth of testing to ensure the system is adequately tested.	In process	
•	The project team reviews the SIT exit criteria and revises them as needed to ensure UAT/FAT begins with the best system possible.	In process	
•	ASI should determine the root cause of the failure to identify simple defects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT	In process	

Security and Privacy

#	Key Findings	Criticality Rating
	Risk – The lack of technical documentation may lead to incorrect implementation statements or delay the System Security Plan (SSP).	
82	At the beginning of September, the DHS Security SME completed draft implementation statements for all IRS-specific controls, and the base list of draft control implementation statements was also completed. The bulk of the month focused on designing the Secure Enclave. The Secure Enclave is an environment used to receive, store, and access regulated data, such as Federal Tax Information (FTI). The ASI has presented a draft diagram of the Secure Enclave.	М
	The ASI and DHS had various workshops with Google near the end of the month and allowed the team to present their thoughts on the design and implementation of BES, including the secure enclave, to get feedback from Google SMEs. At this point, the Secure Enclave is a higher priority than the System Security Plan, as the design and implementation of the Secure Enclave will impact the implementation statements in the SSP.	

Recommendations	Progress
Determine when the infrastructure design baseline will be completed.	In process
Determine when documentation will be created, updated, and available for the SSP authors.	In process
 Collaborate and communicate with SSP authors about when reliable and correct documentation will be available. 	In process
 Perform a full review of all SSP controls for content and accuracy that have been written as drafts prior to December 15th, 2023. This will allow the SSP authors to update controls with changes from Design through Implementation. 	Not Started

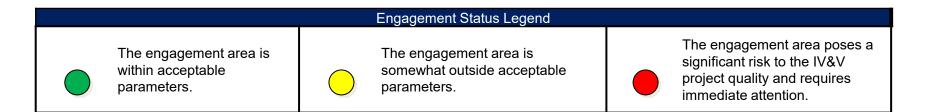






IV&V Engagement Status

IV&V Engagement Area	Jul	Aug	Sep	Comments
IV&V Budget				
IV&V Schedule				
IV&V Deliverables				PCG submitted the final August IV&V Monthly Status Report.
IV&V Staffing				
IV&V Scope				



HI Systems Modernization Independent Verification & Validation Monthly Report: September 2023

IV&V Activities



- IV&V activities in the September reporting period:
 - Completed August Monthly Status Report
 - Ongoing Review the BES Project Artifacts and Deliverables
 - Ongoing Attend BES Project meetings, (see <u>Additional Inputs</u> pages for details)
 - Reviewed available ASI contracts and contract amendments documentation
- Planned IV&V activities for the October reporting period:
 - Ongoing Observe BES Design and Development sessions as scheduled
 - Ongoing Observe Bi-Weekly Project Status meetings
 - Ongoing Observe Weekly Architecture meetings
 - Ongoing Observe Weekly Security meetings
 - Ongoing Monthly IV&V findings meetings with the ASI
 - Ongoing Monthly IV&V Draft Report Review with DHS, ETS and ASI
 - Ongoing Participate in Bi-Weekly DHS and IV&V Touch Base meetings
 - Ongoing Review BES artifacts and deliverables

Deliverables Reviewed



Deliverable Name	Deliverable Date	Version
BI-5 Project Schedule - BES 2023 Primary	09/13/2023 09/27/2023	N/A
BI-5 Project Schedule - BES 2023 DDI	09/13/2023 09/27/2023	N/A
BI-10 Functional and System Design Document Template Updates	9/21/2023	N/A
BI-12 Audit System Chapter	9/25/2023	N/A
BI-12 BES Shared Services Chapter	9/25/2023	N/A
BI-12 Self-Service Portal Chapter	9/25/2023	N/A
BI-12 Physical Architecture Chapter	9/25/2023	N/A

Additional Inputs – Artifacts



Artifact Name	Artifact Date	Version
BES 2023 Design Kanban board	N/A	N/A
R0.11 Epic Assignment	N/A	N/A
FNS Handbook 901	01/2020	V2.4
NIST Special Publication 800-53 Security and Privacy Controls for Information Systems and Organizations	12/20/2020	Rev.5
SNAP_System_Integrity_Review_Tool	Sept 2022	N/A
Interface Dashboard – Confluence page	N/A	N/A
BES 2023 Implementation Planning – Confluence page	N/A	N/A
R0.12 Epic Assignment	N/A	N/A
UAT Testing Dashboard	N/A	N/A

Additional Inputs



Meetings and/or Sessions Attended/Observed:

- 1. IV&V Team Meeting 9/5/2023, 9/7/2023, 9/11/2023, 9/14/2023, 9/18/2023, 9/25/2023, 9/28/2023
- 2. IV&V September 2023 Pre-Draft MSR Findings Review 9/6/2023
- 3. HI DHS BES August Draft IV&V Report Review 9/15/2023
- 4. Bi-Weekly DHS and IV&V Touch Base 9/5/2023, 9/18/2023
- 5. Weekly BES Infrastructure meeting 9/8/2023, 9/15/2023, 9/22/2023
- 6. DHS/IV&V Check-in 9/14/2023, 9/28/2023
- 7. Bi-Weekly Client BES 2023 Project Status Meeting 9/6/2023, 9/20/2023
- 8. Security Touchpoint 9/6/2023, 9/13/2023, 9/20/2023, 9/27/2023
- 9. R0.11.1 Go/No Go (SIT exit criteria) 9/5/2023
- 10. R0.11.1 UAT Huddle 9/6/2023, 9/7/2023, 9/8/2023, 9/18/2023, 9/19/2023, 9/20/2023, 9/21/2023, 9/22/2023
- 11. R0.11.1 UAT Triage 9/5/2023, 9/6/2023, 9/7/2-23, 9/8/2023, 9/18/2023, 9/19/2023, 9/20/2023, 9/21/2023
- 12. R0.11.1 UAT Readiness Checkpoint 9/15/2023
- 13. PMO End of Day Huddle 9/12/2023, 9/14/2023, 9/26/2023, 9/28/2023
- 14. (External) Weekly Interfaces Touchpoint 9/11/2023
- 15. (External Pre-design) CMM Interface FDD Cont'd discussion- 9/8/2023, 9/15/2023, 9/22/2023, 9/28/2023
- 16. (External) UI Standards Monthly Review 9/6/2023
- 17. (External) Readiness Working Group Meeting- 9/12/2023, 9/19/2023, 9/26/2023
- 18. (External) Bi-Weekly Client BES 2023 Schedule Review/Status 9/13/2023, 9/27/2023
- 19. (External) BES System Security Plan Controls 9/5/2023, 9/12/2023
- 20. (External) Bi-weekly BES CCB Meeting 9/13/2023, 9/27/2023
- 21. Pre-design EPIC 237: Federal Collection Activity (Fed Tax Offset revisit) 9/19/2023
- 22. (External Client Design) Epic 208 Mass Change Design Session 9/21/2023







Appendix A – IV&V Criticality Ratings

Criticality Rating	Definition
Н	A high rating is assigned if there is a possibility of substantial impact to product quality, scope, cost, or schedule. A major disruption is likely, and the consequences would be unacceptable. A different approach is required. Mitigation strategies should be evaluated and acted upon immediately.
M	A medium rating is assigned if there is a possibility of moderate impact to product quality, scope, cost, or schedule. Some disruption is likely, and a different approach may be required. Mitigation strategies should be evaluated and implemented as soon as feasible.
L	A low rating is assigned if there is a possibility of slight impact to product quality, scope, cost, or schedule. Minimal disruption is likely, and some oversight is most likely needed to ensure that the risk remains low. Mitigation strategies should be considered for implementation when possible.

Appendix B – Findings Log



• The complete Findings Log for the BES Project is provided in a separate file.

Appendix C – Acronyms and Glossary



Acronym	Definition
APD	Advance Planning Document
ASI	Application System Integrator
BES	Benefits Eligibility Solution
CCWIS	Comprehensive Child Welfare Information System
CM	Configuration Management
CMMI	Capability Maturity Model Integration
CMS	Center for Medicare and Medicaid Services
CR	Change Request
DDI	Design, Development and Implementation
DED	Deliverable Expectation Document
DHS	Hawaii Department of Human Services
DLV	Deliverable
E&E	Eligibility and Enrollment
EA	Enterprise Architecture
ECM	Enterprise Content Management (FileNet and DataCap)
ESI	Enterprise System Integrator (Platform Vendor)
ETS	State of Hawaii Office of Enterprise Technology Services
FIPS	Federal Information Processing Standard
HIPAA	Health Information Portability and Accountability Act of 1996
IDM	Identity and Access Management (from KOLEA to State Hub)
IEEE	Institute of Electrical and Electronics Engineers
IES	Integrated Eligibility Solution
ITIL	Information Technology Infrastructure Library
IEEE IES	Institute of Electrical and Electronics Engineers Integrated Eligibility Solution

Appendix C – Acronyms and Glossary

Acronym	Definition
IV&V	Independent Verification and Validation
KOLEA	Kauhale On-Line Eligibility Assistance
M&O	Maintenance & Operations
MEELC	Medicaid Eligibility and Enrollment Life Cycle
MEET	Medicaid Eligibility and Enrollment Toolkit
MOU	Memorandum of Understanding
MQD	Hawaii Department of Human Services MedQuest Division
NIST	National Institute of Standards and Technology
OE	Operating Environment
OIT	Department of Human Services Office of Information Technology
PIP	Performance/Process Improvement Plan
PMBOK [®]	Project Management Body of Knowledge
PMI	Project Management Institute
РМО	Project/Program Management Office
PMP	Project Management Plan
QA	Quality Assurance
QM	Quality Management
RFP	Request for Proposal
ROM	Rough Order of Magnitude
RMP	Requirements Management Plan
RTM	Requirements Traceability Matrix
SEI	Software Engineering Institute
SLA	Service-Level Agreement
SME	Subject Matter Expert

Appendix C – Acronyms and Glossary

Acronym	Definition
SOA	Service Oriented Architecture
SOW	Statement of Work, Scope of Work
VVP	Software Verification and Validation Plan
XLC	Expedited Life Cycle

Appendix D – Background Information



Systems Modernization Project

The DHS Enterprise Program Roadmap includes contracting with three separate vendors with the following high-level scope:

- ESI or Platform Vendor responsible for the shared technology and services required for multiple Application vendors to implement and support functionality that leverages the DHS Enterprise Platform.
- ASI or ASI Vendor responsible for the DDI of the Benefits Eligibility Solution (BES Project) enhancing the currently implemented Medicaid E&E Solution (KOLEA) and providing support for the combined Solutions.
- CCWIS Vendor responsible for the DDI of the CCWIS Solution to meet the needs of child welfare services and adult protective services (CCWIS Project) and providing support for the Solution.

Systems Modernization IV&V Project

IV&V performs objective assessments of the design, development/configuration and implementation (DDI) of DHS' System Modernization Projects. DHS has identified three high-risk areas where IV&V services are required:

- Transition of M&O from DHS' incumbent vendor to the ESI and ASI vendors
- BES DDI
- CCWIS DDI

On the BES DDI Project, IV&V is responsible for:

- Evaluating efforts performed by the Project (processes, methods, activities) for consistency with federal requirements and industry best practices and standards
- Reviewing or validating the work effort performed and deliverables produced by the ASI vendor as well as that of DHS to ensure alignment with project requirements
- Anticipating project risks, monitoring project issues and risks, and recommending potential risk mitigation strategies and issue resolutions throughout the Project's life cycle
- Developing and providing independent project oversight reports to DHS, ASI vendors, State of Hawaii Office of Enterprise Technology Services (ETS) and DHS' Federal partners

Appendix D – Background Information



What is Independent Verification and Validation (IV&V)?

- Oversight by an independent third party that assesses the Project against industry standards to provide an unbiased view to stakeholders
- The goal of IV&V is to help the State get the solution they want based on requirements and have it built according to best practices
- IV&V helps improve design visibility and traceability and identifies (potential) problems early
- IV&V objectively identifies risks and communicates to project leadership for risk management

PCG's Eclipse IV&V® Technical Assessment Methodology

- · Consists of a 4-part process made up of the following areas:
 - 1. **Discovery** Discovery consists of reviewing documentation, work products and deliverables, interviewing project team members, and determining applicable standards, best practices and tools.
 - 2. Research and Analysis Research and analysis is conducted in order to form an objective opinion.
 - **3.** Clarification Clarification from project team members is sought to ensure agreement and concurrence of facts between the State, the Vendor, and PCG.
 - 4. Delivery of Findings Findings, observations, and risk assessments are documented in this monthly report and the accompanying Findings and Recommendations log. These documents are then shared with project leadership on both the State and Vendor side for them to consider and take appropriate action on.

IV&V Assessment Categories for the BES Project

- Project Management
- Requirements Analysis & Management
- System Design
- Configuration and Development
- Integration and Interface Management

- · Security and Privacy
- Testing
- OCM and Knowledge Transfer
- Pilot Test Deployment
- Deployment

Ending Slide



Solutions that Matter

HI DHS Monthly IV Status Report Final - September 2023

P Table Provide Provid	identified Date Category 8/1/2023 System Design	concerns raised by the DHS testers regarding the usability of the BES system, challenges with the user interface, missing functionality, and basic screen layout issues that would not be expected in a modern application. Based on	provide additional capabilities, greatly enhanced user interface, and overall improved usability from current systems. Should the solution fall short of	FNS and DHS functional and technical requirements and system usability. Perform Sprint and Epic demos in alignment with development sprint completion (demo functionality/requirements as they are developed) to go		Anslyst ility Priority 2 Med	Finding Status Open	Statu Lipóte (2) (2) (2) - 10 - 50 - 50 - 50 - 50 - 50 - 50 - 50	the items that I clarified with IV&V, that there are feedback given, no feedback means design is ok. I rec'd an emal back from Joe F. that IV&V	Vendor Comments
84 The convert WY approach may not be Tan, Ryan Concern complexe, which increases the likelihood of majorized dealline.	6/29/2023 Testing	Ability bare is an approved UK7 plan and an imperivoked institute toom, the Project approver uppergrand for finitiane 21 UKT for example, man- tering approversity index to Team State Protection are not fully developed.	Without a defined and developed UAT approach and resource plan, there is a potential risk of missing UAT timelines. However, the R11 UAT phase does	planning - Train testing resources early before FAT begins and walk throug	uat 3	1 Low	Open	\$100,0001 - The freque completed R11.1 UM, however, some UM processes will have not have well defined. The reasonable UMP well completed that the second processes are second and the second processes of the second processes of the second second processes are second as not second processes and the second processes are second processe		R0.12. There were a number of issues/defects that were not part of R0.11 but are included in R0.12.
mesang deadloos.		their groutset, including a family load Tracket, an entry by developed provide the second sec	not fail when the control path of Improved, and a Belged completion of the second path of the second path o	incorporate into FAT, including updates of all processes, procedures, roles and responsibilities (9/3102023) - Develop contingency plans if Release 1:				detects, before rearing a new detect to avoid significants. The Project developed a lessons-term of prot at deterfields by wars to improve our as how in manage affects and how is communic, test stope effectively. With developed lessons-term of provide significant by and to improve and developed lessons-term of the project schedule affects to 100 states terms of to prior its analysis detects to 100 states and Bit implementation delay, the training and test development timelines for H Priors Team updates the project schedule affect thread schedules Bit implementation delay, the training and test development timelines for H AV developmentation delay, the training and test development timelines the AV defects toward the recommendations of the finding. J J J J J J J J J J J J J J J J J J J		
83 Gapi nest coverge and slower drain. Tan, ipan Pinding - ceptical programs in testing may reach in the source schedule delays if subsequent inst phases freedback than initially anticipated.	6/7/2023 Testing	progress of testing might be lagging. Concerning testing coverage, it appears that not all epics and use cases in R11 have associated test cases or are testing the correct use cases. In terms of progress, some test cases remain unexecuted, and not all defects have been resolved as the project	identifying decise any is vala for effective testing, as it is more efficient and cost effective to advess sucis during the any training stages. If can reach it is down properties or incomplete testing in the any tages, it can reach it testing and the stages of the stage of the stages of the stages of the stages of the stage of the	simple defects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT. DHS and ASI monitor INT/SIT closely for both breadth and depth of testing ensure the system is adequately tested The Project team reviews the SIT exit criteria and reviess them as needed to ensure UAT/FAT Explicit with th	to	4 High	Open	5/12/223 – Carpic locations requirement/lucitotically that may not head board to the class difficulty in the durit, integration in numerous defects the location of the durit. Integration is the durit, integration of the durit, integration of the durit integration of t		10/11/2023 We also communicated to you all that we have new organized out test team to have dedicated Functional Test too the standard Test too the standard reference to the go decision for R0.11 decipite the defects being referenced.
82 The List of technical documentation may Health, Data Finding - liked to incorrect implementation statements Risk or delay the System Society Plan	4/27/2023 Security and Privacy	decisions on what tools support the SSP controls are still being decided on. Implementation statements are currently being written from the perspective	Once the system architecture and design have been completed the 9.99 authors may need to of creatite trajementation statement. A full of of the 3P is scheduled to be published August 151m, 2023, and the full dis- dicady for friend an public reveals is scheduled for specific trajectures of the SPP is a large technical document with handrads of control and control in the state of the state of the schedule of the schedule of the BP is a large technical document with handrads of control and control the control of enhancement has been met.	Progress - Determine when documentation will be created, updated, and available for the SSP authors In Progress - Collaborate and communicat with SSP authors about when reliable and correct documentation will be available In Progress - Perform a full review of all SSP controls for	2023 when the full to SSP is scheduled for completion and approval prior to sharing with	3 Med	Open	self2/2021. A this beginning of Segrember, in the DS Search 2004. sendinged aftri implemention statements for all Respectic controls, we then the same individual and the second control may be a the second control may be a set of the second control may be second set of the second control may be		

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Finding	Identified					Anal	yst Finding			
Protect Protect 10 Table Reporter Table 10 Development delays could regulavely impart. Fors, Michael Rending - 10 Development delays could regulavely impart. Fors, Michael Rending - 11 Development delays could regulavely impart. Fors, Michael Rending - 12 Altif Project schedule based on inaccurate Molina, Brad Rending - 12 Altif Project schedule based on inaccurate Molina, Brad Rending - 13 Development delays, coll proteot, and a bit go live. Issue Issue		manner. DHS and the ASI have tried multiple times to rework the schedule with results that have not yielded improvement. Concerns with the structure, we diminizing practice, and ability to mange the schedule practice, we diminize the holds to have a result and buy to mange the schedule practice.	Failure to achieve a law of a scarsary in estimating development tasks code and a a project schedule that is filled and numeralistic. Provide scale bad indicated, and MY agreed, that come of these delays were due to some specifications. The development of these delays were due to some carification from the ASI BA/A have. Det and WY descreted instances approximations from the ASI BA/A have. Det and WY descreted instances where ASI BA/A/A have presented less than specifications in the development outprice and the approximation of the activity of the activity of the ASI BA/A/A have presented less than some specifications in the activity of the solution of the activity of the activity of the activity of the activity of the solution of the activity of the activity of the activity of the activity of the solution of the activity of the activity of the activity of the activity of the solution of the activity of the activity of the activity of the activity of the solution of the activity of the activity of the activity of the activity of the solution of the activity of the solution of the activity of the activity of the activity of the activity of the solution of the activity of the solution of the activity of the solution of the activity of the activ	resource to effectively increase velocity. Note that adding additional junct encources may note as difference as utiling additional experiments development, analysis, and other memory table to a solid and encourses the solid solid additional additional process of the solid additional process (e.g., table), and other memory table to a solid additional process and additional process of the solid additional process of the discontent of the terms exceeded to effectively analysis the software the solid additional process of the solid additional process of the solid remaining project work in reach go the additional process the development process and development and the software the development process and development and the software and the software the development process and development and the software and the software the development process and development and the software and the software the development process and development and the software and the software the development and the terms exceeded and and the software and colored to process. Add prototware and the terms and add and and the software and the s	or Y de i i i i i i i i i i i i i i i i i i	A ana Prebability Prior 3 3 Med	yd Roeling Yr Statbo Open Open	Status Update 9/28/27.1 DBS 3461. Save expressed concerns that the A3 appears to be 9/28/27.1 DBS 3461. Save expressed concerns that the A3 appears to be 0/28/27.1 DBS 3461. Save expressed concerns that the A3 appears to be provided on the appears of the A3 appears of the A3 appears crees. DBS remain concerned that the A3 is pushing back on some support and equiry effects of the A3 appears of the A3 appears to appear the A3 appears of the A3 appears of the A3 appears appears the A3 appears of the A3 appears of the A3 appears appears of the A3 appears of the A3 appears of the A3 appears appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears the A3 appears of the A3 appears of the A3 appears of the A3 appears the A3 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A3 appears of the A3 appears of the A3 appears A4 appears of the A4 appears of the A3 appears of the A4 appears of the A4 appears A4 appears of the A3 appears of the A4 appears of the A4 appears of the A4 appears A4 appears of the A4 appears of the A4 appears of the A4 appears of the A4 appears A4 appears of the A4 appears of the	11 5 9 10 10 10 10 10 10 10 10 10 10 10 10 10	Vendor Comments
73 The planned BES infrastructure is complex Fors, Michael Finding -	10/28/021 System Design	addressed and closed.	If the local of effort to implement and passate the consciention of the BES	managed (2)/21/2123 - complete) 40 host a weekly meeting with their and Vito review all charges to the project chardes (Pmman yai CDD), (2)/11/2023 - semplete) (2)/210 host synthesis (Pmman yai CDD), (2)/210 host (Pmman yai CDD), (2)/210 host (Pmman yai CDD), Confirm current summation that a dely with the current give the self or carbot on the current give the self of the self of the charts to algo de devicement tasks and self-self of the self of the charts to algo de devicement tasks and self of the self of the charts to algo de devicement tasks and self of the self of the charts to algo de devicement tasks and the self of the self of the self of the self of the self of the self of the self of the charts to algo devicement tasks and the self of the se	9 9 9 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	2 2 1000	Open	cause downstraam impacts on UAT planning and executions. Taking, organization Classic Managemeri, and Costention I rediness to plan for any required workstravels and manual processes. IN 2172(2023). The law end of the second s	۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵ ۵	verformance data – Jur Epics tracked in lira are supporter up estimates. Velocit reporting is provided to reflect actual stat nformation. V&V remains concerned other requirements may all be delayed - Any pecific concerns Ind Recommendation believe we mentioned previoudju is line Progress". 38/10/2023
which could be difficult to implement and Rick lead to scheduly/cost impacts.		sophisticated components that make up a complex cloud infrastructure, the project can be ave to finding components that use ave the BS infrastructure and the additional clouds and time to configure, Ret, and implement the planned complex environment remain unclear.	infrastructure is not accurately eccounted for and staffed by the AB, the project cuid be may will unspected core and chinduk delays. Early, an and least for farther delays. Complex platforms often prosent system and least for farther delays. Complex platforms often prosent system infrastructure and applications challings as a system changes can hold the increased potential for system failure (i.e., due to the significant number limitanticure and applications) and definits to receive infrastructure and applications being as the system failure back. See See analysis, the more starts, Galage Complex and definits to receive infrastructure and applications are change to any system failure backanes. Google Cloud faile to clearly communicate a change that led failure in another product differing, compandio the rivial. (Ranazon Web Service, Microad) benefits of the company of the system failure backanes Google Cloud faile to clearly communicate a change that led back in product differing, compandio the rivial. (Ranazon Web Service, Microad) be difficult to receive and leads to project disruption. If this intends to ementially relaxed Mod constructing costs threads back to State employees, they could face challingse supporting tools they may not be familiae with in a complex infrastructure environmente.	(othere replate/there release), manage change, and regression text on updates are applied. The project team work to calculate any environment of the second secon	ce months Ce	2 2 100		$\label{eq:product} D(t_{1}) = 0.0000 \mbox{ thread} D(t_{2}) = 0.00000 \mbox{ thread} D(t_{2}) = 0.0000000000000000000000000000000000$	Pie you fin ann i do bei	IN/11/2023 Wasse reference. www.updates.com Inding RR3.Security Inding RR3.Security for an and Privacy which documents the work. Being done for the secure Enclave.
70 Imrificient configuration management could tead or evolpment controls and reduce the effectiveness of defect resolution	8/33/2021 Configuration and Development	The Bi & DO F Pan Deliverable, Section 3.2 establishes the framework for but configuration Mmagnet TVan, Noveen, or remains unclear if sufficient programs has been made toward establishing OV processins and governatory registry as the sum of the start and the start of the sufficient programs and the start of the start and the start of the start registry as curry the has yet to be finalized which may include additional requirements or decisions that could impact CM. The project currently relies on Github for tracking of some configurations.	ensures the BES is understood and works correctly. The BES solution	management tools. COMPLETED • Identify the DHS POC for the	45. a f	2 2 Low	Open	9/28/23-71. The AS gianed DHS approal on the times that will be tracked and monitoric as part of codinguation management. Wir requested the list last most is waiting on the AS is respond. 4(11):21-31. In material based monitorical part of codinguation management. Wir requested the list last most is waiting on the AS is respond. 4(11):21-31. In material AS is a second part of codinguation management (ML hool. They have recently performed an initial moor of Googie Codinguation management (ML hool. They have recently respondent on the AS is a second part of the AS is a second part of the Second part of Codinguation (ML hool. They have recently respondent on the AS is a second part of the AS is a control part of the AS is a control part of the AS is a second part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is a control part of the AS is	من من المن المن المن المن المن المن المن	In/11/2023 VeV requested to its last month and is separat- lease the following list of configuration in which arreful list serviceNow: incident Response Transgloon (Inversion) ServiceNow: Inversion (CMDR) NangeOnement Cessis Sequest/Ficenore ransing Sector NP/2221-Rev conving specific reviving specific reviving specific reviving specific models from the WeV team on configuration management and

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	Status	Repor	t	
Final	- Sept	ember	2023	

Image: State in the state			Finding	Identified						alyst Fi			
 		Reporter			Observation	Significance	Recommendation					Client Comments	Vendor Comments
 				7/12/2021 Testing					3 3 M	80 U			
I wash <			NISK										10/11/22
I was and the second of the	cippificant rework	•					compliance will be addressed (corrected . The ASI provider DHS/B/B/	accentance			implemented the process. It is too early to determine if advanting and using		
I was and service was and servi	againtaint remore.							acceptance.					1st recommendation
I was and the second of the second					that they are coding to some of the ADA requirements and are using a desk-	available to others. Part of the system acceptance criteria for BES is to meet	results.				numerous ADA defects that will impact project timelines or resources.		be closed as previously
I status I status I status Superside I status Superside					top tool for ADA compliance as an interim solution. IVV has not received	"all applicable State and federal policies, laws, regulations, and Standards,					8/30/2023 - ADA testing started August 1, 2023, and will continue through		mentioned based on
I was and the second					any data to demonstrate the desk-top tool results nor if it provides coverage	including without limitation the Electronic and Information Technology					February 2, 2024. The ASI developed 6 User Journeys and executed 3 tests		the feedback provided
I was a substrained with the subst					for all ADA compliance items.								
I was and the second						Act., which was verified in the ASI proposed Technical Requirements							
I was and a second se													
Image: State in the s													status be changed to
I was a						parts of Section 508 of the Americans with Disabilities Act (ADA),							"In process".
I - Note - Not													
I Marked Marke													
Image: state in the s													
 In subscription in the second state in the second sta						be a classificant amount of rework to the colution					applies stage to address any issues before formal texting heater. Until then		
 I a substant i i i i i i i i i i i i i i i i i i i						be a significant amount of rework to the solution.							the desk-top tool to
I Image: Single													
Image: Section													the IV&V has not
											identified 28 defects. However, DHS and the ASI decided to conduct ADA		contacted the
<th<< td=""><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td></td><td>development lead to</td></th<<>													development lead to
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I substant I subst													severity of this risk in
 I and a manufacture in the second of the seco													light of the following
 s - s - s - s - s - s - s - s - s - s -													reasons: a) the ATC
 Participant set and set a							partners' contacts. COMPLETED 3/31/2022 3. Define a release schedule for	x			(ICDs) are in progress, with 4 of 25 ICDs outstanding. The progress of the		schedule extension
Image: spectrum s							each interface to include milestone dates, coordination, and execution and						has made the urgency
 A base in the problem of the problem o							share with the interface partners. COMPLETED 01/04 4. Determine which				The ASI determined that some of the previously closed MDAs/MOUs may		for tackling these tasks
 A manual stands of the stands o													less than it was before
Image: Spectra							and detailed technical designs of all interfaces. COMPLETED 01/04						that started lessening
A Particular Partin Particular Particular Particular Particular Particular Parti													the schedule risk, b)
A 1 Market Ma													
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 A bis bis bis bis bis bis bis bis bis bis													
a Market Mar													
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 Name of the second secon											are pererrary 07/36/3032. The ASI and DMS are working to complete the		
 A substant is a s													progress has made
A second seco													against each of the In
2													
3 March 1 month March 2 month											of the interface technical design documents have been completed. IVV will		recommendations,
P Unclusion P Applicable P P P P P <td></td> <td>continue to monitor the ASI efforts toward addressing our</td> <td></td> <td>and it continues to</td>											continue to monitor the ASI efforts toward addressing our		and it continues to
2 Normal solution length (M) Mode Mode (M) Mod (M) Mode (M) <													trend in the right
accord mode permin driftener decisions for a drivenes per constructions for a drivene per construction for a drivenes per construction of a drivenes per													direction. In regards to
a double to all requires trabedies, respective degines, respect			I Finding -					ASAP	2 2 LC	w O			
 The stand plance discover with plance			Issue	Management									
Intance (me for DLA to for Dip 1 a lating sample day day to first op 1 a lating sample day day day to first op 1 a lating sample day day d		e,											
wand immediately where decision is project charge in grants and charges hat are offention where scattering of the indicators of these tools of the decisions. In a space Architecture grant and a long space Archi	system design, and planning decisions.												
decision bg further, the decision of the structure of of the structur												require a cri.	
In indigrating the bio indigrating the bio indigration Indigrating the bio indigration Object P1:1285 divice Day for P1:285 dir P1:285 dir P1:285 divice Day for P1:285 divice Day fo					decision log. Further, the details of the rationale for this decision or the plan	communicated can lead to confusion and rework. For example if	The Project should continue to ensure communication between				benefits). The four chapters currently under review are BI-12 Audit Sectors		architecture
communication cpliel architecture charger that could impact decisions is each area. iii 12 Projectal Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Projectal Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Projectal Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Projectal Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Projectal Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Projectal Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Projectal Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Project Architecture Charger V/L/L/2. The Add continues to work or in ieded and the dees development Example iii 12 Project Architecture Charger V/L/L/2. The Project In Intelling Transmost Architecture Charger V/L/L/2. The Project In Intelling Transmost Architecture Charger V/L/L/2. The Project In Intelling Transmost Architecture Charger V/L/L/2. The Project In Telling Transmost Architecture Charger V/L/L/2. The Project In Telling Transmost Architecture Charger V/L/L/2. The Project In Telling Transmost Architecture Charger V/L/L/2. The Project In Tel													documentation as a
devicepment taum, they may be to revolve the decisions on the prices in the prices						capabilities/features of these tools are not clearly communicated to	on possible architecture changes that could impact decisions in each area.				BI-12 Physical Architecture Chapter 8/31/23 - The ASI continues to work on		result of the BES-SSP
mer advanced pictore nave at autialise after development pictore development pictore devel						development teams, they may have to rework their designs once they realize	COMPLETE - DHS should finalize the Portal strategy and implementation				the BI-12 System Architecture Deliverable, with chapters for Common		deferral.4/23/21 rap -
enuer regular communication there end ten replace tommunication ten replace to munication ten repl						more advanced platform capabilities/features are available after	details and clearly communicate out to stakeholders and project teams.				Functions, Shared Services, System Security Plan, Audit System, and Physical		The ASI and DHS
of the project taxins to assess impacts of architecture decisions to the Project. COGED 11/30/2022 Project. COGED 11/30/20						development planning has completed.							continue to refine the
Project. CDGB 11/20/7022 CDGB 11/20/7022 CDGB 11/20/7022 CDG 4 referrant references in the response in the res													final plan for the two
montor for back at context, including disclosition to relevant in advanced statistic s											project considered changing correspondence tools from Inspire to Google		
stakadodars. The Projects making progress in surfarying kay architecture in the density file to density file stars in the							Project. CLOSED 11/30/2022						expect that final
decisions, et/24/02/320. The project is noticing they is not infring two is a computing privat not infrince in the second secon													decisions will likely be
architecture dysticks the inject and an annuanced and compared to the base management and an annuanced and compared to the state-and and an annuanced and compared to the state-and and an annuanced and the state-and and and annuanced and the state-and and annuanced and the state-and and annuanced and the state-and annual and annuanced and an annuanced and annuanced annuanced and annuanced and annuanced annuan													
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the statusider ridio, Larger Main Kursholl, Mich Jie Marine Santo Harris Marine Mari													project. The ASI refers
5/11/2023 - Med Quitz Med Quitz Reparative quitz ability of the Quitz Strategies Reparative quitz ability of Quitz Reparative quitz integration with Bills Reparative quitz													
ambighting har begin starting segment sources (e.g., NCLKA constraints) (e.g., NCLKA constraints													
Integration with BRIS, The ADplants to mark will hold David breach tailedited breach and the ADD ADD ADD ADD ADD ADD ADD ADD ADD AD													
stateholders to resulve any confusion and will include a broader MQD From our perspe audionce in functional and will include a broader MQD broad and any state of the state of the state of the state displacement of the state of													Recommendation #3.
(BESSD) collaboration efforts. 4/30/12 - No material update in the reporting are complete. If													From our perspective
													all necessary actions
period, 3/31/2023 - Tipe 49 continues to resolution for several and a several se													are complete. If the
											period. 3/31/2023 - The ASI continues to reevaluate previous infrastructure		IV&V does not believe