OFFICE OF ENTERPRISE TECHNOLOGY SERVICES

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December 18, 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 http://ets.hawaii.gov (see "Reports").

Sincerely,

Douglas Murdock (Dec 18, 2023 13:03 HST)

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: November 1 – 30, 2023

*Submitted: December **15, 2023***

PUBLIC
CONSULTING GROUP

Solutions that Matter

Overview

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Executive Summary

Executive Summary

At the end of November, the Epic Demos for Release12 have not been conducted and it is unclear whether development changes will be required based on DHS feedback. With development scheduled to end next month, IV&V is concerned that the Epic Demos may uncover functional limitations that cannot be corrected in the remaining development time.

The ASI has planned System Integration Testing (SIT) to informally start in December. DHS approval of the SIT test cases is a key component of the entry criteria for SIT. To mitigate the risk of starting SIT before development is complete and before all SIT tests are developed, the ASI would need to execute all SIT tests after both are done.

DHS and the ASI started weekly meetings with the Food and Nutrition Service (FNS) in November. This is a positive step as FNS needs to approve the Project's entry into Final Acceptance Testing (FAT) they must receive timely information on the SNAP System Integrity Review Tool (SIRT) progress and status of the Project.

IV&V opened a new project risk about implementing a Core Solution for go-live. Some BES functionality deferred to post-go-live in the last two releases may increase risks related to user adoption/buy-in and may result in workarounds. Additionally, FNS must approve the functionality in BES before the pilot. Completing the postponed scope while supporting BES in production could also result in resource challenges for both the ASI and DHS.

Sep	Oct	Nov	Category	IV&V Observations
M	M	M	Project Management	IV&V opened a new risk this month focused on the Project's intent to go live with a Core Solution. The deferral of some contractual requirements to post-go-live releases may require manual workarounds that impact user buy-in. Mitigation needs to be closely managed.

Executive Summary

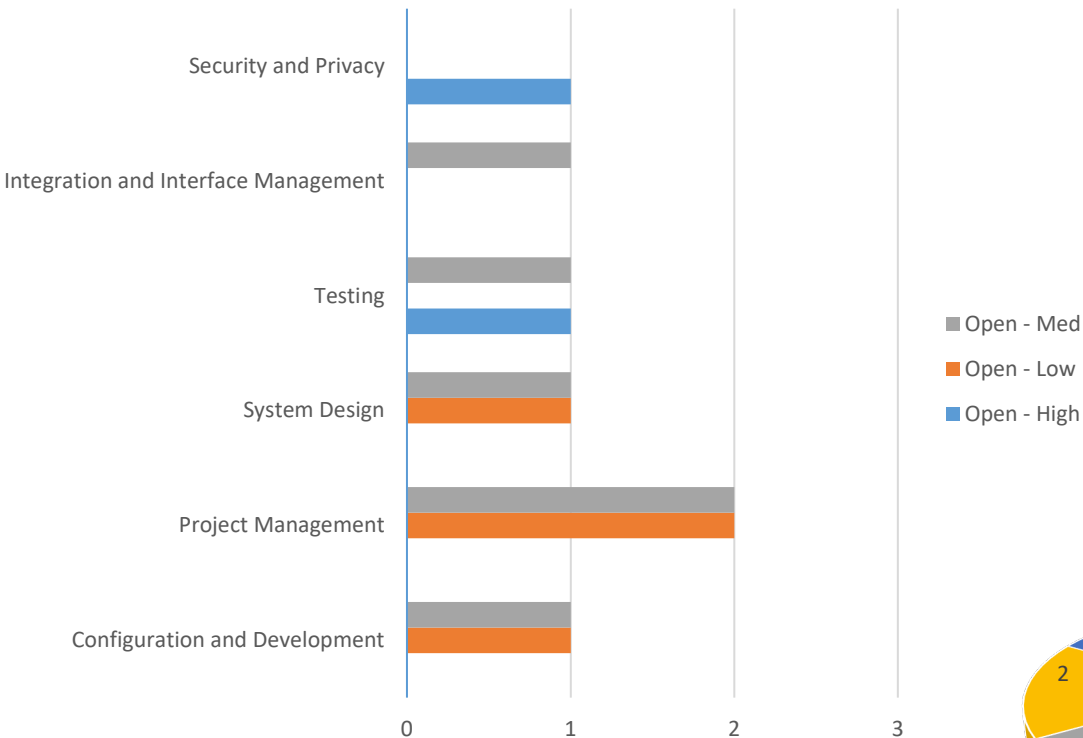| Sep	Oct	Nov	Category	IV&V Observations
(M)	(M)	(M)	System Design	The ASI has 9 Sprint and 28 Epic Demo's outstanding at the end of November 2023. This is a significant amount of BES functionality that DHS will be verifying to meet contract and design requirements. There is a risk to the project if DHS identifies defects that cannot be resolved prior to Pilot, meaning DHS will need to define workarounds until the ASI can resolve the defects in production.
(M)	(M)	(M)	Configuration and Development	Interface development delays are expected to result in an overlap of development and integration testing with the start of SIT. This is not a recommended practice but was proposed so that the start of SIT is not delayed. Interface functionality will be delivered to DHS to validate before SIT is complete.
(M)	(M)	(M)	Integration and Interface Management	The ASI communicated challenges in testing interfaces with the interface partners. They are developing an Interface Test Plan and will share it with DHS in December.
(H)	(H)	(H)	Testing	Planning continues for ASI-led SIT and DHS-led FAT. IV&V has two concerns: 1) Formal SIT starting before development is completed and 2) the training approach for new DHS FAT testers, neither of which aligns with software development best practices.
(M)	(M)	(H)	Security and Privacy	Many sections of the Security Plan are not ready for a formal review by DHS/IV&V. Specifically, the Secure Enclave design and implementation and some technical documentation are incomplete. Considering the required level of effort and limited time prior to Pilot, this is now a high risk to the project.

IV&V Findings and Recommendations

IV&V Findings and Recommendations

As of the November 2023 reporting period, PCG is tracking 12 open findings (8 risks, 4 issues) and has retired a total of 68 findings. Of the 12 open findings, 2 are High, 6 are Medium, and 4 are Low.

Open Risks & Issues

Legend:
- Open - Med
- Open - Low
- Open - High

Open Risks & Issues by Category

Legend:
- Configuration and Development
- Project Management
- System Design
- Testing
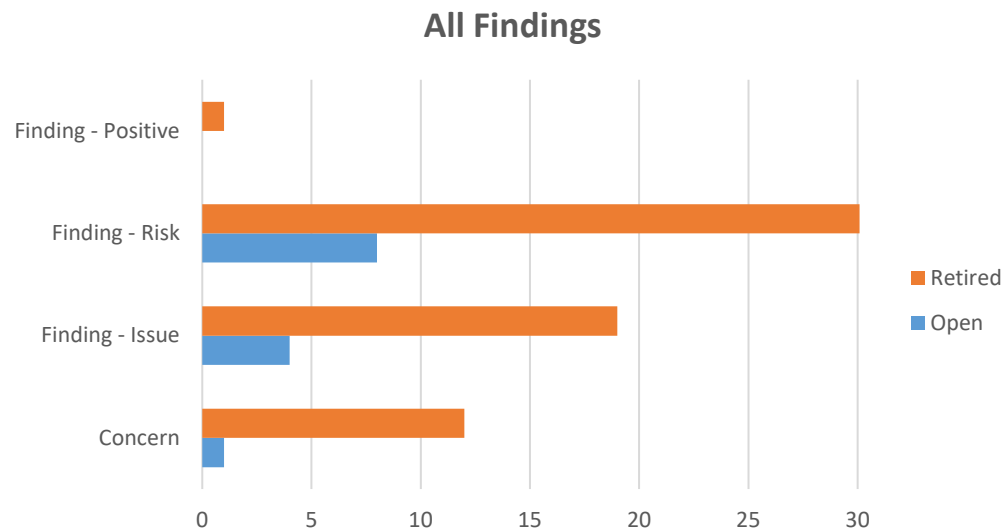- Integration and Interface Management
- Security and Privacy
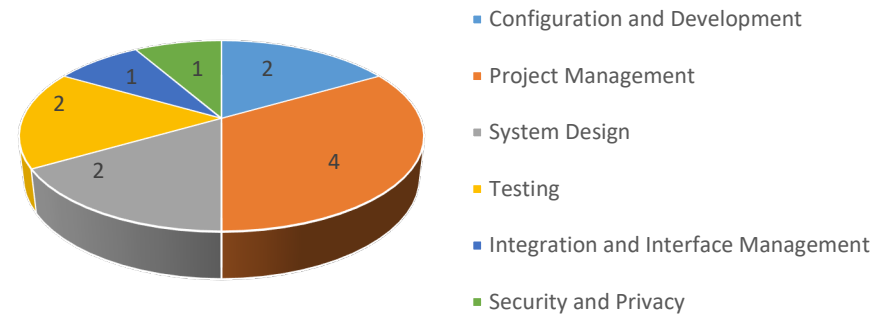
IV&V Findings and Recommendations

The following figure provides a breakdown of the 80 IV&V findings (positive, risks, issues, concerns) by status (open, retired).

All Findings

IV&V Findings and Recommendations

Findings Retired During the Reporting Period

#	Finding	Category
	None	

IV&V Findings and Recommendations

Findings Opened During the Reporting Period

#	Finding	Category
88	**Risk - Implementing a Core Solution for go-live carries inherent risks that may impact overall project success and reduce user adoption. Medium** **Observation:** The project has elected to implement a Core Solution at go-live to meet their stated timeline. This version is generally referred to in Agile software development as a Minimum Viable Product (MVP), which is a simplified version of a product that 1) offers functionality that meets the core needs of users, 2) can accelerate the timeline for go-live, and 3) allows the project to get real-world feedback from users to refine future product development. **Significance**: Introducing an MVP product entails inherent risks, such as potential challenges in securing user buy-in. This can result in limited user adoption, user dissatisfaction, and negative publicity, particularly considering the financial investment made for the delivery of limited functionality.	Project Management

Recommendations	Progress
• Increase OCM efforts to effectively manage user, general public, and legislative expectations for BES version at go-live.	In process
• Prioritize feedback from users and FNS to ensure the solution meets their core needs and so users are clear on what features they are, and are not, getting.	In process
• Actively monitor, assess, and address potential challenges throughout the development process including code quality, cutting scope to meet development milestones, insufficient user validation of demonstrated functionality, and fully defined workarounds to accommodate for the missing functionality.	In process
• DHS carefully assesses whether the advantages of a timely release outweigh the advantages of going live with a system that provides more comprehensive functionality, requires fewer workarounds, and increases user satisfaction.	In process

IV&V Findings and Recommendations

Preliminary Concerns Investigated During the Reporting Period

#	Finding	Category
84	**Preliminary Concern – The current approach to Final Acceptance Testing (FAT) may not be complete, which increases the likelihood of missed deadlines.** DHS planning for FAT has continued through November, however, there are concerns related to FAT preparation: • DHS confirmed over 60 FAT resources will be running tests, the majority without FAT/UAT experience or BES familiarity. However, as of the 11/30 schedule, there are no tasks for FAT test team training. • FAT planning is reliant on knowing the complete scope of BES functionality to be included in Go-Live. The DHS request for the complete scope of what is in and out of scope for Go-Live has not been answered. • The ASI has provided open BES Demo environments and Learning Management System modules as an aid to the DHS FAT test team, but it is unclear if this approach to training will provide an adequate understanding of BES for test case development and overall testing.	Testing

Recommendations	Progress
• Conduct comprehensive FAT planning, including what is in and out of scope for Go-Live.	In process
• DHS and ASI collaborate to define the magnitude of training support the ASI will provide for FAT.	In process

IV&V Findings and Recommendations

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.** IV&V continues to have concerns about certain architecture components that have yet to be clearly defined, and the extent to which the functionality of these components has been widely communicated. Comprehensive details about the secure enclave, disaster recovery, and time travel have yet to be broadly communicated.	L

Recommendations	Progress
• 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

IV&V Findings and Recommendations

Project Management

#	Key Findings	Criticality Rating
74	**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.** Additional development and testing sprints were added to the schedule, supporting IV&V's concern that the effort required for completing the core solution for BES continues to be under-estimated; potentially resulting in missed implementation milestones. The additional development sprints for interfaces will overlap with Integration Testing (INT) and the start of SIT in order to meet the Pilot and Go-Live dates.	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

IV&V Findings and Recommendations

Project Management

#	Key Findings	Criticality Rating
87	**Risk – The Lead Project Manager position remains vacant which may slow down the pace of the project and/or cause project delays/rework.** DHS has filled the Project Manager position with the promotion of the Assistant Project Manager. In addition, two temporary (<90 days) positions have been filled to support the BES Project and the Project Manager. DHS leadership is directly providing project management support while planning to recruit for the Assistant Project Manager position. IV&V will monitor this concern and assess the impact of these staffing changes.	L

Recommendations	Progress
• DHS works to fill the Assistant Project Manager position as soon as possible.	In Process
• DHS brings in temporary help to support the BES Project	Completed
• DHS Leadership look for ways to assist with project tasks to help with the Project Manager's workload.	In Process

IV&V Findings and Recommendations

Integration and Interface Management

#	Key Findings	Criticality Rating
63	**Issue – The lack of early planning and coordination with interface partners may result in schedule delays.** Two of the 23 MOA/MOUs (DLIR and DoTAX) are not signed and remain outstanding. DHS continues efforts to complete these agreements to minimize further impact on the project. This finding is now an issue due to the realized impact to the project. The SSA interface requires documentation to be submitted 120 days before the pilot's data usage. This SSA documentation is expected to be ready by December 15th, 107 days prior to the April 1st pilot. Although the SSA has informally stated that they can complete the review within the shorter timeframe, a risk exists to the availability of the SSA data. The interface testing team was organized in November, but planning has not begun, and meetings have not commenced. Interface testing remains unscheduled and is a growing concern as the Pilot date approaches. The ASI in internally reviewing the Interface Test Plan and will share it with DHS in December.	M

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

IV&V Findings and Recommendations

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 has yet to provide a detailed list of configuration items to DHS and IV&V. IV&V has restated this request to the ASI so that the level of detail is clear.	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

IV&V Findings and Recommendations

Configuration and Development

#	Key Findings	Criticality Rating
80	**Risk – Development delays could negatively impact the project schedule and delay go-live.** The ASI reported delays in interface design and development, and unplanned development effort required to unwind EBT functionality deferred to post-go-live due to a missing requirement for PIN issuance. Additional development sprints were added to address the delays, and these sprints resulted in a planned overlap of development and INT with SIT. IV&V remains concerned that additional development delays could require further reduction of scope and system features.	M

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

IV&V Findings and Recommendations

System Design

#	Key Findings	Criticality Rating
73	**Risk – The planned BES infrastructure is complex which could be difficult to implement and maintain and could lead to schedule/cost impacts.** Some components of the BES system infrastructure have yet to be finalized and tested, it remains unclear how or if the added complexity will impact project schedules and budgets going forward. The ASI has reported that they are close to finalizing the Secure Enclave infrastructure to house FTI data. The ASI appears to be making progress on DR plans and designs.	L

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

IV&V Findings and Recommendations

System Design

#	Key Findings	Criticality Rating
86	**Issue – Limited collaboration between the ASI and DHS in the design process could lead to BES usability issues and functionality gaps in the application and not meeting critical business needs for DHS and State clients.** As of the end of November, the ASI has nine Sprint demos to execute and all 28 Epic demos. Depending on the outcome, this could cause the ASI to extend development while testing is occurring or defer the functionality to post-Pilot, creating additional unplanned work for DHS.	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.	In Process

IV&V Findings and Recommendations

Testing

#	Key Findings	Criticality Rating
67	**Risk - The Americans With Disabilities Act (ADA) Section 508 compliance tool has not been installed timely for the Project, which may cause significant rework.** Approximately 150 ADA-related defects remained outstanding at the end of November. With minimal time remaining for development work and the possibility of more ADA defects identified as development continues, IV&V has requested reporting on; • functionality to be developed that needs to be ADA-tested • functionality developed that needs to be ADA-tested • functionality developed that has been ADA-tested The ASI has confirmed this information will be provided in the November reporting period, however, the ADA metrics for the month of November have not yet been delivered. If considerable progress is not available for DHS to verify, the risk criticality rating may increase to High in December.	M

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.	In process
• ASI/Project monitor their new ADA processes to determine if effective and can address all ADA defects prior to SIT.	Not Started

IV&V Findings and Recommendations

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.** During November, the ASI continued to create and update the SIT test cases. As reported last month, until this is completed DHS cannot evaluate the test cases for full coverage of BES functionality and provide proper sign-off to enter SIT. While these concerns are still present, the peer review process implemented by the ASI has resulted in improved quality and completeness of the test cases. There is additional concern related to the entry criteria for Release 12 SIT. SIT test cases, as part of BI-20, are scheduled for completion on 12/18 but the schedule reflects a 12/4 start date for SIT. DHS is reviewing SIT scripts as they are written, but the full magnitude of SIT test scripts will be unclear until the delivery of BI-20 on 12/18. Scope for SIT includes retests of Release 0.11 functionality and defect corrections which is part of regression testing. This should be clearly defined and specified to avoid improper entry to SIT before Release 12 development is complete. A SIT Go/No-Go decision meeting on 12/29/2023 was added to the BES Schedule. If this is the formal start to SIT, testing done before this SIT period would need to be rerun.	H

Recommendations	Progress
• 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 Entry and 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

IV&V Findings and Recommendations

Security and Privacy

#	Key Findings	Criticality Rating
82	**Risk – The lack of technical documentation may lead to incorrect implementation statements or delay the System Security Plan (SSP).** During November, the ASI and DHS Security SMEs focused on the design of the secure enclave. The Security SMEs have considered the "assured workload" service from Google for applying security controls for the secure enclave. IV&V is concerned about whether the entire system will be built and documented in time for a third-party security assessment to occur in early 2024. Considering the level of effort outstanding and time remaining before Pilot, IV&V is raising the Criticality Rating to "High.	H

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 Status

IV&V Engagement Status

IV&V Engagement Area	Sep	Oct	Nov	Comments
IV&V Budget	🟢	🟢	🟢	
IV&V Schedule	🟢	🟢	🟢	
IV&V Deliverables	🟢	🟢	🟢	PCG submitted the final October IV&V Monthly Status Report.
IV&V Staffing	🟢	🟢	🟢	Erik Torring has joined the IV&V team, assuming the responsibilities of Ryan Tan, who is departing the project.
IV&V Scope	🟢	🟢	🟢	

Engagement Status Legend		
🟢 The engagement area is within acceptable parameters.	🟡 The engagement area is somewhat outside acceptable parameters.	🔴 The engagement area poses a significant risk to the IV&V project quality and requires immediate attention.

IV&V Activities

- IV&V activities in the November reporting period:
  - Completed – October Monthly Status Report
  - Ongoing – Review the BES Project Artifacts and Deliverables
  - Ongoing – Attend BES Project meetings, (see Additional Inputs pages for details)
  - Reviewed available ASI contracts and contract amendments documentation

- Planned IV&V activities for the December 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	11/08/2023, 11/14/2023, 11/22/2023, 11/28/2023	N/A
BI-5 Project Schedule - BES 2023 DDI	11/08/2023, 11/14/2023, 11/22/2023, 11/28/2023	N/A
BI-10	11/16/2023	N/A
BI-13	11/06/2023	N/A

Additional Inputs – Artifacts

Artifact Name	Artifact Date	Version
BES 2023 Design Kanban board	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
R0.12 Epic and Sprint Demo Recordings	N/A	N/A
ADA dashboard	N/A	N/A

Additional Inputs

Meetings and/or Sessions Attended/Observed:

1. IV&V Team Meeting – 11/2/2023, 11/6/2023, 11/9/2023, 11/13/2023, 11/16/2023, 11/20/2023, 11/22/2023, 11/27/2023
2. IV&V September 2023 Pre-Draft MSR Findings Review – 11/3/2023
3. HI DHS BES September Draft IV&V Report Review –11/16/2023
4. Bi-Weekly DHS and IV&V Touch Base – 11/9/2023, 11/22/2023
5. Weekly BES Infrastructure meeting – 11/3/2023, 11/10/2023, 11/17/2023
6. DHS/IV&V Check-in – 11/14/2023, 11/28/2023
7. Weekly Client BES 2023 Project Status Meeting – 11/1/2023, 11/8/2023, 11/15/2023, 11/22/2023, 11/29/2023
8. Security Touchpoint – 11/1/2023, 11/8/2023, 11/15/2023, 11/22/2023, 11/29/2023
9. Weekly Data Conversion Workgroup – 11/16/2023
10. PMO End of Day Huddle – 11/2/2023, 11/7/2023, 11/9/2023, 11/14/2023, 11/16/2023, 11/21/2023, 11/28/2023
11. (External) Weekly Interfaces Touchpoint – 11/6/2023, 11/13/2023, 11/20/2023
12. (External) UI Standards Monthly Review - 11/1/2023
13. (External) Readiness - Working Group Meeting– 11/1/2023, 11/14/2023, 11/21/2023, 11/29/2023
14. (External) Bi-Weekly Client BES 2023 Schedule Review/Status – 11/22/2023
15. (External) BES System Security Plan – Controls - 11/7/2023, 11/21/2023
16. (External) Bi-weekly BES CCB Meeting – 11/1/2023, 11/15/2023, 11/29/2023
17. Epic 228 Absent Parents and Case Management - Sprint Demo – 11/2/2023
18. (External) BES 2023 - Test Automation Approach - Cont'd – 11/13/2023

Appendices

Appendix A – IV&V Criticality Ratings

Criticality Rating	Definition
H	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

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
PMO	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

Solutions that Matter

ID	Title	Reporter	Finding Type	Identified Date	Category	Observation	Significance	Recommendation	Event Horizon	Impact	Probability	Analyst Priority	Finding Status	Status Update	Client Comments	Vendor Comments
88	Implementing a Core Solution for go-live carries inherent risks that may impact overall project success and reduce user adoption.	Fors, Michael	Finding - Risk	11/30/2023	Project Management	The project has elected to implement a Core Solution at go-live to meet their stated timeline. This version is generally referred to in Agile software development as a Minimum Viable Product (MVP), which is a simplified version of a product that 1) offers functionality that meets the core needs of users, 2) can accelerate the timeline for go-live, and 3) allows the project to get real-world feedback from users to refine future product development.	Introducing an MVP product entails inherent risks, such as potential challenges in securing user buy-in. This can result in limited user adoption, user dissatisfaction, and negative publicity, particularly considering the financial investment made for the delivery of limited functionality. A compressed timeline may compromise the quality of designs, user interface sophistication, and lead to an uptick in software bugs and suboptimal code. Further, this approach may expose the project to regulatory compliance risks, such as last-minute objections from regulatory bodies like FNS, which could find certain system elements non-compliant with their standards and delay the go-live date. Misalignment between stakeholder expectations and MVP outcomes may lead to dissatisfaction or a lack of support for the project and could negatively impact future project funding requests. MVPs typically require the customer to implement multiple workarounds until automated features can be built into the system. Users could become impatient if these features are further delayed when bug fixes and other features take precedence. Others may lose confidence that the features or system improvements will ever be implemented. MVPs typically require an increase in OCM efforts both by the ASI and DHS staff to temper stakeholders' reactions to a system with limited functionality.	• Increase OCM efforts to effectively manage user, general public, and legislative expectations for the MVP approach. • Prioritize feedback from users and FNS to ensure the MVP meets their core needs and so users are clear on what features they are, and are not, getting in the MVP. • Actively monitor, assess, and address potential challenges throughout the MVP development process including code quality, cutting scope to meet development milestones, insufficient user validation of demonstrated functionality, and fully defined workarounds to accommodate for the missing functionality. • DHS carefully assess whether the advantages of a timely release outweigh the advantages of going live with a system that provides more comprehensive functionality, requires fewer workarounds, and increases user satisfaction.	Now	3		3 Med	Open			12/15/2023 - Above already addressed by DHS/Joe Campos.Ensure recommendations reflect "In Progress" or "In Process".
87	The departure of the BESSD lead project manager may increase risk to the project due to the bandwidth challenges for the remaining project manager.	Molina, Brad	Finding - Risk	10/31/2023	Project Management	The contracted project manager for BESSD left the BES project in September, leaving the assistant project manager responsible for managing all DHS Project Management tasks and activities. DHS has taken steps to mitigate this risk by recruiting the PM position (an offer has been extended) and hiring a temporary position to provide short-term back-office support.	The BES project is moving into a critical stage, with a level of work that requires multiple resources as planned by DHS. Key activities include: - design and development for the final release being completed - preparations for final System and User testing for all developed functionalities - preparation for operational readiness for the Pilot and State rollout of the BES solution. It is critical that the new/open positions created by DHS are filled and available for work ASAP to avoid negative impacts on the project.	OPEN - DHS works to fill the Assistant Project Manager position as soon as possible. - DHS Leadership look for ways to assist with project tasks to help with the Project Manager's workload. Completed - DHS brings in temporary help to support the BES Project	Now	2		2 Low	Open	11-30-2023 - DHS has filled the Project Manager position with the promotion of the Assistant Project Manager. In addition, two temporary (less than 90 days) positions have been filled to support the BES Project and the Project Manager. DHS leadership is directly providing project management support while planning to recruit for the Assistant Project Manager position. IVV will monitor this concern and assess the impact of these staffing changes.		
86	Limited collaboration between the ASI and DHS in the design process could lead to BES usability issues and functionality gaps in the applications and not meeting critical business needs for DHS and State clients.	Molina, Brad	Finding - Issue	8/1/2023	System Design	During the UAT process for release 11, there have been a high level of 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 defect reporting from the UAT process, a large majority of the defects are related to "design errors". Although the Release 11 UAT cycle was testing a partially build system, a significant amount of design defects was attributable to functionality developed for Release 11.	A significant amount of money and DHS resource time have been invested in the BES solution, with the expectation that the new system will at minimum provide all functionality found in current applications – but really should provide additional capabilities, greatly enhanced user interface, and overall improved usability from current systems. Should the solution fall short of expectations, there may be challenges in DHS staff adoption; lack of confidence in the solution providing the accurate information needed to provide benefits to HI citizens; reduction in ability for DHS to provide the same level of needed services to clients, resulting in bad publicity for DHS and the state.	- Include a wide enough audience in all design and demo sessions to validate 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 get early feedback on work products. - 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. - ASI and DHS re-evaluate the effectiveness of the recorded Sprint review process to ensure that designs align with DHS expectations.	Now	4		3 Med	Open	11/30/2023 - As of the end of November, the ASI has nine Sprint demos to execute and all 28 Epic demos. Depending on the outcome, this could cause the ASI to extend development while testing is occurring or defer the functionality to post-Pilot, creating additional unplanned work for DHS. 10/31/2023 - IVV notes positive progress this month in that the DHS SMEs are providing more feedback to the ASI on the BES design. The DHS PM has requested Sprint demo process updates to ensure that DHS staff who provided feedback are aware of the resolution of their comments. The ASI has also noted gaps in communication (design misunderstandings) between the ASI Business Analysts and DHS SMEs. DHS SMEs have suggested that communications would be clearer if they were included in live demos. IV&V respectfully requests that DHS and the ASI re-evaluate the Sprint Demo process as part of the overall evaluation of communication. 9/31/2023 - The DHS PMO reported that DHS SMEs have provided minimal feedback to the ASI on the four recorded Sprint demos this month. This supports IVV's concern that the new process will reduce collaboration to confirm that designs are in alignment with DHS expectations. IVV added a recommendation that the ASI and DHS re-evaluate the effectiveness of this new process. 8/31/2023 - The ASI will no longer conduct in-person Sprint Demos with DHS approval. Instead, recorded sessions will be provided to DHS with time to review. The amount of time for DHS to review the demos and the feedback process back to the ASI is undetermined. This decision to record Sprint demos without any DHS participation could limit rather than enable timely feedback and contradicts Agile methodology. IVV encourages ASI and DHS to consider this finding's recommendations to reduce miss-alignment on design that impacts development, testing, and final solution.	10/11/2023 Jessica - Our SMEs are providing their feedback. This is one of 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 wants to meet with our reviewer to validate this.	10/31/2023 - Vic - Conversations with BES PMO about live demos. Will keep as recorded demos, but we addressed JF - open comments Vic - after demo is complete, feedback and acknowledgement. Vic - for the next reporting period. We want to keep the feedback to the SME Policy and Functional SMEs. We are getting off-the-way comments. Nicole is finding comments from staff that were not involved in detail.10/11/2023 Please reference
84	The current approach to Final Acceptance Testing (FAT) may not be complete, which increases the likelihood of missed deadlines.	Torring, Erik	Concern	6/29/2023	Testing	Although there is an approved UAT plan and an experienced testing team, the Project appears unprepared for Release 11 UAT. For example, new testing processes, including a Teams Issue Tracker, are not fully developed. While basic workflow understanding exists, test team members raised many questions about testing processes, and some scenarios and defect flows remain undefined. The Project team reported they will refine these processes during UAT.	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 not fall within the critical path of the project, and a delayed completion or incomplete UAT does not directly impact the overall project schedule. While the immediate schedule implications of incomplete or delayed R11 UAT may be limited, it is important to consider the potential long-term consequences regarding project quality, capacity, and resource retention.	OPEN - Conduct comprehensive Final User Acceptance Testing (FAT) planning, including what is in and out of scope for Go-Live. - DHS and ASI collaborate to define the magnitude of training support the ASI will provide for FAT COMPLETED - Conduct lessons learned session to incorporate into FAT, including updates of all processes, procedures, roles and responsibilities (9/3102023) - Develop contingency plans if Release 11.1 UAT does not proceed as planned. (9/31/2023)	UAT/FAT	3		1 High	Open	11/30/2023 - DHS planning for FAT has continued through November, however, there are concerns related to FAT preparation: DHS confirmed over 60 FAT resources will be running tests, the majority without FAT/UAT experience or BES familiarity. However, as of the 11/30 schedule, there are no tasks for FAT test team training. FAT planning is reliant on knowing the complete scope of BES functionality to be included in Go-Live. The DHS request for the complete scope of what is in and out of scope for Go-Live has not been answered. The ASI has provided open BES Demo environments and Learning Management System modules as an aid to the DHS FAT test team, but it is unclear if this approach to training will provide an adequate understanding of BES for test case development and overall testing. 10/31/2023 - DHS is planning for FAT, scheduled to begin in February 2024. DHS plans to initiate test case development in early November 2023 and plans to finalize the list of staff who will perform FAT by early November to involve them in the planning sessions from the very beginning. However, FAT planning is reliant on knowing the complete scope of BES functionality to be included in Go-Live. This is a DHS request to the ASI that is yet to be answered. The ASI is also planning to conduct the full system and integration testing prior to the start of FAT. The ASI has repeatedly stated they are performing full testing of all functionality to include live tests for the integrations between the BES modules and Interface Partners. This testing is critical to the ability of the DHS test team to effectively test the system from a user perspective. 9/30/2023 - The Project completed R11.1 UAT, however, some UAT processes still have not been well defined. For example, there was confusion if UAT testers needed 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		12/15/2023 - Weekly FAT Planning Meetings have been occurring since early November. There are current FAT team preparation items on the schedule (per below), but it may not fully represent all the detailed items discussed and tracked on the FAT Planning Meeting. 11/17/2023 - The complete scope of BES functionality is being tracked in Jira/Confluence. Please provide more details on the request made by DHS that is yet to be answered. 10/31/2023 - Plan to have a Release 12 planning meetings when Trisha gets back.
83	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.	Torring, Erik	Finding - Issue	6/2/2023	Testing	After examining the Project's R11 QA Dashboards, R11 Traceability Dashboards, and Test Repository, gaps in testing coverage may exist and 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 commences System Integration Testing (SIT). The ASI plans to complete the INT exit criteria by June 16, 2023, about 2 weeks before SIT begins.	Identifying defects early is vital for effective testing, as it is more efficient and cost-effective to address issues during the early testing stages. If there is slow progress or incomplete testing in the early stages, it can result in more defects leaking into subsequent testing phases, necessitating more extensive and rigorous testing efforts. Insufficient testing coverage or slower than-anticipated progress throughout the project lifecycle increases the risk of encountering significant delays, extensions, or the introduction of defects into the production environment during the final testing stage, known as Final Acceptance Testing (FAT).	OPEN The 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. - DHS and ASI monitor INT/SIT closely for both breadth and depth of testing to ensure the test system is adequately tested. - The Project team reviews the SIT exit criteria and revises them as needed to ensure UAT/FAT begins with the best system possible.	UAT	4		4 High	Open	11/30/2023 - During November, the ASI continued to create and update the SIT test cases. As reported last month, until this is completed DHS cannot evaluate the test cases for full coverage of BES functionality and provide proper sign-off to enter SIT. While these concerns are still present, the peer review process implemented by the ASI has resulted in improved quality and completeness of the test cases. There is additional concern related to the entry criteria for Release 12 SIT. SIT test cases, as part of BI-20, are scheduled for completion on 12/18 but the timeline reflects a 12/4 start date for SIT. DHS is reviewing SIT scripts as they are written, but the full magnitude of SIT test scripts will be unclear until the delivery of BI-20 on 12/18. Scope for SIT includes retests of Release 0.11 functionality and defect corrections which is part of regression testing. This should be clearly defined and specified to avoid improper entry to SIT before Release 12 development is complete. A SIT Go/No-Go decision meeting on 12/29/2023 was added to the BES Schedule. If this is the formal start to SIT, testing done before this SIT period would need to be rerun. 10/31/2023 - The ASI continues to update the System Integration Testing (SIT) process and test cases. Until this is completed by the ASI, DHS cannot verify that the SIT test cases are comprehensive and fully test all BES functionality (including integrations, interfaces, and converted data). 9/31/2023 - 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; 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		12/15/2023 - The SIT that started on 12/4 is internal to eWorldES and not the official SIT start in January. The SIT that started is eWorldES internal testing to ensure already delivered functionality is working appropriately. 10/31/2023 - Vic - For R12, DHS will be able to evaluate SIT test scripts in Jira. FAT planning meeting when Trisha is back. SIT entrance criteria as well in these meetings. Vic - overlap of INT and SIT. Testing Will be testing everything that was previously done in prior releases.

ID	Title	Reporter	Finding Type	Identified Date	Category	Observation	Significance	Recommendation	Event Horizon	Impact	Probability	Analyst Priority	Finding Status	Status Update	Client Comments	Vendor Comments
82	The lack of technical documentation may lead to incorrect implementation statements or delay the System Security Plan	Heath, Dustin	Finding - Risk	4/27/2023	Security and Privacy	In April, the ASI/DHS system security plan (SSP) authors began writing implementation statements. Currently, the technical documentation supporting the SSP is unavailable, outdated, or in a draft form. During April, decisions on what tools support the SSP controls are still being decided on. Implementation statements are currently being written from the perspective of how the system should be designed from the SSP author's perspective instead of how the system is actually designed. The SSP authors need to know and use documentation such as System Architecture and Design, network topology, dataflow, ports and protocols, tools used for logging, etc.	Once the system architecture and design have been completed, the SSP authors may need to edit or rewrite implementation statements. A full draft of the SSP is scheduled to be published August 15th , 2023, and the final SSP (ready for federal partner review) is scheduled for September 15, 2023. The SSP is a large technical document with hundreds of controls and control enhancements, and each one requires an implementation statement of how the control or enhancement has been met.	- Determine when the infrastructure design baseline will be completed. - In Progress - Determine when documentation will be created, updated, and available. - In Progress - Collaborate and communicate with SSP authors about when reliable and correct documentation will be available. - In Progress - 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	December 15th, 2023 when the full SSP is scheduled for completion and approval prior to sharing with Federal partners..	4		4 High	Open	11/30/2023 – During November, the ASI and DHS Security SMEs focused on the design of the secure enclave. The Security SMEs have considered on the design of the secure enclave. The Security SMEs have considered the "assured workload" service from Google for applying security controls for the secure enclave. IV&V is concerned about whether the entire system will be built and documented in time for a third-party security assessment to occur in early 2024. Considering the level of effort outstanding and time remaining before Pilot, IV&V is raising the Criticality Rating to "High. 10/26/2023 – Throughout the month of October, both the ASI and DHS Security SMEs have focused on the design of the secure enclave (to store federal tax information and other sensitive data). A significant amount of work remains for both the System Security Plan and the development of required artifacts for the secure enclave that are planned to be complete by the end of November 2023. And much of this work requires a logical approach in that certain activities must be completed prior to the start of follow-on activities. • The secure enclave is in the design phase. • The Security SMEs are writing over twenty (20) policies and procedures that will be artifacts to the System Security Plan (SSP), planned to be completed by the end of November 2023. • There are over twelve (12) additional documents, including documented plans to support the SSP and required submissions to federal regulators, most of these documents are planned to be completed by the end of November 2023. The ESI and ASI have stated they are confident the work can be completed on-time. 9/28/2023 – 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		12/15/2023 - Security: Executive Summary: The design and implementation of the Secure Enclave (BI-12) is being commingled with the System Security Plan (BI-13). The purpose of the security plan is to describe the controls in scope (for BES and Secure Enclave) and describe the current state of implementation. Further, the SSP is (by design) a living document that will be periodically revised to reflect changes in the implementation status (progress and maturation of security capabilities). The SSP is complete,
80	Development delays could negatively impact the project schedule and delay go-live.	Fors, Michael	Finding - Risk	6/30/2022	Configuration and Development	ASI had previously reported development activities have been slowed as they have been unable to achieve and/or maintain their expected development velocity. Previously, the development team was challenged with accurately estimating development task level of effort (i.e., story points) and the project has been challenged with producing a project schedule that accurately reflects realistic timelines (see Finding #74). The ASI continues to be challenged with finding qualified resources in a timely manner.	If the ASI is unable to achieve a velocity that enables them to meet planned milestones, schedule delays may lead to a delayed system go-live date. Failure to achieve a level of accuracy in estimating development tasks could lead to a project schedule that is flawed and unrealistic. Previously, DHS had indicated, and IVV agreed, that some of these delays were due to some ASI BAs lacking the expertise required to create optimal designs and system specifications that developers could consume without requiring extensive clarification from the ASI BA/SA team. DHS and IVV observed instances where ASI BAs/SAs have presented less than optimal designs and left it to DHS (who may lack software or UI design expertise) to improve, which has contributed to unproductive design sessions (see Finding #61). It remains unclear if scope creep has contributed to these delays.	OPEN • DHS request the ASI strategically add the right project team resources to effectively increase velocity. Note that adding additional junior development, analysis, and other resources that can lead and mentor junior resources. • Request the 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. • ASI provide DHS with the time needed to effectively evaluate the software demonstrations (demos) and elicit productive design discussions with DHS attendees during each demo. • ASI regularly report estimated story points for the total remaining project work to reach go-live and presents a dynamic burn-down chart to track the progress. COMPLETE CLOSED • ASI reviews the development process and identifies and mitigates the challenges preventing them from incorporating Epic demo activities into the project schedule. (9/29/23 - ASI will not be doing this, with DHS approval)	Immediate	3		3 Med	Open	11/30/23 – The ASI reported delays in interface design and development, and unplanned development effort required to unwind EBT functionality deferred to post-go-live due to a missing requirement for PIN issuance. Additional development sprints were added to address the delays, and these sprints resulted in a planned overlap of development and INT with SIT. IVV remains concerned that additional development delays could require further reduction of scope and system features. 10/25/23 - The ASI has noted gaps in communication (design misunderstandings) between ASI BAs and DHS SMEs; DHS project management is working with the ASI to determine the best way to address this. The DHS SMEs have suggested that design decisions/communications would be more productive if more than a few SMEs were included in the live demos. If these communication challenges continue, it could lead to development delays. While the ASI added 5 developers to focus on ADA defects, it remains unclear if addressing ADA requirements will incur further development delays. 9/28/23 - DHS SMEs have expressed concerns that the ASI appears to be cutting corners in order to increase their development velocity and meet development milestones. Though the project has elected to minimize scope creep, SMEs remain concerned that the ASI is pushing back on some important design refinements. They have noted that the Projects decision to record demos instead of having live collaboration sessions with SMEs could hinder good design and slow the design feedback loop. If critical refinements are discovered late into the development lifecycle, it may necessitate last-minute revisions and could potentially result in schedule delays. Alternatively, if the project elects to go-live with a system that falls short of users expectations, user buy-in may prove to be a challenge. The ASI continues to identify functionality and scope that they would like to defer to post go-live. It remains unclear if this is due to development delays or the		10/31/2023 - Vic - mixed bag here. We are mentioning design misunderstandings. MF - improve the design communications. Rama - I am trying to understand what development delays, two months left in DDI. Vic - we will evaluate the draft.
74	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.	Molina, Brad	Finding - Issue	11/29/2021	Project Management	DHS and the ASI have tried multiple times to rework the schedule with results that have not yielded improvement. Concerns with the structure, estimating practices, and ability to manage to the schedule persist. The use of multiple tools to track resources obfuscate resource management. Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were addressed and closed.	If estimates for project schedule activities are not accurate, this can lead to constant schedule changes, resources not being available when needed, rushed activities, and general frustration which can lead to schedule delays, low quality output, scope changes, and budget issues.	OPEN Monitor, evaluate and revise scheduling estimates for accuracy. ASI plan and execute Epic development so that Epic demos can occur earlier in the release schedule and allow time for possible revisions. ASI provide details on how Velocity measures were used to develop estimations for development effort in new version of DDI schedule COMPLETE DHS and the ASI agree to a revised schedule against which project deliverables can be managed. (2/28/2023 - complete) ASI host a weekly meeting with DHS and IVV to review all changes to the project schedules (Primary and DDI). (8/31/2023-complete) CLOSED As requested by DHS, add key milestones to the project schedule, such as Sprint and Epic demos, to show key progress towards completion of Epics. (9/29/23 ASI says that they will not do this. Confirm current assumption that a delay with the current go-live date will not result in major implications. (6/29/23) Leverage velocity and burn down charts to adjust development tasks estimates if needed. Leverage velocity and burn down charts to adjust development tasks estimates if needed. (4/30/2023 - ASI using Jira) Using the available tools, review the current estimates to complete each activity compared to past actual hours (1/31/2023 - new ASI - Not Started) Update as necessary and provide the DHS/ASI Project Managers with reports and data that accurately reflect the DHS/ASI resource needs along with over/under allocations of staff for the duration of the Project (1/31/2023 - new ASI - Not Started) Develop mitigation and contingency plans that are tracked/managed by DHS/ASI for all tasks that are behind schedule or are at risk of being behind schedule which includes resource management. (1/28/2023 - new ASI) Discuss, validate and address additional concerns within the project processes that may cause the project delays other than inaccurate estimates such as over reliance on POs, slow design sprints, and cadence of development teams. (2/28/2023 - new ASI) The new ASI presents a draft schedule for DHS	Immediate	4		2 Med	Open	11/30/2023 - Additional development and testing sprints were added to the schedule, supporting IVV's concern that the effort required for completing the core solution for BES continues to be under-estimated; potentially resulting in missed implementation milestones. The additional development sprints for interfaces will overlap with Integration Testing (INT) and the start of SIT in order to meet the Pilot and Go-Live dates. 10/31/2023 - The BES project schedule continues to have significant revisions after being re-baselined, including delays to tasks (a training task was delayed over a hundred days due to schedule refinement). IVV continues to monitor the schedule for possible estimation issues that could introduce risk in meeting key milestones of the project. 9/31/2023 - 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. 8/31/2023 - The 8-week implementation delay provides the project team with additional time to develop and test the planned Release 12 functionality, including work that was moved from Release 11. Addressing IVV recommendations for this finding could further remediate risk to the project schedule. 7/31/2023 - The ASI has not provided justification for reducing development and testing efforts in the schedule for Release 12 as requested by DHS and IVV. Additionally, IVV is concerned about ASI delays in providing a BES project schedule to DHS that reflects major revisions to Release 12 as reported by the ASI. IVV will continue to monitor the new		11/17/2023 - As mentioned in our pre-meet, the only significant revisions made to the schedules were with the refinement of training dates. I also mention dates will continue to evolve as we progress further into the project phases. Please consider "softening" your status verbiage. 10/31/2023 Vic - Significant revisions, what are you concerned about? Brad - big swings in the schedule. Training. Vic - Training - Tony has been working to refine dates. As we know more it is
73	The planned BES infrastructure is complex which could be difficult to implement and lead to schedule/cost impacts.	Fors, Michael	Finding - Risk	10/28/2021	System Design	Current ASI infrastructure plans include a significant number of sophisticated components that make up a complex cloud infrastructure. Further, the Project Team has yet to finalize components that will make up the BES infrastructure and the additional costs and time to configure, test, and implement the planned complex environment remain unclear.	If the level of effort to implement and manage the complexities of the BES infrastructure is not accurately accounted for and staffed by the ASI, the project could be met with unexpected costs and schedule delays. Delays in finalizing the components being implemented could exacerbate this risks and lead to further delays. Complex platforms often present system maintenance and operations challenges as system changes can hold the increased potential for system failure (i.e., due to the significant number of "moving parts") and increase the level of time and effort to resolve infrastructure and application-level bugs. Further, some components remain in an immature state compared to their legacy counterparts. For example, the project recently experienced a system failure because Google Cloud failed to clearly communicate a change that led to failure in another component (i.e., Nexus). Google Cloud is generally viewed as a less mature product offering, compared to their rivals (Amazon Web Services, Microsoft Azure). IV&V remains concerned that this could lead to failures at critical points in the project (including post-go live production failures) that could be difficult to resolve and lead to project disruption. If DHS intends to eventually reduce M&O outsourcing costs turning over M&O tasks to State employees, they could face challenges supporting tools they may not be familiar with in a complex infrastructure environment.	• 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. • The project team work to establish strong governance over the utilization and maintenance of the various system tools/components. • ASI allot time in the schedule to conduct proof of concepts to assure infrastructure components work as expected. • ASI maintain a detailed schedule for DevOps implementation tasks to avoid unexpected delays that could delay project milestones and the critical path.	Next several months	2		2 Low	Open	11/30/2023 - Some components of the BES system infrastructure have yet to be finalized and tested, it remains unclear how or if the added complexity will impact project schedules and budgets going forward. The ASI has reported they are close to finalizing the Secure Enclave infrastructure to house FTI data. The ASI appears to be making progress on DR plans and designs. 10/30/23 - The ASI continues to have productive discussions with DHS during their weekly Architecture calls. The ASI has yet to finalize their plans and technical architecture for conducting Disaster Recovery (DR). The cloud technology being implemented offers some benefit and can simplify some elements of DR. However, it remains unclear if the complex infrastructure (with the multitude of components being employed) will impact their ability to test and perform DR. 9/28/23 - 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. IVV 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). 8/31/23 - The ASI has reported progress in the build out of Chronicle, their event logging tool. The weekly Architecture/Infrastructure coordination meeting appear to be productive, and the ASI reports that no additional changes are planned for the BES Infrastructure. IVV will continue to monitor this finding and look for ASI progress in addressing the recommendations.		11/17/2023 - Again, why is DR being referenced here? Per the current project schedule, the DR plan is scheduled to be submitted at the end of the year. Reminder: Pilot Go-Live is April 2024. 10/31/2023 - Vic - westill do notunderstand why this remains. 10/11/2023 Please reference your updates on finding #82 Security and Privacy which documents the work being done for the Secure Enclave.

ID	Title	Reporter	Finding Type	Identified Date	Category	Observation	Significance	Recommendation	Event Horizon	Impact	Probability	Analyst Priority	Finding Status	Status Update	Client Comments	Vendor Comments
70	Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution	Fors, Michael	Finding - Risk	8/23/2021	Configuration and Development	The BI-6 DDI Plan Deliverable, Section 5.2 establishes the framework for the Configuration Management Plan, however, it remains unclear if sufficient progress has been made toward establishing CM processes and governance, selecting CM tools (e.g., CMDB), and building out the CM infrastructure. The project's Security Plan 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.	Configuration Management is a set of processes and procedures that ensures the BES is understood and works correctly. The BES solution includes tools that may provide a level of automation for Configuration Management that may reduce errors and should provide the project team with accurate, dynamic and timely information on some of the configuration items. However, it is critical that DHS/ASI agree to the full list of items that are included in the configuration plan along with the details regarding the management of the configuration items, reporting and audit features.	OPEN • 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. • ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track. • DHS and ASI work to clarify/solidify plans for the potential use of configuration management tools. COMPLETED • Identify the DHS POC for the Configuration Management Activities that would provide oversight of configuration management activities and assure defined CM steps and plans are being followed, are effective, and are achieving DHS objectives for CM. 7/31/2022	ASAP	2	2	Low	Open	11/30/23 - The ASI has yet to provide a detailed list of configuration items to DHS and IVV. IVV has restated this request to the ASI so that the level of detail is clear. 10/26/23 - The ASI provided broad information on the configuration items being tracked but have yet to provide detailed configuration items for IVV review. The ASI has deprioritized some configuration management activities, which it intends to perform in preparation for Maintenance and Operation (M and O). 9/28/23 - The ASI gained DHS' approval on the items that will be tracked and monitored as part of configuration management. IVV requested the list last month and is waiting on the ASI to respond. 8/31/23 - No material update. 7/31/23 - No material update. 6/30/23 - No material update. 5/31/2023 - The ASI continues to make progress with its utilization of the ServiceNow Configuration Management (CM) tool. They have recently performed an initial import of Google Cloud Platform server details into the ServiceNow Configuration Management Database. *** Continued work. Setup in ServiceNow, will be building up instances. Ongoing support and main. Dont' think still a risk, IVV to discuss. 4/30/2023 - The ASI finalized the ServiceNow (SN) modules they will utilize for the project. 3/31/2023 - The ASI is currently evaluating which Service Now (SN) modules will be the best fit for the project and for DHS going forward. Details of exactly how they'll be using SN and the level of configuration management they intend to perform has yet to be determined. 2/28/2023 - The new ASI intends to utilize ServiceNow (SN) for most configuration management tracking. Details of exactly how they'll be using SN and its multitude of modules and capabilities remain unclear. 1/31/2023 - Activity in the reporting period concentrated on project restart tasks, and IVV will reassess this finding once related project activity has begun. 12/31/2022 - No material update in the reporting period as the work stoppage continued and the new ASI conducted		10/31/2023 - Vic - We provided a listing, working on a plan to implement. MF - Broad categories Vic - we are working on the details now. This will become more important and we work to get ahead of the M&O plan. 10/11/2023 IV/V requested the list last month and is waiting on the ASI to respond - Please see the following list of configuration management items which are/will be managed in ServiceNow: Incident Response Change/Configuration Management
67	The Americans With Disabilities Act (ADA) Section 508 compliance tool has not been installed timely for the Project, which may cause significant rework.	Torring, Erik	Finding - Risk	7/12/2021	Testing	While R0.3 and R0.4 reported that Section 508 compliance had been successfully completed the ASI confirmed that there is currently no working tool installed and that Section 508 compliance testing has not been performed. This risk has been discussed with the ASI over the past several months, but there have been evidence of results to-date. The ASI did state that they are coding to some of the ADA requirements and are using a desk-top tool for ADA compliance as an interim solution. IVV has not received any data to demonstrate the desk-top tool results nor if it provides coverage for all ADA compliance items.	There is a contractual obligation and requirement for BES to be ADA compliant to obtain State and Federal funds for the development of the BES. The ADA Section 508 intent is to make electronic and information technology accessible to people with disabilities (e.g., color blindness, vision and hearing disabilities), in a way that is comparable to the access available to others. Part of the system acceptance criteria for BES is to meet "all applicable State and federal policies, laws, regulations, and Standards, including without limitation the Electronic and Information Technology Accessibility Standards associated with Section 508 of the Rehabilitation Act., which was verified in the ASI proposed Technical Requirements Approach that states "The system complies with DHS branding standards as defined by DHS and adheres to W3C level 2 accessibility guidelines, sub-parts of Section 508 of the Americans with Disabilities Act (ADA), nondiscrimination safeguards in 45 CFR 85.". If the Hawaii guidelines (https://www.hawaii.edu/access/uh-guidelines-for-accessibility/), FNS Guidelines from the 901 Handbook, and functional obligations to adhere to the Section 508 compliance guidelines (https://section508.gov/) there may be a significant amount of rework to the solution.	- The ADA tool meets contractual and project requirements. (Complete) - The ASI communicates how the tool will be used to report compliance and non-compliance and how non-compliance will be addressed/corrected. (Complete) - The ASI provides DHS/IV&V reports from the ADA tool execution and explain how to interpret the results. (Complete)	As soon as possible and prior to final solution acceptance.	3	3	Med	Open	11/30/2023 - Approximately 150 ADA-related defects remained outstanding at the end of November. With minimal time remaining for development work and the possibility of more ADA defects identified as development continues, IV&V has requested reporting on; - functionality to be developed that needs to be ADA-tested - functionality developed that needs to be ADA-tested - functionality developed that has been ADA-tested The ASI has confirmed this information will be provided in the November reporting period, however, the ADA metrics for the month of November have not yet been delivered. If considerable progress is not available for DHS to verify, the risk criticality rating may increase to High in December. 10/31/2023 - The ADA compliance tool was installed in August 2023 and uncovered approximately 300 ADA-related defects. About 200 defects remained open at the end of October. Considering the high number of defects and minimal time remaining for development work, the ASI reevaluated ADA processes for efficiencies and improved preventative measures. As a result, the ASI plans to use the Usablenet browser extension to find ADA defects in real time during development. The ASI will address these defects during development to minimize the number of ADA defects released into subsequent testing environments. Additionally, the ASI will dedicate 5 ADA-focused developers and a Scrum master to address the existing ADA defects and anticipates having sufficient time to address the defects without impacting the Project. 9/30/2023 - 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 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. 8/30/2023 - ADA testing started August 1, 2023, and		10/31/2023 - Rama - Trip to India set up a dedicated ADA team. Dev extension for developers to use to check code. Team brought in bugs, examined every screen 5 developers and scrum master. New branch of updates, will bring into build pipeline. New developers are validating as-built, old developers are using plug-in to check their code when submitting. Viv - This week's status report had process improvements. Rama - We are confident that we can fix all of the defects
63	The lack of early planning and coordination with interface partners may result in schedule delays.	Reynolds, Mark	Finding - Issue	1/21/2021	Integration and Interface Management	The following planning and execution items have not yet been addressed and documented by the ASI.- Connectivity is planned to utilize a presently undefined ETS API Gateway; however, there is no evidence that details have been determined or documented in this regard.- There is little evidence of active and sufficient communication with interface partners for coordination, design, and testing activities (Unit Test, SIT, UAT).- Interface planning and execution tasks and activities, including those for interface partners, are neither resident nor managed within the Project Schedule.	DDI project often underestimate the time needed to effectively manage all the tasks and activities to successfully implement data sharing. A clearly defined communication plan and schedule that includes the coordination, planning, and execution activities along with milestone dates can minimize the risk of potential delays. In addition, after planning has been completed, interface partners will have to be available during interface implementation to ensure that the interfaces are properly developed and tested before deploying the system to production.	OPEN 5. Complete all MOAs and obtain formal approvals. 6. Confirm testing dates with interface partners in writing. 7. 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. 8. ASI and DHS conduct a root cause analysis to determine the reason FDDs were changed without DHS knowledge. COMPLETE 1. Establish a communication plan for each interface partner for the duration of the BES DDI activities. COMPLETED 10/29 2. Identify and document all interface partners' contacts. COMPLETED 3/31/2022 3. Define a release schedule for each interface to include milestone dates, coordination, and execution and share with the interface partners. COMPLETED 01/04 4. Determine which deliverable will include the details associated with the planned connectivity and detailed technical designs of all interfaces. COMPLETED 01/04	Q3 2023	4	2	Med	Open	11-30-2023 - Two of the 23 MOA/MOUs (DLIR and DoTAX) are not signed and remain outstanding. DHS continues efforts to complete these agreements to minimize further impact on the project. This finding is now an issue due to the realized impact to the project. The SSA interface requires documentation to be submitted 120 days before the pilot's data usage. This SSA documentation is expected to be ready by December 15th, 107 days prior to the April 1st pilot. Although the SSA has informally stated that they can complete the review within the shorter timeframe, a risk exists to the availability of the SSA data. The interface testing team was organized in November, but planning has not begun and meetings have not commenced. Interface testing remains unscheduled and is a growing concern as the Pilot date approaches. The ASI is internally reviewing the Interface Test Plan and will share it with DHS in December. 10-26-2023 - Two out of 23 MOA/MOU are outstanding; the ASI is reporting an agreement was reached with DLIR and it is ready for signature; the DoTAX MOU does have some challenges and is currently being addressed by the ASI and DHS. The Functional Design of all 23 Interfaces was completed and approved by DHS. 09-29-2023 - Nine of the twenty-three Interface Control Documents were completed, reviewed, and approved by DHS. The Memorandums of Agreement and the Memorandums of Understanding (MOAs and MOUs) are being reviewed. 7 of 28 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. IVV will continue to monitor MOA and MOU items. 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		10/31/2023 - Good and accurate as of the end of October. Met with DoTAX (Cory) to get appendix details. Sent to Scott M. to finalize updates, then send to AG. DoTAX is one of the interfaces that will overlap SIT. They are busy in the tax season. Vic - Rama has updates. Pushback from OIT about sample files. Rama - set up a batch team for end-to-end coverage. We met with Ryan S. and OIT about sample files. We asked for masked PROD files for ease of use. OIT said no. We are creating a batch
29	Uncertainty and/or a lack of communication around long-term architecture decisions could impact the project budget, schedule, system design, and planning decisions.	Fors, Michael	Finding - Issue	5/28/2019	Project Management	Throughout the last several years since project initiation, platform and BES system architecture decisions have not always been clearly communicated and socialized to all relevant project stakeholders. For example, the ASI and DHS had not broadly communicated their decision implementing two Siebel instances (one for KOLEA, one for BES) in a timely manner, and the decision was not immediately reflected in the project change log or the project decision log. Further, the details of the rationale for this decision or the plan for integrating the two instances were not immediately and/or broadly communicated.	The current project architecture and design should be as representative and inclusive of all known future solution plans as soon as details become available. These architecture plans and future state designs and capabilities should be thoroughly vetted by a broad base of relevant stakeholders and available experts and broadly communicated to relevant stakeholders as soon as possible. Architecture plans and changes that are not effectively communicated can lead to confusion and rework. For example, if infrastructure tools, governance for these tools, and important capabilities/features of these tools are not clearly communicated to development teams, they may have to rework their designs once they realize more advanced platform capabilities/features are available after development planning has completed.	OPEN - The ASI continue to make updates to the BI-12 System Architecture Deliverable with additional details as they become available and with any finalized architectural changes - 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 to assure a common understanding of the implications of these decisions. - 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. COMPLETE - DHS should finalize the Portal strategy and implementation details and clearly communicate out to stakeholders and project teams. Complete 3/31 CLOSED - Maintain current communication processes to ensure regular communication between the Architecture Team and the rest of the project team to assess impacts of architecture decisions to the Project. CLOSED 11/30/2022	ASAP	2	2	Low	Open	11/30/23 - IVV continues to have concerns about certain architecture components that have yet to be clearly defined, and the extent to which the functionality of these components has been widely communicated. Comprehensive details about the secure enclave, disaster recovery, and time travel have yet to be broadly communicated. 10/26/23 - The ASI completed another iteration of the BI-12 System Architecture Deliverable, however, some elements of their architecture may not have been fully described. For example, details of the secure enclave and the disaster recovery infrastructure have yet to be described and/or communicated broadly. IVV will continue to monitor this finding throughout implementation to assure new components and changes to existing components are thoroughly vetted and communicated to stakeholders. 9/28/23 - The ASI updated and delivered four chapters of the BI-12 System Architecture Deliverable, currently under DHS/IVV review. If DHS agrees to postpone the 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 BI-12 Audit System Chapter BI-12 BES Shared Services Chapter BI-12 Self-Service Portal Chapter BI-12 Physical Architecture Chapter 8/31/23 - The ASI continues to work on the BI-12 System Architecture Deliverable, with chapters for Common Functions, Shared Services, System Security Plan, Audit System, and Physical Architecture currently under internal review. DHS and IVV are expected to receive these chapters for review in the month of September. 7/31/23 - The project considered changing correspondence tools from Inspire to Google ADDocs but recently decided to stay with Inspire. IVV will continue to monitor for broad communication of architectural/tool decisions to relevant	06/30/2020 - Combined application is still planned. App still not finalized by DHS. From Arch perspective, we are building in Liferay. Future Integration of the portals is still to be determined, but is not more complex than originally planned for data sharing. If change is made to Adobe, this would require a CR.	11/17/2023 - Both the Secure Enclave and DR Infrastructure are works in progress. Why does IV&V continue to report items that are in progress work? Where do you draw the line? 10/11/23 Vic - Per our discussion with Joe, Rama mentioned there will not be a need to make changes to the architecture documentation as a result of the BES-SSP deferral.4/23/21 rap - The ASI and DHS continue to refine the final plan for the two portal vision. Two expect that final decisions will likely be made during this