JOSH GREEN, M.D. GOVERNOR



DOUGLAS MURDOCK CHIEF INFORMATION OFFICER

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES

P.O. BOX 119, HONOLULU, HAWAI'I 96810-0119 Ph: (808) 586-6000 | Fax: (808) 586-1922 ETS.HAWAII.GOV

March 22, 2024

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 10 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 Attorney General (AG), Child Enforcement Agency (CSEA).

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

Sincerely,

Douglas Murdock Chief Information Officer State of Hawai'i

Attachment

STATE OF HAWAII DEPARTMENT OF THE ATTORNEY GENERAL (AG) CHILD SUPPORT ENFORCEMENT AGENCY (CSEA)

KEIKI Replatform Off Mainframe (KROM) Project

AND

MONTHLY IV&V REVIEW REPORT

February 29, 2024 | Version 1.0





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Document History

DATE	DESCRIPTION	AUTHOR	VERSION
03/08/24	Monthly IV&V Review Report Draft created.	Julia Okinaka	0.0
03/19/24	Monthly IV&V Review Report finalized. Comments and responses included in Appendix D which resulted in minor updates on page 6.	Julia Okinaka	1.0

BACKGROUND

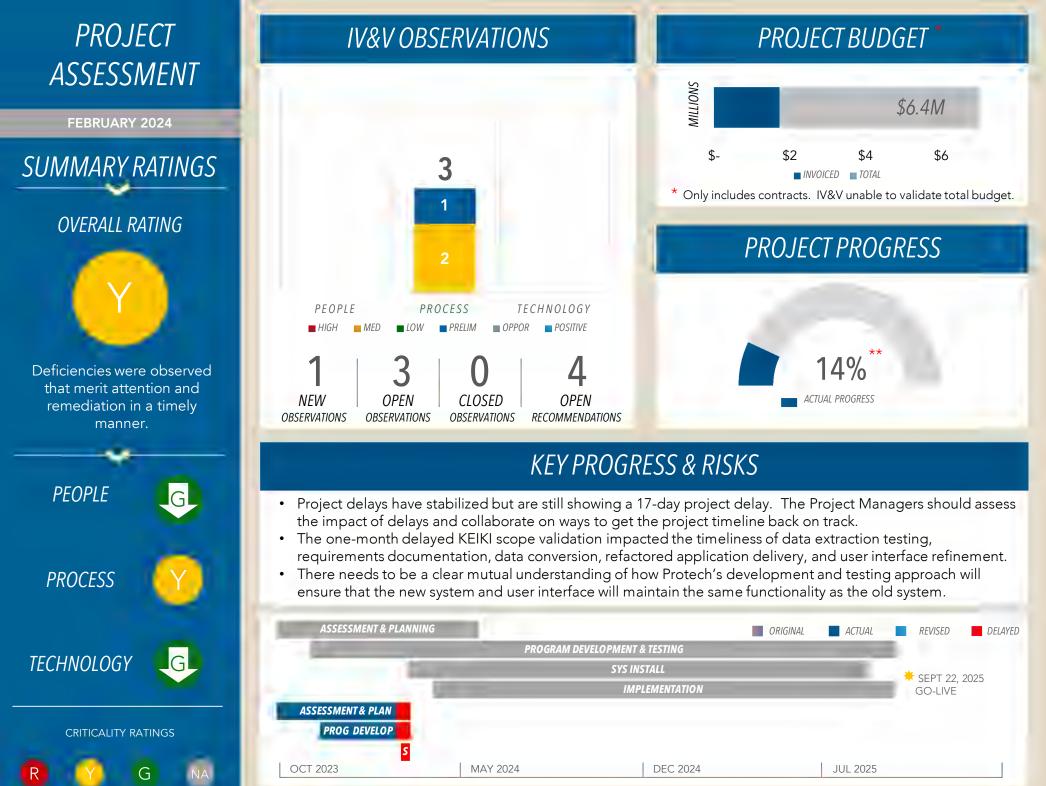
The State of Hawaii (State), Department of Attorney General (AG), Child Support Enforcement Agency (CSEA) contracted Protech Solutions, Inc. (Protech) on October 2, 2023 to replatform the KEIKI System and provide ongoing operations support. Protech has subcontracted One Advanced and DataHouse to perform specific project tasks related to code migration, replatforming services, and testing. Department of AG contracted Accuity LLP (Accuity) to provide Independent Verification and Validation (IV&V) services for the project.

Our initial assessment of project health was provided in the first Monthly IV&V Review Report as of October 31, 2023. Monthly IV&V review reports will be issued through September 2024 and build upon the initial report to continually update and evaluate project progress and performance.

Our IV&V Assessment Areas include People, Process, and Technology. Each month we will select specific IV&V Assessment Areas to perform more focused IV&V activities on a rotational basis. The focus of our IV&V activities for this report included the completion of a two-month assessment of Technology and the beginning of a two-month assessment of Process.

The IV&V Dashboard and IV&V Summary provide a quick visual and narrative snapshot of both the project status and project assessment as of February 29, 2024. Ratings are provided monthly for each IV&V Assessment Area (refer to Appendix A: IV&V Criticality and Severity Ratings). The overall rating is assigned based on the criticality ratings of the IV&V Assessment Categories and the severity ratings of the underlying observations.

TESTING - African Proverb



** IV&V unable to validate the progress percentage of the schedule as it does not include all project activities.

HIGH

MEDIUM

LOW

N/A

FEBRUARY 2024 · KROM PROJECT

DEC	JAN	FEB	IV&V ASSESSMENT AREA	IV&V SUMMARY
R			Overall	Project delays have stabilized but are still showing a 17-day project delay. Project managers should continue to work together to assess the impact of these delays and determine if any changes are needed to the overall project timeline (2023.10.002). There needs to be a clearer mutual understanding of how Protech's development and testing approach will ensure that the new system and user interface will maintain the same functionality as the old system (2024.02.001).
				<i>Project</i> Schedule: The primary reason for the 17-day extension of the project timeline was the one- month delay in completing the KEIKI application assessment validation. The assessment was completed in February which allowed other key project activities to move forward.
				Project Costs: Contract invoices received to-date are within total contract costs. The project will incur additional costs for AWS services and additional network bandwidth outside of the project implementor costs.
				<i>Quality</i> : The project is consistently reporting on various schedule metrics. The project should start reporting on the other agreed-upon quality metrics related to testing, issue, risk, and requirements.
				Project Success: CSEA drafted success metrics in January. The CSEA project manager will develop a plan on refining and reporting on success metrics next month.
ß		ß	People Team, Stakeholders, & Culture	 The Monthly Steering Committee (ESC) met in February. Consistent and active involvement by CSEA and Protech project sponsors is critical to project success. Project team members are engaged and actively participating in project status meetings providing status updates, asking questions, and discussing project activities. The project team worked together collaboratively and over weekends to test, execute and address data extraction issues. The impact of project delays on project resources should be considered when performing the assessment of the project schedule (2023.10.002) CSEA communicates with external agencies regularly and plans on working with Protech to identify external project stakeholders and communication activities starting in June 2024.

FEBRUARY 2024 · KROM PROJECT

DEC	JAN	FEB	IV&V ASSESSMENT AREA	IV&V SUMMARY
			Process Approach & Execution	 The project schedule does not include all project tasks and is being updated to include more granular-level project activities (2023.10.002). Project status reports and meetings were revised to be more beneficial and relevant. The streamlined status reports are facilitating greater understanding and allowing more time for meaningful discussion amongst project stakeholders (2024.01.001). The project is consistently reporting on various schedule metrics. The project should start reporting on the other agreed-upon project success and quality metrics (2024.01.001). In February, Protech delivered several key deliverables including the System Requirements Document and Test Plan which are still under review. CSEA already provided a number of comments and will work with Protech to refine the deliverables. There needs to be a clearer mutual understanding of how Protech's development and testing approach will ensure that the new system and user interface will maintain the same functionality as the old system (2024.02.001).
ß	R	R	Technology System, Data, & Security	 The KEIKI application assessment validation was completed in February; however, this 1-month delay impacted the timeliness of data extraction programming and testing, solution requirements documentation, data conversion planning, refactored application delivery, and UI refinement. The project confirmed the data extraction process approach and process and are working through several rounds of data extraction programming and testing. The project is working collaboratively to resolve issues related to large files, long running jobs, scope finalization, and file formatting. The final application and database conversions are dependent on finalizing the data extraction process. The estimated time for data extraction is still being determined. The data conversion plan will be delivered in April. CSEA will increase the network bandwidth from 5Mb to 25Mb with the mainframe datacenter to migrate large data during the project's data extraction and migration process. The System Architecture and Technical Architecture Plans were delivered and are under review. CSEA is working with Protech to incorporate feedback such as ensuring that the architecture build complies with key compliance standards such as IRS Publication 1075. The KEIKI environments will be provisioned and configured in the Amazon Web Services (AWS). The AWS system build and installation phase is delayed and will begin in March. CSEA facilitated a meeting with other State agencies to discuss the current state of cyberfusion and options to replace cyberfusion for future file transfer capabilities.

IV&V ASSESSMENT AREAS

People

Process

Technology

OBSERVATION #: 2024.02.001 ST

TITLE: PROGRAM DEVELOPMENT AND TESTING APPROACH CLARIFICATION

Observation: Additional information is needed regarding Protech's program development and testing approach.

Industry Standards and Best Practices: IEEE 15288-2023 and IEEE 29119 provide best practices and guidelines on system development and testing through the software development cycle.

Analysis: In February, Protech delivered the System Requirements Document and Test Plan which are still under review. CSEA already provided a number of comments for both deliverables requesting additional clarification or additional documentation. Both deliverables do not provide sufficient understanding of Protech and One Advanced's approach for the program development and testing phase. There needs to be a clearer mutual understanding of how Protech's development and testing approach will ensure that the new system and user interface will maintain the same functionality, data, and system interfaces as the old system. The System Requirements Definition deliverable is high-level documentation of items such as source code, data component, and interface tables but does not actually capture the required functionality using industry standard format for requirements. Documenting requirements Definition deliverable included a User Interface section but does not include sufficient information regarding UI requirements. Protech has another UI Refinement plan deliverable due in May 2024, however, it is unclear if UI requirements will be included in that deliverable.

If system requirements will not be used to manage development of UI as well as replatforming and refactoring of code work, then it is important to understand how Protech and One Advanced are planning to manage and report on development progress. Additionally, without documented system requirements, testing will be even more critical for identifying gaps in or issues with functionality during the development process. CSEA also has a number of comments and questions on the Protech Test Plan deliverable. In addition to the System Test Plan, Protech is developing an Acceptance Test Plan (UAT Plan) deliverable due in April 2024 which may help to provide additional clarification of the comprehensive testing strategy and delineation of testing responsibilities between Protech and CSEA.

CSEA plans to work with Protech to clarify and refine both deliverables. IV&V will continue to monitor this preliminary concern as additional information is discovered.

Recommendation: N/A for preliminary concerns.

Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

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

Criticality Rating

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

ISSUE An event that is already occurring or has already happened.

An event that has not

happened yet.

TERMS

RISK



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

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

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

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



Severity Rating

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

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

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



TERMS

POSITIVE Celebrates high performance or project successes.

PRELIMINARY CONCERN Potential risk

requiring further analysis.

ACCUIT

Appendix B: Industry Standards and Best Practices

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

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

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



Appendix C: Prior Findings Log



Appendix C: Prior Findings Log

SESSMENT	OBSERVATION		ODICIDIAL	CURRENT							
SSIVIEINI	ID	TYPE	ORIGINAL	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
55	2024.01.001	Risk	Moderate	Moderate	Ineffective project status meetings and reports can lead to delayed decision- making, lack of accountability, and reduced morale.	Weekly status reports are provided with a dashboard of the project status, high level schedule, late tasks, tasks planned this week, open tasks, 30- day look ahead, deliverable status, risks log, key decisions, change requests, and other project information. Despite numerous data points, the weekly project status reports may not give a complete picture of the project's progress. To get a better understanding of any delays, risks, issues, or action items, additional research and analysis of past reports, review of the Microsoft Project schedule, and inquiry with project members is necessary. For example, late project deliverables may be listed as simply "in progress", however, one is unable to determine how many additional days the deliverable was pushed back without checking the previous weekly status report and the reason for additional time is not discussed or disclosed.	 project status report and providing topics for weekly project meetings. Contribute to the improvement of project meetings and reports that actively engage team members and highlight key information relevant to the audience to promote problem-solving and constructive dialogue. CSEA could solicit feedback prior to meetings so the team can be prepared to ask questions or discuss relevant project topics. CLOSED: 2024.01.001.R2 – Set clear objectives for meetings and provide concise and relevant information that adds value. Meetings and reports without clear objectives can quickly turn into a one-way status update without any meaningful discussion or clear understanding of project status, risks, and issues. Provide reports that are concise, relevant and clear to the audience. Only include charts and tables that provide value and present data in a format that helps provide meaningful information to move the team forward. NEWI: 2024.01.01.R3 - Additional quality metrics and project success 		02/29/24: A new recommendation was added and two recommendations were closed. Two recommendations were closed as CSEA and Protech worked together to improve project status reports to be more clear, meaningful, and relevant to the audience. The streamlined status reports are facilitating greater understanding and allowing more time for meaningful discussion amongst project stakeholders. IV&V will continue to assess the effectiveness of project status reports and meetings.		
*55	2023.10.002	Risk	Prelim	Moderate	Untimely project management responsibilities may impact effective project execution.	management practices early will help the project start off right and stay on track. Protech's Project Manager is experienced with similar implementations and is working collaboratively with the project team to address feedback. Possible root causes or contributing factors are turnover of project	metrics should be added to project status reports. 2023.10.002.R1 – Improve the project schedule to address schedule comments. • Develop a detailed plan with assigned resources to complete project tasks. • Provide the appropriate detail of tasks, durations, due dates, milestones, and key work products for various parties. CSEA assigned tasks should also be clearly reflected in the project schedule. • Obtain agreement on the baseline schedule and then hold parties accountable for tasks and deadlines. 2023.10.002.R2 – Determine the root causes of delays and develop plans to address them. • Perform a root cause analysis including defining the problem, brainstorming possible causes, and developing a plan to address the root cause of the problem such as resource constraints and undefined tasks. • Based on the experience of the last two months, create a realistic schedule based on the time and resources needed to perform tasks. CLOSED: 2023.10.002.R3 – Assess the need for additional Protech resources for project management support. 2023.10.002.R4 – Have the CSEA and Protech Project Managers adopt a more joint, collaborative approach. • Have the PMs clearly define their roles and responsibilities in project management responsibilities. • Actively plan, share and execute project responsibilities.	Open	 11/30/23: This was originally reported in the October 2023 IV&V Monthly Report as a preliminary concern but was upgraded to and rewritten as a risk this month with recommendations. The project is still challenged with insufficiently updating deliverables and continued delays in the proposed project schedule. 12/31/23: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). More rigor on foundational project management practices is needed to prevent further delays and increase the quality of project execution. The approved project schedule still lacks detailed tasks to adequately plan project resources and monitor project performance. Although the project schedule has some percentage completion, the process to monitor and calculate metrics is unclear. 01/31/24: Despite several meetings, there is still a need for a greater shared understanding of schedule concerns between Protech and CSEA. This risk will continue to be evaluated with the recent addition of Protech resources to improve the timeliness of project execution, a recommendation was added that project managers can adopt a more joint, collaborative approach to share and clearly delineate project management responsibilities. 02/29/24: The project schedule does not include all project tasks and is being updated to include more granular-level project activities One recommendation was closed as Protech added additional project management resources. 		
nology	2023.12.001	Positive	Moderate	N/A	The Automated Application Assessment process was well planned and executed.	Protech's partner, Advanced, worked closely with CSEA's technical SMEs and outlined a clear, well-defined process to collect and assess the KEIKI mainframe application in preparation for the migration and code conversion. Advanced's weekly status updates and follow-ups helped all stakeholders understand their roles, responsibilities, outstanding tasks, and status of activities. Their final assessment report was comprehensive, data-driven and insightful, and prepared the project team well as they begin the next phase of legacy code and data system migration.	N/A	Closed	IV&V will continue to assess project management responsibilities.	01/31/24	Closed as this is a positive observation.

ESSMENT	OBSERVATION			CURRENT							
A hnology		TYPE Risk		SEVERITY Moderate	OBSERVATION Complex data system migration	ANALYSIS Data system migration and mapping can be complex and cause project		STATUS Closed	STATUS UPDATE 12/31/23: CSEA appointed two dedicated Data System Migration Leads. It is		CLOSURE REASON Risk closed as the inventory of no
mology	2020.11.001	NISK	Moderate	Moderate			and processes for non-code elements.	Closed	unclear if Protech also appointed a dedicated lead. A clear plan is still		code and ancillary elements was
					documentation and the absence of a		 A separate implementation plan should be clearly outlined, determining the 		missing, and CSEA documented a formal issue related to the lack of		completed.
					formalized process for non-code tasks,		timeline, tasks, tools, and resources needed to perform these activities.		information coordination and redundant requests related to the data system		completed.
					may lead to project delays, unmet		 Develop a formalized data migration acceptance process for the remaining 		migration requirements.		
					contract requirements, and quality		cycles with defined acceptance criteria.		Ingration requirements.		
					issues.		Determine what validation is needed by other agencies and stakeholders		01/31/24: Risk closed as the inventory of non-code and ancillary elements		
					1550051		that rely on CSEA's Keiki system and outputs.		including hardware, software, interfaces, and batch files was completed and		
						project has a formalized process for application code migration but lacks a			will be validated as part of the technical architecture and system requirements		
							2023.11.001.R2 – Investigate automated tools for tracking and validating		documentation.		
						hardware, software, interfaces, and batch files. The absence of a separate,					
							Automated data validation should be investigated to help identify missing				
							elements, increase data accuracy, and alleviate resource constraints.				
						affecting system performance and user experience.	· · · · · · · · · · · · · · · · · · ·				
							2023.11.001.R3 – Ensure data system requirements are comprehensive and				
						The SI's waterfall approach requires upfront gathering and definition of all					
							Given the waterfall approach, schedule and resource considerations should				
							be given to increasing system requirement gathering upfront.				
							The project managers should ensure greater coordination of project				
							information needed for requirements management and tracking.				
							Consider an iterative approach for non-code migration activities, which				
							allows for several rounds of review and validation.				
							2023.11.001.R4 – Appoint dedicated Data System Migration Leads from both				
							Protech and CSEA.				
							Consider identifying dedicated leads to assist with analyzing the existing				
							data environment, identifying data migration requirements, supporting the				
							migration process, troubleshooting issues that arise, and coordinating tasks				
							with Protech, Advanced, Datahouse, and CSEA.				
ple	2023.10.001	Positive	N/A	N/A	The project team members are engaged	The CSEA SMEs appear to be engaged in ongoing Assessment sessions	N/A	Closed	N/A	11/30/23	Closed as this is a positive
					and the environment between Protech	and accountable for timely completing required tasks, providing					observation.
					and CSEA is collaborative.	information, and responding to questions. The project team members					
						regularly seek feedback, input, and clarification in an open and respectful					
						manner. The experience and knowledge of Protech team members					
						combined with the dedication and high level of engagement from CSEA					
						SMEs support the positive project team environment.					



Appendix D: Comment Log on Draft Report



Comment Log on Draft Report

KROM Project: IV	V&V Document	Comment Log
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ID #	Page #	Comment	Commenter's Organization	Accuity Resolution
1	6	Technology section, fourth bullet – change MB to Mb	Department of AG/CSEA	Network bandwidth references corrected to 5Mb and 25Mb.
2	7	DDI recognizes there is a need for educating CSEA and those involved in the project on the approach to testing/evaluation of the refactored application. DDI will develop a presentation to educate the project on the approach to testing.	Protech	The comment pertains to future activities and IV&V acknowledges that a testing approach presentation would be beneficial. Any updates on upcoming activities will be provided in the relevant month, and no modifications were made to the February IV&V Report.

ACCUITY

FIRST HAWAIIAN CENTER Accuity LLP 999 Bishop Street Suite 2300 Honolulu, Hawaii 96813

P 808.531.3400F 808.531.3433www.accuityllp.com



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