

#### OFFICE OF ENTERPRISE TECHNOLOGY SERVICES

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April 15, 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 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 <a href="http://ets.hawaii.gov">http://ets.hawaii.gov</a> (see "Reports").

Sincerely,

Douglas Murdock (Apr 15, 2024 11:17 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: March 1 – 31, 2024

Submitted: April 12, 2024



#### Overview

- Executive Summary
- IV&V Findings and Recommendations
- IV&V Engagement Status
- Appendices
  - A IV&V Criticality Ratings
  - B Risk Identification Report
  - C Acronyms and Glossary
  - D Background Information





#### **Executive Summary**



The ASI delivered an updated BES Project Schedule that aligns with the approach to the BES Implementation modified in the Go to Green plan, resulting in a 2-month implementation delay for statewide Go-Live and a 6-month delay for functionality included in the Post-Statewide Go-Live. The level of risk to the BES Project was evaluated in this month's report based on the availability of data to IV&V regarding these key changes:

- The BES project schedule continues to be aggressive with minimal slack (extra) time to absorb unexpected delays without
  impacting the Go-Live dates. The ASI added one week of slack between Final Acceptance Testing and Pilot and another
  week of slack between Pilot and Statewide Go-Live.
- The proposed three-phased implementation approach adds complexity to the Project and requires additional project and technical management engagement and coordination. Concurrent development and testing phases create a risk to DHS in the form of rework (e.g., testing functionality as new code is added, retesting to ensure the new code does not negatively impact existing functionality, and managing defects across multiple testing phases).
- Executing the project schedule is straining project resources and the management of the phases adds to the effort.

The DHS and ASI project teams are committed to this Project and intend to deliver a quality product without creating further delays or shifting additional functionality post-pilot to meet the go-live targets.

Jan	Feb	Mar	Category	IV&V Observations
Н	E E	H	Project Management	This category continues to be red due to overlapping development and testing phases and IV&V's lack of insight into the ASI methodology used to support revised estimates for completing the remaining work. The ASI intends to provide its methodology to IV&V in the next reporting period.

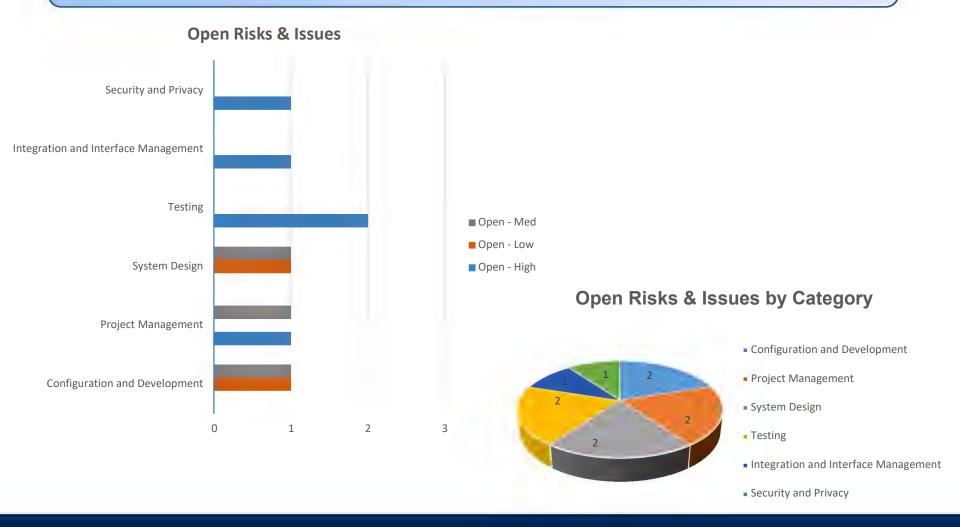
# **Executive Summary**



Jan	Feb	Mar	Category	IV&V Observations
( <u>M</u> )	M	M	System Design	DHS design feedback for Epic demo 261 (Approvals and Supervision) will require another demo to validate the changes made by the ASI. If this becomes a trend with other Epics, delays to Pilot and other milestones may occur.
( <u>M</u> )	improve ends quality 1\/2\/ will evaluate once we receive feetual data from the ASI			
H	H	Н	Integration and Interface Management	IV&V is reviewing the draft Interface testing plan, we will evaluate the criticality of this category after our review is complete.
H	H	H	Testing	The Project entered into System Integration Testing (SIT) without approved test scripts for some Epics that will be phased into SIT after testing begins. IV&V is concerned that phased-in functionality may require retesting and could extend the testing duration.
H	B	Н	Security and Privacy	The necessity to complete the 3rd Party Security Assessment before Pilot places significant pressure on DHS and the ASI to complete, test, and implement all required security documents, processes, and procedures This will remain a high-criticality category until the required security documentation is complete.

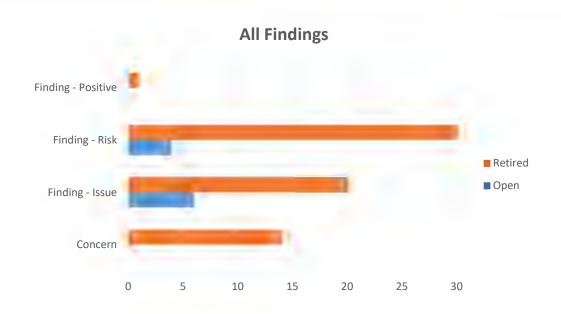


As of the March 2024 reporting period, PCG is tracking 10 open findings (4 risks, 6 issues) and has retired a total of 73 findings. Of the 10 open findings, 5 are High, 3 are Medium, and 2 are Low.





The following figure provides a breakdown of the 84 IV&V findings (positive, risks, issues, concerns) by status (open, retired).





#### Findings Retired During the Reporting Period



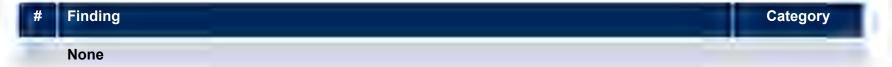


Preliminary Concerns Investigated During the Reporting Period





#### Findings Opened During the Reporting Period





#### **Project Management**

#	Key Findings	Criticality Rating
	Issue – A BES Project schedule based on inaccurate estimations diminishes effective planning and resource management, which could result in late deliverables, cost increases, and a late go-live.	
74	The BES Project Schedule that aligns with the Go to Green plan was published by the ASI during this reporting period. The overlap of Integration Testing (INT) and SIT, and adding functionality into SIT after it has started may lead to more delays as seen in prior schedules.	Н

Recommendations	Progress
<ul> <li>Monitor, evaluate and revise scheduling estimates for accuracy based on the project teams past performance and resources available to do the remaining work.</li> </ul>	In Process
ASI provide details on how Velocity measures were used to calculate the remaining development work.	Incomplete
<ul> <li>ASI conduct a Root Cause Analysis (RCA) with DHS and IV&amp;V to determine why the BES Project continues to experience schedule delays.</li> </ul>	Not Started
<ul> <li>ASI Project Management works with the development teams to evaluate the accuracy of Velocity and adjust accordingly to reduce risk in the revised BES project schedule.</li> </ul>	Not Started



#### **Project Management**

#	Key Findings	Criticality Rating
	Risk – Implementing a Core Solution for go-live carries inherent risks that may impact overall Project success and reduce user adoption.	
88	The ASI's Go to Green plan and project schedule were approved by DHS. Per the Go to Green plan, some required BES functionality will be implemented post-Pilot. This may create unplanned workarounds and rework as the full impact of this approach becomes known through testing and training.	М

Recommendations	Progress
<ul> <li>Increase OCM efforts to effectively manage user, general public, and legislative expectations for BES version at go-live.</li> </ul>	n In process
<ul> <li>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.</li> </ul>	In process
<ul> <li>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.</li> </ul>	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



#### 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.  DHS and IV&V are currently reviewing the draft Interface Test Plan published by the ASI this month; we will provide an update on this issue in the next report.	

Recommendations	
Confirm testing dates with interface partners in writing.	In process
<ul> <li>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.</li> </ul>	Not started



#### Configuration and Development

#	Key Findings	Criticality Rating
	Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution.	
70	Responsibility for the Configuration Management Plan (CMP) reverted to the ASI (previously, the DHS Security Contractor was updating the CMP for related security controls). The ASI is resuming this scope of work at a time when its resources are stretched and may lead to CMP and configuration management quality challenges.	

Recommendations	Progress
<ul> <li>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.</li> </ul>	In process
<ul> <li>ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track.</li> </ul>	In process
DHS and ASI work to clarify/solidify plans for the potential use of configuration management tools and DHS work to fund and procure a CM tool, as required, to avoid any negative impacts to the Project.	In process



#### Configuration and Development

#	Key Findings	Criticality Rating
	Issue – Development delays could negatively impact the project schedule and delay go-live.	
80	To address this issue, the ASI reported they built the revised BES Project Schedule with some slack/float time.	
	IV&V is researching Data Conversion and the impact, if any, it had on the most recent Schedule delay. The conversion team has some remaining data elements to map. They reported that the full scope of 'data cleansing' may not be complete before converting the data. IV&V is continuing to research and plans to provide an update in a future report.	M

Recommendations	
<ul> <li>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.</li> </ul>	In process
<ul> <li>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.</li> </ul>	In process
<ul> <li>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.</li> </ul>	Not started



#### System Design

#	Key Findings	Criticality Rating		
h	Risk – The planned BES infrastructure is complex which could be difficult to implement and maintain and could lead to schedule/cost impacts.			
73	During a recent Change Control Board (CCB) meeting the ASI presented DHS with a for-cost change request (CR) to the design of the Secure Enclave (the addition of roles). In the CCB, it was clear that DHS and the ASI were not in agreement regarding the funding of this change request.			

Recommendations	Progress
<ul> <li>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.</li> </ul>	In proces
<ul> <li>The project team work to establish strong governance over the utilization and maintenance of various tools/components.</li> </ul>	In proces
<ul> <li>ASI allot time in the schedule to conduct proof of concepts to assure infrastructure components work as expected.</li> </ul>	In proces
• ASI maintain a detailed schedule for DevOps implementation tasks to avoid unexpected delays that could delay project milestones and the critical path.	In proces



#### System Design

#	Key Findings	Criticality Rating			
	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.				
86	Due to a high number of questions and concerns from DHS during Epic demo 261 (Approvals and Supervision), the ASI committed to hosting another demo to address all the feedback. Changes raised late in the design process could require code changes, potentially causing schedule delays or the resulting solution not meeting the business need. DHS staff attending Epic demos should be prepared with an understanding of the agreed-upon designs and policy requirements relevant to the Epic so that feedback is efficient and on point.				
Rec	ommendations	Progress			
	nclude a wide enough audience in all design and demo sessions to validate FNS and DHS functional and echnical requirements and system usability.	In Process			
	erform Sprint and Epic demos in alignment with development Sprint completion (demo unctionality/requirements as they are developed) to get early feedback on work products.	Not Started			
а	rerform comprehensive (demo all requirements) review during Epic demos, not just the items that were dded/updated, allowing DHS to provide early feedback on possible issues/gaps that might not be apparent when focusing on specific functionality.	In Process			



#### **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.	
	DHS and the ASI entered into BES 1.0 SIT on 3/15/2024 without approved test scripts for several Epics that will be phased into SIT after testing begins. The phased introduction of test scripts can negatively impact testing and reduce the time available to identify and fix defects within scheduled timeframes. IV&V review of test scripts shows that quality could be improved by adding additional details or steps to the test scripts to verify test coverage.	(H)

F	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.	Not Complete
•	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



#### **Testing**

#	Key Findings	Criticality Rating
	Issue – The current mitigation approach to complete the development of the remaining R0.12 Epics is condensed and aggressive and may increase the likelihood of schedule delays, quality issues, and a higher volume of testing defects.	
89	On 3/15/2024, DHS and the ASI agreed to enter SIT for BES 1.0 without meeting the criteria for a complete test script package documented in BI-19 Complete and Final Test Plan. IV&V is concerned that starting SIT without the complete and approved SIT Test Script package may lead to schedule delays.	•
	The updated schedule reflects an overlap of BES 1.0 INT and SIT efforts which could result in resource constraints. Testing also overlaps across releases (BES 1.0 and BES 1.1) which adds complexity and risk when maintaining and coordinating code across multiple test environments.	

Recommendations		
Develop Contingency Plans if the mitigation plan continues to see slippage affecting INT and SIT.	In process	
<ul> <li>The ASI provides comprehensive INT results and SIT scenarios for incomplete Epics to DHS for review/approval ahead of SIT execution.</li> </ul>	In process	
<ul> <li>The ASI release a detailed schedule of events, including development completion, INT start, SIT start for each epic covered in the mitigation plan.</li> </ul>	h In process	
<ul> <li>The ASI should evaluate if Epics entering SIT late might require retesting functionality that had already been tested</li> </ul>	In process	



#### 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 March, the DHS/ASI security teams focused on documentation and the Tenable Nessus scans on the base BES Production environment (without the Secure Enclave). The Secure Enclave is not included in the BES 1.0 Core Release and will not be part of Pilot. Therefore, the upcoming 3 <sup>rd</sup> party security assessment will not include the Secure Enclave.				
	Security documents (e.g., data flow, network diagrams, Plan of Actions and Milestones (POAMs), and procedural documents such as Change Management procedures) may not be complete for the 3 <sup>rd</sup> party assessment starting in April, which may result in potential findings and POAMs for remediation if not available.				
	Additionally, DHS reported that several DHS Security and Privacy policies were not updated in the past 365 days as required by NIST 800-53.				

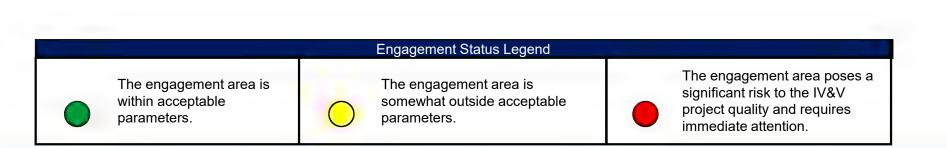
Recommendations	Progress
Determine when the infrastructure design baseline will be completed.	In process
Determine when documentation will be created, updated, and available for the SSP authors.	In process
Collaborate and communicate with SSP authors about when reliable and correct documentation will be available.	In process
<ul> <li>Perform a full review of all SSP controls for content and accuracy that have been written as drafts prior to the start of the Independent Security Controls Assessment of BES and submission of the SSP package to federal regulators. This will allow the SSP authors to update controls with changes from Design through Implementation.</li> </ul>	In process



# IV&V Engagement Status



IV&V Engagement Area	Jan	Feb	Mar	Comments
IV&V Budget				
IV&V Schedule				DHS and PCG are discussing the extension of the IV&V contract that currently ends in April 2024.
IV&V Deliverables				PCG submitted the final February IV&V Monthly Status Report.
IV&V Staffing				
IV&V Scope				



#### **IV&V** Activities



- IV&V activities in the March reporting period:
  - Completed February Monthly Status Report
  - Ongoing Review the BES Project Artifacts and Deliverables
  - Ongoing Attend BES Project meetings, (see <u>Additional Inputs</u> pages for details)
  - Reviewed available ASI contracts and contract amendments documentation.
- Planned IV&V activities for the April 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	03/13/2024, 03/20/2024, 03/27/2024	N/A
BI-5 Project Schedule - BES 2023 DDI	03/13/2024, 03/20/2024, 03/27/2024	N/A
Interface Test Plan	3/20/2024	N/A
M & O Project Schedule	3/25/2024	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
RO.12 Epic and Sprint Demo Recordings	N/A	N/A
ADA dashboard	N/A	N/A
Jira Requirements Details	N/A	N/A
Jira Testing Lists	N/A	N/A

#### **Additional Inputs**



#### **Meetings and/or Sessions Attended/Observed:**

- 1. IV&V Team Meeting 3/1/2024, 3/7/2024, 3/11/2024, 3/14/2024, 3/18/2024, 3/21/2024, 3/25/2024, 3/28/2024
- 2. IV&V February 2024 Pre-Draft MSR Findings Review 3/7/2024
- 3. HI DHS BES January Draft IV&V Report Review 3/13/2024
- 4. Bi-Weekly DHS and IV&V Touch Base 3/5/2024, 3/19/2024
- 5. Weekly BES Infrastructure meeting 3/1/2024, 3/8/2024, 3/15/2024, 3/22/2024
- 6. DHS/IV&V Check-in 3/14/2024, 3/28/2024
- 7. Weekly Client BES 2023 Project Status Meeting 3/13/2024, 3/20/2024, 3/27/2024
- 8. Security Touchpoint 3/6/2024, 3/13/2024, 3/20/2024, 3/27/2024
- 9. Weekly Data Conversion Workgroup 3/7/2024, 3/14/2024, 3/21/2024
- 10. (External Epic demo) Epic 261 Approvals and Supervision / Epic 241 Eligibility.. 3/1/2024
- 11. (External) Weekly Interfaces Touchpoint 3/4/2024, 3/11/2024, 3/18/2024, 3/25/2024
- 12. (External) Readiness Working Group Meeting 3/5/2024, 3/12/2024, 3/19/2024
- 13. (External) Bi-Weekly Client BES 2023 Schedule Review/Status 3/27/2024
- 14. (External) Bi-weekly BES CCB Meeting 3/6/2024, 3/20/2024
- 15. (External) BES: FNS Connect 3/14/2024
- 16. (External- Epic Demo) Epic 284 Process Case Changes, Renewals, and SMRFs- 3/1/2024
- 17. (External) C!A Current Weekly Checkpoint 3/5/2024, 3/12/2024, 3/19/2024
- 18. (External-Epic Demo) Epic 239 Payment Processing 3/8/2024
- 19. (External) BES M&O Migration Kickoff Meeting-3/11/2024
- 20. (External Pre-design) TANF Data Extract Epic 286–3/6/2024, 3/13/2024,
- 21. (External) BES 1.0 SIT Go/No-Go Meeting 3/15/2024
- 22. (External Epic Demo) Epic 257 Interview and Application and Epic 241 Eligibility Determination 3/15/2024
- 23. (External) BES BI-05 Project Schedules Responses Review Meeting cont'd 3/18/2024
- 24. (External) BES M&O Project Status Meeting 3/18/2024, 3/25/2024
- 25. (External Epic Demo) Epic 230 Repatriate, Refugee, and Asylee/ Special Circumstance Allowances / D-SNAP/Manual Benefits 3/28/2024
- 26. (External Epic demo) Epic 238 Claim Setup and Maintenance 3/28/2024
- 27. (External-Epic Demo) Epic 249 Automated Case Monitoring 3/28/2024





# Appendix A – IV&V Criticality Ratings

Criticality Rating	Definition
н	A high rating is assigned if there is a possibility of substantial impact to product quality, scope, cost, or schedule. A major disruption is likely, and the consequences would be unacceptable. A different approach is required. Mitigation strategies should be evaluated and acted upon immediately.
М	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.
·	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

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	Acronym	Definition
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	IV&V	Independent Verification and Validation
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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	MEELC	Medicaid Eligibility and Enrollment Life Cycle
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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	OIT	Department of Human Services Office of Information Technology
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SLA Service-Level Agreement	RTM	Requirements Traceability Matrix
9	SEI	Software Engineering Institute
SME Subject Matter Expert	SLA	Service-Level Agreement
•	SME	Subject Matter Expert





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** 

Title Reporter The current approach to complete Hackett, development of the remaining epics is Donna condensed and aggressive and may increase						Finding			
development of the remaining epics is Donna condensed and aggressive and may increase	er Type Date	Category Observation	Significance		Event Horizon Impact Probability Priority	Status	Status Update Client Comments		Vendor Comme
condensed and aggressive and may increase		Testing Ten of the Epics scheduled for completion before Release 0.12 SIT will in the ready. To avoid SIT delays, the current approach is to begin SIT with	not Overlapping development and testing introduces potential quality issues.  out Insufficient INT may create gaps in SIT, leading to further quality issues. This	Develop Contingency Plans if the mitigation plan continues to see slippage No affecting INT and ST The ASI provides comprehensive INT results and ST.	tow 4 5 High	Open	3/31/2024 - On 3/15/2024, DHS and the ASI agreed to enter SIT for BES 1.0 without meeting the criteria for a complete test script package documented		04/10/2024 -
	13356	the 10 Epics and test them as they are completed. Additionally, Release	0.12 may increase the risk of significant delays or introduce defects into the	scenarios for incomplete Epics to DHS for review/approval ahead of SIT			in BI-19 Complete and Final Test Plan. IVV is concerned that starting SIT		eWorldEs used
the likelihood of schedule delays, quality issues, and higher volume of testing defects.		development that was extended two weeks from the scheduled end dat been extended for another ten business days.	e has production environment.	execution The ASI release a detailed schedule of events, including			without the complete and approved SIT Test Script package may lead to schedule delays. The updated schedule reflects an overlap of BES 1.0 INT		followed the sar
issues, and higher volume of testing defects.		been extended for another ten business days.		development completion, INT start, and SIT start for each epic covered in the			schedule delays. The updated schedule reflects an overlap of BES 1.0 INT and SIT efforts which could result in resource constraints. Testing also		entry criteria as documented in
				mitigation plan The ASI should evaluate if Epics entering SIT late might require retesting functionality that had already been tested The plan to			overlaps across releases (BES 1.0 and BES 1.1) which adds complexity and		19 for BES 1.0. T
				complete BES implementation does not include overlapping testing phases			risk when maintaining and coordinating code across multiple test		were no amend
							environments. 2/22/2024 - During the February 21, 2024, Weekly Project		to the BI-19 ne
							Status Meeting and February 28, 2024, BES Schedule Review Meeting, the ASI introduced and detailed the draft Go-to-Green plan. However, edits to		as a result of the decision. An exc
							the plan continue and final DHS approval is outstanding. The draft Go-to-		was made by Di
							Green plan indicates an ongoing overlap of development and testing		the Client
							activities as functionality will be phased into pilot and statewide rollout.		Correspondence
							System Development Best Practices recommend no testing phases be overlapped because of the amount of rework and instability this causes to		that were being reviewed by DH
							the project team and solution. 1/31/2024 - To mitigate the INT and SIT		approval.
							overlap and incomplete SIT test scripts, the ASI moved the start of SIT to February 2nd, with "Informal" SIT continuing in January. Despite this		
							February 2nd, with "Informal" SIT continuing in January. Despite this attempt, continued development delays and code quality issues led to		
							attempt, continued development delays and code quality issues led to adding 2 integration testing sprints, further extending integration testing.		
							Additionally, on January 31, 2024, the ASI announced the delay of the		
							February 2nd SIT entry date and stated that a new mitigation approach to		
							meet the August Go-Live date was under development. IV&V has updated this finding to an "issue" and the Criticality Rating to 'High'.		
Implementing a Core Solution for go-live Fors, Mic			their Going live with a limited version of a software product entails inherent risks	, • Increase OCM efforts to effectively manage user, general public, and N	Now 3 3 Med	Open	03/30/24 - The ASI's Go to Green plan and project schedule were approved		
carries inherent risks that may impact overall project success and reduce user	Risk	Management stated timeline. This version is generally referred to in Agile software	such as potential challenges in securing user buy-in. This can result in	legislative expectations for the Core Solution approach. • Prioritize feedback from users and FNS to ensure the Core Solution meets their core needs and			by DHS. Per the Go to Green plan, some required BES functionality will be implemented post-Pilot. This may create unplanned workarounds and		
adoption.		version of a product that 1) offers functionality that meets the core ner	I limited user adoption, user dissatisfaction, and negative publicity, eds of particularly considering the financial investment made for the delivery of	so users are clear on what features they are, and are not, getting in the			rework as the full impact of this approach becomes known through testing		04/10/2024 -
		users, 2) can accelerate the timeline for go-live, and 3) allows the proje	ct to limited functionality. A compressed timeline may compromise the quality of	f released product. • Actively monitor, assess, and address potential			and training. 02/29/24 - The ASI drafted a Go-to-Green plan that includes		"Some required
		get real-world feedback from users to refine future product developme	nt. designs, user interface sophistication, and lead to an uptick in software bug	challenges throughout the core solution development process including			an October 2024 Go-Live date, with several features to be released after		functionality wi
			and suboptimal code. Further, this approach may expose the project to regulatory compliance risks, such as last-minute objections from regulatory	code quality, cutting scope to meet development milestones, insufficient			Pilot. Implementing the functionality of a core solution not tested in a real- world Pilot environment may lead to unexpected issues and bugs. IVV		implemented p Pilot." What do
			bodies like FNS, which could find certain system elements non-compliant	workarounds to accommodate for the missing functionality.   DHS carefully			remains concerned that user expectations will not be fully met as the go-live		mean? I think I
			with their standards and delay the go-live date. Misalignment between	assess whether the advantages of a timely release outweigh the advantages			system will be missing functionality that could be important to many users.		the intent and p
			stakeholder expectations and the Core Solution may lead to dissatisfaction	of going live with a system that provides more comprehensive functionality,			01/23/23 - The ASI recently transitioned the OCM leadership role to a new		update as such
			or a lack of support for the project and could negatively impact future project funding requests, implementing a limited Core Solution typically	requires fewer workarounds, and increases user satisfaction and buy-in.   Actively monitor tester and pilot feedback and track users biggest pain			resource. OCM activities will be crucial in reducing the risk associated with implementing the Core Solution and effectively managing user, public, and		"Per the Go to 0
			requires the customer to implement multiple workarounds until automated	points. Pain points can then be prioritized based on negative impact and			legislative expectations. The ASI has stated they do not expect this transition		plan, the ASI pla
			features can be built into the system. Users could become impatient if thes	e project leadership can decide if fixing or changing poor designs can be			to negatively impact the project and have noted some potential		implement requ
			features are further delayed when bug fixes and other features take	implemented prior to go-live.			improvements. 12/31/23 - Delays in some planned activities (e.g., epic		functionality in
			precedence. Others may lose confidence that the features or system improvements will ever be implemented. Going live with a solution that is				demos, interface designs) and the development of the secure enclave are causing milestones to be missed. IVV remains concerned about potential		multiple release (Pilot/Statewide
			missing functionality that stakeholders were expecting typically requires an				quality impacts due to the need to accelerate efforts to compensate for		Statewide)."12/
			increase in OCM efforts both by the ASI and DHS staff to temper				missed milestones. Delays in some planned activities (e.g., epic demos,		23 - Above alres
			stakeholders' reactions to a system with limited functionality.				interface designs) and the development of the secure enclave is causing		addressed by D
							milestones to be missed. IVV remains concerned about potential quality impacts due to the need to accelerate efforts to compensate for missed		Campos.Ensure recommendatio
							milestones.		reflect "In Progr
									"In Process".
Limited collaboration between the ASI and Molina, B DHS in the design process could lead to BES	Brad Finding - 8/1/2023	System Design During the UAT process for release 11, there has been a high level of	A significant amount of money and DHS resource time have been invested in	n OPEN - Include a wide enough audience in all design and demo sessions to No	Now 4 3 Med	Open	03/31/2024 - Due to a high number of questions and concerns from DHS 10/11/2023 Jessica - Our SMEs are providing their during Epic demo 261 (Approvals and Supervision), the ASI committed to the items that I clarified with IV&V, that there are fe	feedback. This is one of	of
urability irruer and functionality gaps in the	Issue	concerns raised by the DHS testers regarding the usability of the BES sy	stem, the BES solution, with the expectation that the new system will at minimum en provide all functionality found in current applications – but really should	validate FNS and DHS functional and technical requirements and system			hosting another demo to address all the feedback. Changes raised late in the feedback means design is ok. I rec'd an emal back f	readack given, no	04/10/2024 -
applications and not meeting critical		layout issues that would not be expected in a modern application. Base	ed on provide additional capabilities, greatly enhanced user interface, and overall	sprint completion (demo functionality/requirements as they are developed)			design process could require code changes, potentially causing schedule wants to meet with our reviewer to validate this.	OIII JOE I . UNIX IVAX	eWorldES disag
business needs for DHS and State clients.		defect reporting from the UAT process, a large majority of the defects a	are improved usability from current systems. Should the solution fall short of	to get early feedback on work products Perform comprehensive (demo all			delays or the resulting solution not meeting the business need. DHS staff		with the current
		related to "design errors". Although the Release 11 UAT cycle was testi partially build system, a significant amount of design defects was	ing a expectations, there may be challenges in DHS staff adoption; lack of confidence in the solution providing the accurate information needed to	requirements) review during Epic demos, not just the items that were added/updated, allowing DHS to provide early feedback on possible			attending Epic demos should be prepared with an understanding of the		finding update.
		partially build system, a significant amount of design defects was attributable to functionality developed for Release 11.	provide benefits to HI citizens: reduction in ability for DHS to provide the	issues/gaps that might not be apparent when focusing on specific			agreed-upon designs and policy requirements relevant to the Epic so that feedback is efficient and on point. 02/29/2024 · One demo (Epic Demo		demo attendees involved with So
			same level of needed services to clients, resulting in bad publicity for DHS	functionality. CLOSED - ASI and DHS re-evaluate the effectiveness of the			211) was held in February as the ASI focused on developing a Go-to-Green		demos or plann
			and the state.	recorded Sprint review process to ensure that designs align with DHS expectations. (closed 3/31/2024)			Plan for the Project. DHS also raised concerns in Readiness meetings regarding a gap in design where eligibility is not forced to run when critical		sesssions are
				expectations. (closed 3/31/2024)			regarding a gap in design where eligibility is not forced to run when critical benefit data is modified on a case — which could also point to a gap in		providing feedback. DHS !
							collaboration on key design decisions. 01/31/2024 - DHS viewed Sprint		are involved fro
							demos for Epics 247 and 284 on January 9, 2024, where several		get-go. DHS is n
							concerns/issues were raised, resulting in necessary bug fixes. User		
							experience issues that should have been raised during the sprint demos		having internal
									having internal conversations o
							were brought up during the Epic Demo for Epic 240 (repayment agreements), that the ASI is not considering at this time. As of the end of		having internal
							agreements), that the ASI is not considering at this time. As of the end of January, the ASI was developing a Go-to-Green Plan to mitigate several		having internal conversations o reading design documents. DH! should be havin
							agreements), that the ASI is not considering at this time. As of the end of January, the ASI was developing a Go-to-Green Plan to mitigate several delays, including demos. 12/31/2023 - DHS opened a new high-severity		having internal conversations of reading design documents. DH should be havin internal meetin
							agreements), that the ASI is not considering at this time. As of the end of January, the ASI and sedveloping a Got-Oriener Plan to Intigate several delays, including demos. 12/31/2023 - DH5 opened a new high-seventry project risk, which then escalated to an issue, on December 4, 2023, since		having internal conversations o reading design documents. DH
							agreements, that the ASI is not considering at this time. As of the end of January, the ASI was developing a Go to Greene Plant to mitigate several delays, including demos. 12/31/2023. OHS opened a new high-seventy project risk, which then escalated to an issue, on December 4, 2023, since the sprint and epic demos will not be completed by the end of the Release		having internal conversations or reading design documents. DH should be havin internal meetin discuss policy.
							agreements, that the Alls not concluding at this time. An of the end of January, the All was deceloging a Cost of Service Most general delay, including demon. 1912/1002-110 (Stogened a new high security propertor, which there excluded us an issue, or December 1912, since propertor, which there excluded us an issue, or December 1912, since propertor, which there excluded us an issue, or December 1912, since 1912 (Stogeness and Stogeness 1912) (Stogeness 191		having internal conversations c reading design documents. DH should be havin internal meetin discuss policy. 10/31/2023 - Vic - Conversat
							agreements, that the ASI is not considering at this time. As of the end of Jaharung the ASI was developing a Coto of Service producing a Coto of Service project prix, which these cataloaded so an issue, or security and specific project prix, which these cataloaded so an issue, or security and specific project prix, which these cataloaded so an issue, or security and specific project prix, which these cataloaded so are such as a considerable project prix, and specific project prix,		having internal conversations or reading design documents. DH should be havin internal meetin discuss policy. 10/31/2023 - Vic - Conversat with BES PMO :
							agreements, that the AS is not considering at this time. An of the end of January, the AS was deceloging a Coto-Orderon Hospican Serveral delay, including demon. 19/31/2073 at 1056, opened new high-ewentry project risk, which the excluded so a tissue, opened new high-ewentry project risk, which the excluded so a tissue, opened new high-ewentry project risk, which the excluded so a tissue, on the spiral and agic denots will not be completed by the end of the febricase and the exclusion of the exclusion of the exclusion of the exclusion of the time of the exclusion of the exclusion of the exclusion of the impacted egic, potentially pushing out the schedule. 11/3/2023 - As of the end of November, the ASA same fing friend exclusion of the end of November, the ASA same fing friend exclusion and great projects.		having internal conversations or reading design documents. Di- should be havin internal meetir discuss policy. 10/31/2023 - Vic - Conversat with BES PMO live demos. Wi
							agreements, that the ASI is not considering at this time. An often and of January, the ASI was developing a Goto of Service several delay, including demon. 1/23/10/23-1045 opponed a new high-severity properturi, which there excluded to an issue, or excluded to a lissue, or properturi, which there excluded to an issue, or excluded to a lissue, or the sprint and explication of the Release In 2.12 Carp plane. Which seeks the coverage was desclosered admirg the demon will require additional design, development, and storing for the impacted explicit posturity pushing out the activities. 1/13/2012-3 of the compact of the service of the service of the service of demon. Depending on the outcome, this could cause the ASI to settled demon. Depending on the outcome, this could cause the ASI to settled demon. Depending on the outcome, this could cause the ASI to settled demon. Depending on the outcome, this could cause the ASI to settled demon. Depending on the outcome, this could cause the ASI to settled demon. Depending on the outcome, the foundation to got demon. Depending on the outcome, the foundation to got the second transport of the se		having interna- conversations reading design documents. Di should be havi internal meeti discuss policy. 10/31/2023 - Vic - Conversa with BES PMO live demos. W as recorded di
Gaps in test coverage and slower-than-	;, Finding - 6/2/2023	Tetting After examining the Project's R11 QA Dashboards, R11 Tracebility	identifying defects only is vital for effective testing, as it is more efficient	OPEN The ASI should determine the root cause of the failure to identify.	UUT 4 4 High	Open	agreements, that the ASI is not concidenting at this time. As of the end of January, the ASI was decoding a Good Enders (and the ASI is not concidenting at the Good Enders (and the ASI is not concidenting at the decident of the ASI is not concident and the ASI is not concern the the spirat and epic, there was all not be completed and the spirat and epic them 0.12 COD place. We there the concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered during the decident and the ASI is not concern, as issues discovered and the decident and the ASI is not concern, as is not as a decident and the ASI is not concern, as is not as a decident and the ASI is not concern, as a decident and the ASI is not concern. The ASI is not concern and as a decident and as a decident and as a decident and as a decident and as a decident an		having interna- conversations reading design documents. Di should be havi internal meeti discuss policy. 10/31/2023 - Vic - Conversa with BES PMO live demos. W as recorded di
expected progress in testing may result in Donna	t, Finding - 6/2/2023 Issue	Dashboards, and Test Repository, gaps in testing coverage may exist an	d the and cost-effective to address issues during the early testing stages. If there	simple defects in INT and SIT and implement effective improvement	IAT 4 4 High	Open	agreement, that the ASI not considering at this time. As of the end of agreement, that the ASI not considering a does for several than to instigate several properties of the ASI not th		having internal conversations reading design documents. Di should be havi internal meeti discuss policy. 10/31/2023 – Vic - Conversal with BES PMO live demos. Wi as recorded de but we address
expected progress in testing may result in Donna schedule delays if subsequent test phases	t, Finding - 6/2/2023 Issue	Dashboards, and Test Repository, gaps in testing coverage may exist an progress of testing might be lagging. Concerning testing coverage, it ap	d the and cost-effective to address issues during the early testing stages. If there pears is slow progress or incomplete testing in the early stages, it can result in	simple defects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT	JAT 4 4 High	Open	agreements, that the ASI is not considering at this time. As of the end of Jahanup, the ASI was decembering a Goto Enders Than to intigitate several didelay, including demon. 1/31/2073-1045 opened a new high seventy propertor, which there in excluding but annous, on December 4, 2013, since the compact of		having internal conversations reading design documents. Dis- should be have internal meeti- discuss policy. 10/31/2023 - Vic - Conversal with BES PMO Ilve demo. Was recorded de but we addres: 04/10/2024 -
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Title Reporte  The lack of technical documentation may Heath, E		ied					Adiatyse	Finding			
	rter Type Date	Category	Observation In April, the ASI/DHS system security plan (SSP) authors began writing	Once the system architecture and design have been completed, the SSP	Recommendation  Determine when the infrastructure design baseline will be completed	Prior to the start of	t Probability Priority 5 4 High	Onen	Status Update 03/30/2024 – During March, the DHS/ASI security teams focused on	Client Comments	Vendor Comments
lead to incorrect implementation statements	Risk	Privacy	implementation statements. Currently, the technical documentation	authors may need to edit or rewrite implementation statements. A full draft	Determine when documentation will be created, updated, and available for		3 4 11811	Орен	documentation and the Tenable Nessus scans on the base BES Production		1/12/2024 -
or delay the System Security Plan			supporting the SSP is unavailable, outdated, or in a draft form. During April,	of the SSP is scheduled to be published August 15th , 2023, and the final SSP	the SSP authors Collaborate and communicate with SSP authors about	assessment.			environment (without the Secure Enclave). The Secure Enclave is not		
			decisions on what tools support the SSP controls are still being decided on.	(ready for federal partner review) is scheduled for September 15, 2023. The SSP is a large technical document with hundreds of controls and control	when reliable and correct documentation will be available Perform a full				included in the BES 1.0 Core Release and will not be part of Pilot. Therefor	e,	Progress should re "In process". Davi
			of how the system should be designed from the SSP author's perspective	enhancements, and each one requires an implementation statement of how	drafts prior to the start of the third-party assessment and submission of the	•			the upcoming 3rd party security assessment will not include the Secure Enclave. Security documents (e.g., data flow, network diagrams, Plan of		Rolla conducted a
			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	the control or enhancement has been met.	SSP package to federal regulators. This will allow the SSP authors to update				Actions and Milestones (POAMs), and procedural documents such as		level review of the
			know and use documentation such as System Architecture and Design,		controls with changes from Design through Implementation.				Change Management procedures) may not be complete for the 3rd party		controls and shar
			network topology, dataflow, ports and protocols, tools used for logging, etc.						assessment starting in April, which may result in potential findings and POAMs for remediation if not available. Additionally, DHS reported that		with Barbara/Virg feedback during t
									several DHS Security and Privacy policies were not updated in the past 365		week of December
									days as required by NIST 800-53. 02/29/2024 - The security staff resolved		(prior to submitti
									issues in the Google Assured Workloads services for the Secure Enclave. The ASI continues to remediate findings from the vulnerability and compliance	ne	to SSA). The implementation s
									Asi continues to remediate findings from the vuinerability and compliance scans on the environment and work through issues related to the Tenable		for each control
									Nessus credentialed scanning. The security team rescheduled the due date	s	updated to reflec
									for the supporting security and privacy documentation for the SSP and		current status as
									intends to be completed by March 4th, 2024. Since there is a proposed		12/12. This active should not be
									schedule change in the project's "Go-To-Green Plan", this finding remains a risk instead of being elevated to a realized issue. 01/31/2024 – The DHS	1	confused for a se
									and ASI security teams continue to work on the secure enclave and		controls assessn
									documentation that supports the SSP. Documents scheduled for completion	n	which is audit-st
									by 1/31/24 include the secure enclave SSP additions, Incident Response Pla (IRP), Privacy Impact Analysis (PIA), Configuration Management Plan, and	in .	validation of the controls — typic
									Continuous Monitoring Plan. Other procedural documents will be complete	nd .	conducted by a
									by the end of February 2024. As the Independent Security Controls		party.
									Assessment is dependent on the completion of some of these documents		
Development delays could negatively impact Fors, Mi	Michael Finding - 6/30/20	2022 Configuration and	ASI had previously reported development activities have been slowed as	If the ASI is unable to achieve a velocity that enables them to meet planned	OPEN • Request the ASI effectively track and regularly provide DHS	Immediate	3 3 Med	Open	and artifacts, incomplete documentation may result in assessment findings 03/31/24 - To address this issue, the ASI reported they built the revised BE	5	As stated before
the project schedule and delay go-live.	Issue O/30/20	Development	they have been unable to achieve and/or maintain their expected	milestones, schedule delays may lead to a delayed system go-live date.	(potentially via the weekly DDI status meeting) with an accurate velocity				Project Schedule with some slack/float time. IVV is researching Data		10/31/2023 - Vi
			development velocity. Previously, the development team was challenged	Failure to achieve a level of accuracy in estimating development tasks could	(e.g., story points per day/week/month) and assure that the current velocity				Conversion and the impact, if any, it had on the most recent Schedule delay		mixed bag here.
			with accurately estimating development task level of effort (i.e., story points) and the project has been challenged with producing a project	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		•			The conversion team has some remaining data elements to map. They reported that the full scope of 'data cleansing' may not be complete before		are mentioning of misunderstanding
			points) and the project has been challenged with producing a project schedule that accurately reflects realistic timelines (see Finding #74). The	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	demonstrations (demos) and elicit productive design discussions with DHS				reported that the full scope of 'data cleansing' may not be complete before converting the data. IVV is continuing to research and plans to provide an		misunderstandir MF - improve th
			ASI continues to be challenged with finding qualified resources in a timely	specifications that developers could consume without requiring extensive	attendees during each demo. • ASI regularly report estimated story points				update in a future report. 02/29/24 - The ASI reported additional delays		design
			manner.	clarification from the ASI BA/SA team. DHS and IVV observed instances	for the total remaining project work to reach go-live and presents a dynamic				that will push out Go-Live to October 2024, based on the draft Go-to-Green	1	communication
				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	ourn-oown chart to track the progress. COMPLETE CLOSED • DHS request the ASI strategically add the right project team resources to effectively				plan. The ASI reported the Root Causes of this delay include Excessive defects, - Lack of Code quality with downstream impacts to include		Rama - I am tryi understand wha
				contributed to unproductive design sessions (see Finding #61). It remains	increase velocity. Note that adding additional junior resources may not be as	5			additional defects and critical blockers causing delays with Sprint and Epic		understand wha development de
					effective as staffing additional expert-level development, analysis, and other				demos and the completion of Integration Testing, - Development delays		two months left
					resources that can lead and mentor junior resources. • ASI reviews the development process and identifies and mitigates the challenges preventing				with the Hana/BES interface and Secure Enclave. The draft Go-to-Green		DDI.
					development process and identifies and mitigates the challenges preventing them from incorporating Epic demo activities into the project schedule.				plan includes reorganizing the development team to have more experience developers focus on critical defects and consistent enforcement of	d	Vic - we wil eval the draft.
					(9/29/23 - ASI will not be doing this, with DHS approval)				development standards across all development teams and other process		the district
									improvements. 01/23/24 - Ongoing development delays are still affecting		
									the Project, requiring additional development and INT Sprints and		
									postponing Sprint and Epic demos. To keep the planned go-live date the project elected to overlap INT and SIT, but this is subject to the Go-to-Gree		
									Plan that the ASI announced at the end of January. 12/31/23 - The ASI		
									reported development delays related to 10 epics but has also produced a		
									mitigation plan to manage these delays and stay on track for go-live. IVV remains concerned that any additional delays might push out the project		
									schedule and implementation milestones. 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 BES Project schedule based on inaccurate Molina.	Dead Finding 44/20/20	2021 Perlent	DHS and the ASI have tried multiple times to rework the schedule with	If estimates for project schedule activities are not accurate, this can lead to	COSTA Marrier and an incompanion and incompani	Immediate	3 4 High	0	missing requirement for PIN issuance. Additional development sprints wer 3/31/2024 - The BES Project Schedule that aligns with the Go to Green plan	e	
estimations diminishes effective planning	na, Brad Hinding - 11/29/20 Issue		results that have not yielded improvement. Concerns with the structure,		based on the project teams past performance and resources available to do	Immediate	3 4 High	Upen	was published by the ASI during this reporting period. The overlap of	1	
and resource management, which could result in late deliverables, cost increases,			estimating practices, and ability to manage to the schedule persist. The use	rushed activities, and general frustration which can lead to schedule delays,	the remaining work ASI provide details on how Velocity measures were				Integration Testing (INT) and SIT and adding functionality into SIT after it		04/10/2024 -
result in late deliverables, cost increases,			of multiple tools to track resources obfuscate resource management.	low quality output, scope changes, and budget issues.	used to calculate the remaining development work ASI conduct a Root				has started may lead to more delays as seen in prior schedules. 2/29/2024	i.	Please confirm t description of th
and a late go-live.			Previous IV&V findings focused on specific schedule components such as		Cause Analysis (RCA) with DHS and IVV to determine why the BES project				The Project has experienced many delays, the most recent of which was a four-week delay announced the end of January and the draft Go-to-Green		description of th
					and the same to assess the same asked to delete a SEL Replace Management where						
			resource management and critical path analysis, all of which were addressed and closed.		continues to experience schedule delays ASI Project Management works with the development teams to evaluate the accuracy of Velocity and adjust				Plan is adding another six months. 1/31/2024 - At the start of January, a 4		issue is still relev The overlap of te
			resource management and critical path analysis, all of which were addressed and closed.		with the development teams to evaluate the accuracy of Velocity and adjust accordingly to reduce risk in the revised BES project schedule. COMPLETE				Plan is adding another six months. 1/31/2024 - At the start of January, a 4 week schedule delay to SIT was reported by the ASI to avoid an overlap of		The overlap of to is not unique to
			resource management and critical path analysis, all of which were addressed and closed.		with the development teams to evaluate the accuracy of Velocity and adjust accordingly to reduce risk in the revised BES project schedule. COMPLETE DHS and the ASI agree to a revised schedule against which project				Plan is adding another six months. 1/31/2024 - At the start of January, a 4 week schedule delay to SIT was reported by the ASI to avoid an overlap of INT and SIT. On January 31, 2024, the ASI reported that SIT would not start		The overlap of to is not unique to software develop
			resource management and critical path analysis, all of which were addressed and closed.		with the development teams to evaluate the accuracy of Velocity and adjust accordingly to reduce risk in the revised BES project schedule. COMPLETE DHS and the ASI agree to a revised schedule against which project deliverables can be managed. (2/28/2023 - comoletel ASI host a weekly				Plan is adding another six months. 1/31/2024 - At the start of January, a 4 week schedule delay to SIT was reported by the ASI to avoid an overlap of INT and SIT. On January 31, 2024, the ASI reported that SIT would not start as planned. The project status report indicated "Red" in most categories as		The overlap of to is not unique to software develop projects. What
			resource management and critical path analysis, all of which were addressed and closed.		with the development teams to evaluate the accuracy of Volcotty and adjust accordingly to reduce risk in the reduce risk by the recibility. COMPLETE DRS and the ASI agree to a revised schedule against which project deliverables can be managed, (12/78),7003 - completed, ASI nost a weekly meeting with DHS and IVIV to review all changes to the project schedules (Primary and DDI), (3/31/203 - completed) (CMSD BA) plan and execute Spic.				Flan is adding another six months. 1/31/2024 - At the start of January, a 4 week schedule delay to ST was reported by the AS to avoid an overlay of IRT and ST. On January 31, 2024, the ASI reported that ST would not start as planned. The project status report indicated "Red" in most categories and the ASI reported they were developing a Go-to-Green Plan. Further delays may be imminent. IVV has raised the criticality rating of this finding the control of this finding to the control of the project status reports of the control of this finding to the control of this finding the criticality rating of this finding to		The overlap of te is not unique to software develop projects. What d "adding functio
			resource management and critical path analysis, all of which were addressed and closed.		with the development teams to evaluate the accuracy of Velocity and adjust accordingly to reduce risk in the revised ES project schedule. COMPLETE DHS and the ASI agree to a revised schedule against which project deliverables can be managed. (2/38/2023 - 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 ASI plan and execute Epic developments of that Epic demos can accura railrie in the release schedule				Plan is adding another six months. 1/31/2024 - At the start of January, a 4 week schedule dealy to ST was reported by the ASI sovid an overlap of INT and SIT. On January 31, 2024, the ASI reported that SIT would not start as planned. The project stalus report indicated "Red" in most categories are the ASI reported they were developing a 60-to-Green Plan. Further delay; may be imminent. INV has raised the criticality rating of this finding to "High". 1/31/31/203-3 with 10 opts. for release 0.12 in development,		The overlap of te is not unique to software develop projects. What c "_adding functic into SIT after SIT started continue
			recourse management and critical path analysis, all of which were addressed and closed.		with the development teams to evaluate the accuracy of Velocity and adjust, accordingly to render in kin the revised BS project schedule. COMPLITE DRS and the ASI agree to a revised schedule against which project deliverables can be amanaged. (CJ/RIJOS) - complete (ASI total a weekly meeting with DRS and MV to review all changes to the project schedules (Primary and DIO) [43].7/2023 -complete (ASI COSE) ASI pain and execute Epic development so that Epic demos can occur earlier in the release schedule and allow time for possible revisions. (LIJS).7/2023 ASI possible revisions. (LIJS).7/2023 ASI possible revisions. (LIJS).7/2023 ASI possible revisions. (LIJS).7/2023 ASI possible revisions. (LIJS).				Flan is adding another is in months. 1/31/2024 - At the start of January, a 4 week schedule diship to SIT was reported by the ASI to avoid an overlap of NT and SIT. On January 31, 2024, the ASI reported that SIT would not start as planned. The project stabur report indicated "Red" in most categories and the ASI reported they were developing a Go-to-Green Plan. Further delays way be imminent. What a raised the criticality raing of this finding to "Righ". 1/2/31/2023 - With 10 opics for release 0.12 in development, another development and integration testing spirit was added to the	d	The overlap of te is not unique to software develop projects. What d "adding function into SIT after SIT started continues persist in the BES
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which could be difficult to implement and		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	If the level of effort to implement and manage the complexities of the BES informational in one of co-casiney accounted for and saidfed by the ASI, the project could be met with unexpected costs and schedule delays. Delays in finalizing the composites being implement code ascerates the schedule schedule of the other delays. Complex platforms often present system conceased potential or system failure (i.e., for the the upplication level bugs, thereby, some composers of management of the project receivity experienced a system failure (i.e., for the composers of complexity) and increase the control and the schedule of the project receivity experienced a system failure because Google Cloud failed to clearly communicate a change that let for Salaria in all conditions and control of the control of the schedule of the schedul	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 Low	Open	Fine is adding worther air morths. 1,112/12024. At the start of Lamany, a few wask schedule delay or Them septodely by the IX and and an ownering wask schedule delay or Them septodely by the IX and and a ownering a sea a planned. The IX are septodely and the IX and and a ownering a sea planned. The IX are proved that the IX and and them IX and a sea a planned. The IX are proved the IX and IX and IX and IX are provided to IX and IX a	d a a a a a a a a a a a a a a a a a a a	The coverage of the coverage o
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which could be difficult to implement and		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	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 infrastructure is not accurately accounted for and staffed by the ASI, the infrasting the components being implemented could exacerbate their risks and least to further delays. Complex platforms often present system manistrances and presents challenges as spetch charges can hold the of "moving part") and increase the level of time and effort to resolve infrastructure and application level bags, "truther, some components remain in an immutuse state compared to their legacy counterparts. For example, the project recently experienced a system Status because Google component (i.e., theren). Google Cloud is generally viewed as a less mature product offering, compared to their risk, further, which will be a staff of the component of their risk, further, which will be a staff or the component of their risk, further, which will be a staff or the component of the risk platform with Services, but the component of the risk platform with Services, but the staff of the staff or the st	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 Low	Open	Fine is adding worther air months. 11/11/2024 A this start of Lamanup, a few wask schedule delay in 25 was seprended by the 12 and and an evering wask schedule delay in 25 was seprended by the 12 and and an evering the schedule of the 12 and and an evering a schedule of the 12 and and an evering a plant of the 12 and and an evering a plant of the 12 and an every schedule. We have been supported and a plant of the 12 and an every simple of the finding to 12 and an every simple of the finding to 12 and an every simple of the finding to 12 and every simple of 12	d a a a a a a a a a a a a a a a a a a a	The overlaps of its control of the control of its c
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which could be difficult to implement and		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	If the level of effort to implement and manage the complexities of the BES infrastructure is not according counted for and staffed by the ASI, they project could be made thumsupercised costs and brailed delays. All they project could be made thumsupercised costs and brailed delays. All they infinalizing the components being implemented could exacerbate this risks and lead for further delays. Complex palartons of the present yellow and lead for further delays. Complex palartons have present an accordance and operations challenges as system changes can had the infrastructure and application-level bugs. Further, some components in an immutant settle compared to their flagsey counterpress. For example, the project recently experienced a system failure because Google exacerby company developed as a less mature product offering, compared to their miss (Annazos Web Services, Microrald Anazo). All the project (including pace) by the production failured) that could points in the project (including pace) by the production failured) that could point in the project (including pace) by the production failured) that could be considered to the compared to the time of the counterpress of the mining our MABO lasts to State exhaulty relaxed. Most Obstatoring cost that many our MABO lasts to State	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 Low	Open	Fine is adding another in months. 1,111/12024. At the start of lammary, a wave skin-childed delay of this superior by the Ris and and on overlap of NY and \$17.0 (S) among \$3,120.0, the AND reported that \$17 would not start with the AND reported the AND reported that \$17 would not start with the AND reported The	d d d d d d d d d d d d d d d d d d d	The coverage of its control of its or unload to sufficient design of the coverage of the cover
which could be difficult to implement and		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	If the level of effort to implement and manage the complexities of the BLS infrastructure is not accurately accounted for and staffed by the ASI, the project could be not with impoprection cand and shealide delay. Delay in and level to further delays. Complex part of the province of th	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 tow	Open	Fine is adding another in months. 1,121/2024 A. the start of Lamsuny, a few wask schedule delay for the supported by the 12 and and an overlap of the 12 and an overlap on the 12 and an overlap on the 12 and and an overlap on the 12 and and an overlap on the 12 and an	d d d d d d d d d d d d d d d d d d d	The covering of to its ord unique to its ord uni
		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	If the level of effort to implement and manage the complexities of the BLS infrastructure is not accurately accounted for and staffed by the ASI, the project could be not with impoprection cand and shealide delay. Delay in and level to further delays. Complex part of the province of th	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 Low	Open	Fine is adding worther are months. 17/12/2024. At the start of Lamsuny, a few wask schedule delay on Them septoded by the Mary and on the worth of the worth of the start of a worth of the start of the	d d d d d d d d d d d d d d d d d d d	The looving for the control of the c
which could be difficult to implement and		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	If the level of effort to implement and manage the complexities of the BLS infrastructure is not accurately accounted for and staffed by the ASI, the project could be not with impoprection cand and shealide delay. Delay in and level to further delays. Complex part of the province of th	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 tow	Open	Fine is adding another in months. 1,11/1,2021.4. At the start of Lanuary, a function should be controlled to the start of Lanuary and watership and the start of Lanuary and L	d d d d d d d d d d d d d d d d d d d	The working of the six of unique to
		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	If the level of effort to implement and manage the complexities of the BLS infrastructure is not accurately accounted for and staffed by the ASI, the project could be not with impoprection cand and shealide delay. Delay in and level to further delays. Complex part of the province of th	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 Low	Open	Files in adding worther air months. 17,127,2024 - At the start of Lamany; a few wask schedule delay of the supported by the 12 and and an evering the wask schedule delay for the supported by the 2 and and a evering the said schedule of the 12 and and a schedule of the 12 and and a schedule of the 12 and and a schedule of the 12 and and and and a plant of the 12 and and and a plant of the 12 and and and a plant of the 12 and and and and a plant of the 12 and and and and a plant of the 12 and	d d d d d d d d d d d d d d d d d d d	The working of the in on unique to u
which could be difficult to implement and		2021 System Design	Current ASI infrastructure plans include a significant number of sophisticand components that make up a complex cloud infrastructure. Death of the superior of	If the level of effort to implement and manage the complexities of the BLS infrastructure is not accurately accounted for and staffed by the ASI, the project could be not with impoprection cand and shedule delay. Delay in and level to further delays. Complex part of the province of the	with the development teams to evaluate the excuracy of Verlecky and abjut conforming to restore in the two reveals the project schedule. COMPUTE concepting the content is to the revised the project schedule. COMPUTE deliverable can be managed. (12/18/2021 - complete) AGI float a weekly except the content of the content	Next several months	2 2 Low	Open	Fine is adding another in months. 1,11/1,2021.4. At the start of Lanuary, a function should be controlled to the start of Lanuary and watership and the start of Lanuary and L	d d d d d d d d d d d d d d d d d d d	software developed projects. What do do "defee jancetone" was a series of the control of the

D. Title		Identified Date Category	Observation	Significance	Recommendation Event Hor	Analy rizon Impact Probability Priori	st Finding	Status Hadata	Client Comments	Vendor Comments
	Fors, Michael Finding -		d The BI-6 DDI Plan Deliverable. Section 5.2 establishes the framework for the		OPEN • ASI adhere to plans for configuration management as documented ASAP	2 2 Low		3/31/24 - Responsibility for the Configuration Management Plan (CMP)	Chene Comments	venosi comments
could lead to development confusion and	Risk		Configuration Management Plan, however, it remains unclear if sufficient		in BI-6 DDI Plan, Section 5.2 and clarify details and/or any changes with DHS.		- april	reverted to the ASI (previously, the DHS Security Contractor was updating		
reduce the effectiveness of defect resolution		progress has been made toward establishing CM processes and governance,		ASI validate plans for configuration management with DHS and agree on a			the CMP for related security controls). The ASI is resuming this scope of		10/31/2023 -	
			selecting CM tools (e.g., CMDB), and building out the CM infrastructure. The		meaningful set of configuration items or settings they will track. • DHS and			work at a time when its resources are stretched and may lead to CMP and		Vic - We provided
			projects Security Plan has yet to be finalized which may include additional	with accurate, dynamic and timely information on some of the configuration	ASI work to clarify/solidify plans for the potential use of configuration			configuration management quality challenges. 2/29/24 - No material		listing, working on
			requirements or decisions that could impact CM. The project currently	items. However, it is critical that DHS/ASI agree to the full list of items that	management tools. COMPLETED • Identify the DHS POC for the			update in this reporting period. 1/23/24 - No material update in the		plan to implement.
			relies on Github for tracking of some configurations.	are included in the configuration plan along with the details regarding the	Configuration Management Activities that would provide oversight of			reporting period. 12/31/23 - The project will utilize the DHS contractor		MF - Broad catego
				management of the configuration items, reporting and audit features.	configuration management activities and assure defined CM steps and plans			currently assisting with security activities to update the Configuration		Vic - we are working
					are being followed, are effective, and are achieving DHS objectives for CM.			Management Plan (CMP). The scope of work that the DHS contractor is		on the details now.
					7/31/2022			responsible for is unclear to IVV. 11/30/23 - The ASI has yet to provide a		This will become m
								detailed list of configuration items to DHS and IVV. IVV has restated this		important and we
								request to the ASI so that the level of detail is clear. 10/26/23 - The ASI		work to get ahead
								provided broad information on the configuration items being tracked but		the M&O plan.
								have yet to provide detailed configuration items for IVV review. The ASI has		10/11/2023
								deprioritized some configuration management activities, which it intends to		
								perform in preparation for Maintenance and Operation (M and O). 9/28/23		IV&V requested
								<ul> <li>The ASI gained DHS' approval on the items that will be tracked and monitored as part of configuration management. IVV requested the list last</li> </ul>		list last month 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.		waiting on the ASI respond - Pleas
								7/31/23 - No material update. 6/30/23 - No material update. 5/31/2023 -		see the following li
								The ASI continues to make progress with its utilization of the ServiceNow		of configuration
								Configuration Management (CM) tool. They have recently performed an		management items
								initial import of Google Cloud Platform server details into the ServiceNow		which are/will
								Configuration Management Database. *** Continued work. Setup in		managed in
								ServiceNow, will be building up instances. Ongoing support and main.		ServiceNow:
								Dont' think still a risk, IVV to discuss. 4/30/2023 - The ASI finalized the		Incident Response
								ServiceNow (SN) modules they will utilize for the project. 3/31/2023 - The		Change/Configurat
								ASI is currently evaluating which Service Now (SN) modules will be the best		Management
3 The lack of early planning and coordination		1/21/2021 Integration and		DDI project often underestimate the time needed to effectively manage all		AT 5 4 High	Open	3/31/2024 - DHS and IV&V are currently reviewing the draft Interface Test		
with interface partners may result in	Mark Issue	Interface	and documented by the ASI Connectivity is planned to utilize a presently		Complete early proof of concept interfaces to avoid unexpected delays due			Plan published by the ASI this month; we will provide an update on this issue		
schedule delays.		Management	undefined ETS API Gateway; however, there is no evidence that details have		to external organization miscommunications or their own internal delays in			in the next report. 02-29-2024 - The MOU/MOAs were completed and the		10/31/2023 - Goo
			been determined or documented in this regard There is little evidence of	planning, and execution activities along with milestone dates can minimize				Interface Control Documents (ICD) are updated. The interface testing team		and accurate as of
			active and sufficient communication with interface partners for		analysis to determine the reason FDDs were changed without DHS			did not produce the testing plan on February 16th as specified in the draft		end of October.
			coordination, design, and testing activities (Unit Test, SIT, UAT) Interface	interface partners will have to be available during interface implementation				Go-to-Green plan. 01-31-2024 - The final two MOA/MOUs were signed.		Met with DoTAX (C
			planning and execution tasks and activities, including those for interface	to ensure that the interfaces are properly developed and tested before	interface partner for the duration of the BES DDI activities. COMPLETED			Interface development is behind schedule and will require workarounds		to get appendix
			partners, are neither resident nor managed within the Project Schedule.	deploying the system to production.	10/29 2. Identify and document all interface partners' contacts. COMPLETED			when FAT begins. The ASI faces challenges with interface partners that lack		details. Sent to Sco
					3/31/2022 3. Define a release schedule for each interface to include milestone dates, coordination, and execution and share with the interface			test environments. The interface testing team has not scheduled meetings, nor published test plans and schedules to coordinate with the interface		M. to finalize upda then send to AG.
					partners. COMPLETED 01/04 4. Determine which deliverable will include			partners. 01-04-2024 – Due to the number of open issues that could		DoTAX is one of the
					the details associated with the planned connectivity and detailed technical			potentially impact interface development (e.g., incomplete agreements,		interfaces that will
					designs of all interfaces. COMPLETED 01/04 5. Complete all MOAs and			unavailable test regions, and interface/batch testing schedules yet to be		overlap SIT. They a
					obtain formal approvals. CDMPLETED 01/31/2024			defined) IVV has raised the criticality rating to High. 11-30-2023 - Two of		busy in the tax sea:
								the 23 MOA/MOUs (DLIR and DoTAX) are not signed and remain		Dusy III the tax sea.
										Vic - Rama has
								the 23 MUA/MUUS (DLIK and DO IAX) 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		Vic - Rama has updates. Pushback
								outstanding. DHS continues efforts to complete these agreements to		
								outstanding. DHS continues efforts to complete these agreements to minimize further impact on the project. This finding is now an issue due to		updates. Pushback
								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		updates. Pushback from OIT about
								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		updates. Pushback from OIT about sample files.
								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 urage. This SSA documentation is expected to be ready by December 15th, 107 days prior to		updates. Pushback from OIT about sample files. Rama - set up a ba
								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 SA 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 plot. Although the SSA has informally stated that they can		updates. Pushback from OIT about sample files. Rama - set up a bar team for end-to-en
								outstanding, DHS continues efforts to complete these agreements to minimize further impact on the project. This fidnill gis 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 Occember 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		updates. Pushback from OIT about sample files. Rama - set up a ba team for end-to-en coverage. We met
								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 be submitted 100 days before the pilot's data usage. This SSA documentation is espected to be ready by December 15th, 107 day prior to April 21th pilot. Although the SSA has informally stated that they can complete the review within the shorter timeframe, a risk exists to the variability of the SSA dats. The interface stempt generated in		updates. Pushback from OIT about sample files. Rama - set up a ba' team for end-to-en coverage. We met with Ryan S. and O
								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 100 by between the prick of usa usage. The SSA in documentation is expected to be ready by December 13th, 107 days pair to documentation in sepected to be ready by December 13th, 107 days pair to documentation in sepacted to the ready by December 13th, 107 days pair to documentation in the second termination, a risk exist to the availability of the SSA data. The interface testing issum was organized in November, but planning lass not began and methigs. have not commenced.		updates. Pushback from OIT about sample files. Rama - set up a bat team for end-to-en coverage. We met with Ryan S. and O about sample files.
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