

KEITH A. REGAN COMPTROLLER KA LUNA HOʻOMALU HANA LAULĀ

CHRISTINE M. SAKUDA
CHIEF INFORMATION OFFICER
LUNA 'ENEHANA

STATE OF HAWAI'I | KA MOKU'ĀINA O HAWAI'I DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES | KE'ENA HO'OLANA 'ENEHANA

P.O. BOX 119. HONOLULU, HAWAII 96810-0119

December 16, 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 Nadine K. Nakamura 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 Nakamura, and Members of the Legislature:

Pursuant to HRS section 27-43.6, which requires the Chief Information Officer to submit applicable independent verification and validation (IV&V) reports to the Legislature within 10 days of receiving the report, please find attached the report the Office of Enterprise Technology Services received for the State of Hawai'i, Department of Attorney General (AG), Child Enforcement Agency (CSEA).

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

Sincerely,

Christine M. Sakuda Chief Information Officer State of Hawai'i

Attachments (2)



MONTHLY IV&V REVIEW REPORT

October 31, 2024 | Version 1.0



Table of Contents

EXECUTIVE SUMMARY

| Background | 3 |
|----------------------------|-----|
| IV&V Dashboard | 4 |
| IV&V Summary | 5 |
| Preliminary Observation(s) | N/A |

IV&V OBSERVATIONS

| Appendix A: IV&V Criticality and Severity Ratings | 7 |
|---|----|
| Appendix B: Industry Standards and Best Practices | 9 |
| Appendix C: Prior Findings Log | 12 |
| Appendix D: Comment Log on Draft Report | 21 |



BACKGROUND

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

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

Our IV&V Assessment Areas include People, Process, and Technology. Each month we will select specific IV&V Assessment Areas to perform more focused IV&V activities on a rotational basis.

The IV&V Dashboard and IV&V Summary provide a quick visual and narrative snapshot of both the project status and project assessment as of October 31, 2024. Ratings are provided monthly for each IV&V Assessment Area (refer to Appendix A: IV&V Criticality and Severity Ratings). The overall rating is assigned based on the criticality ratings of the IV&V Assessment Categories and the severity ratings of the underlying observations.

TEAMWORK AND PERSERVERANCE

"Tough times don't last.
Tough teams do."

- Robert Schuller



PROJECT ASSESSMENT

October 2024

SUMMARY RATINGS

OVERALL RATING



Deficiencies were observed that merit attention. Remediation or risk mitigation should be performed in a timely manner.

PEOPLE



PROCESS



TECHNOLOGY



CRITICALITY RATINGS

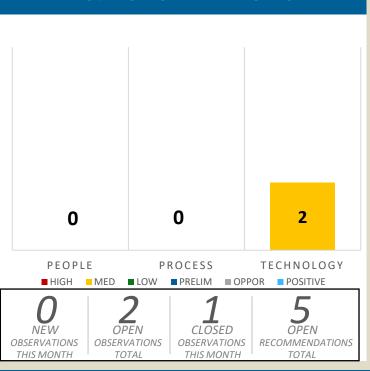


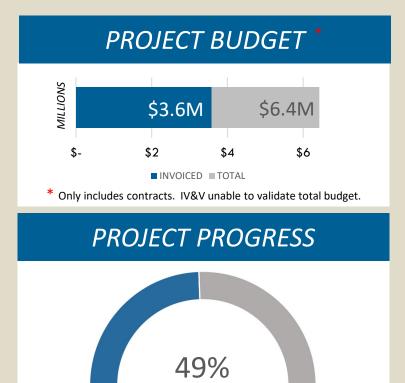
G





IV&V OBSERVATIONS

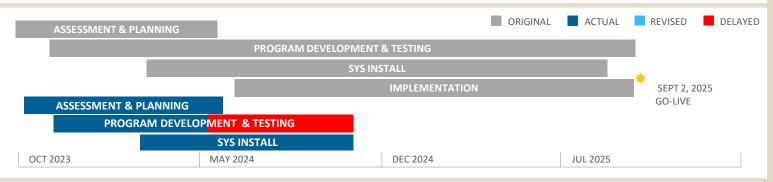




ACTUAL PROGRESS

KEY PROGRESS & RISKS

- Testing report metrics delivered key measurements this month to include overall performance metrics providing more transparency on project progress. Recommendation: 2024.08.001.R1 (Testing Report Metrics and Measurements) IV&V confirms closure.
- Data Integrity: While the date/time discrepancy has been resolved, some data integrity aspects, such as occasional low values and data inconsistencies, still need attention. The continued focus from CSEA on these areas will help ensure data accuracy and support testing efforts effectively.
- The project is progressing, with milestones for critical tasks on track. However, ongoing issues related to test data, system integration, and testing environment limitations need continuous monitoring and resolution to maintain the overall schedule.
- Code Delivery: The latest code delivery (v1.0.0.14) started deployment on 10/31/24 with prior versions already deployed, addressing a total of 126 resolved defects.



OCTOBER 2024 · KROM PROJECT

| AUG | SEPT | ОСТ | IV&V ASSESSMENT AREA | IV&V SUMMARY |
|-----|------|-----|--------------------------------------|--|
| Y | Y | Y | Overall | Project Schedule: The project's Completion Performance Index (CPI) slipped to .98, indicating a nine-day schedule variance. Despite this, the project is still targeting the preferred Go-Live date of September 1, 2025. The project is progressing, with milestones for critical tasks on track. |
| | | | | Project Costs: Contract invoices received to-date are within total contract costs. |
| | | | | Quality: The testing status reports have significantly improved to provide transparency for metrics which assists CSEA in tracking real time progress. The project quality status reflects steady progress with improvements in defect resolution and data consistency, though some areas, like data integrity and interface testing, still require focused attention to meet project standards. Regular risk meetings are held every other week, in which the project schedule for upcoming deadlines and activities are tracked and presented. |
| | | | | Project Success: Resolution of Key Data Issues: Critical discrepancies, such as date/time and packed field issues, were successfully resolved, improving data accuracy for testing. Advancement in UAT Workshops: User Acceptance Testing workshops were effectively conducted, covering areas like Case Management and Order Establishment, helping refine testing scripts and system understanding. Progress in Code Delivery and Defect Fixes: Multiple stable code versions were delivered, with over 120 defects resolved, supporting smoother testing cycles and functionality improvements. Enhanced Testing Metrics Reporting: Weekly reports now include detailed metrics such as pass/fail rates and defect trends, providing stakeholders with better visibility into testing progress. Effective Collaboration on Batch Job Validation: Collaborative efforts between CSEA and vendors streamlined batch validation processes, using new configurations to address batch processing issues. |
| G | G | G | People Team, Stakeholders, & Culture | Protech, DataHouse, and CSEA continued to work closely in weekly meetings and testing workshops, ensuring alignment on priorities and effective problem-solving. CSEA played an active role in data delivery, code review sessions, and testing validation, demonstrating commitment to project success and facilitating timely decisions on key issues. The project team maintained an adaptive approach, especially in resolving batch processing and data integrity challenges, emphasizing flexibility and a proactive mindset that will continue the project momentum. Project leadership provided clear direction and priorities, keeping critical UAT and code delivery activities on track and fostering accountability among team members. CSEA has established a process and the recommended meetings with the Chief Data Officer, achieving alignment on data exchange policies and impact assessments, allowing this recommendation to be closed (2024.07.001.R1). |

OCTOBER 2024 · KROM PROJECT

| AUG | SEPT | ОСТ | IV&V ASSESSMENT AREA | IV&V SUMMARY |
|-----|------|------------|-------------------------------------|---|
| | | • | Process Approach & Execution | The team continues to have weekly recurring meetings where the Protech PM provides status updates, describing the current focus of the week, updates on production test data, system testing, user interface, as well as updates on schedule, delivery status, key decisions, and change requests. Risks continue to be logged and actively discussed during weekly risk meetings, utilizing a RAID log to track risks, actions, issues, and decisions, with updates written for each item. Data validation processes have been improved, addressing prior issues like date/time discrepancies and packed fields. However, additional validation steps are still needed to address ongoing data integrity issues, such as low values and erroneous data (2024.08.001.R1). There were no reported updates for binary and ASCII file handling in October to understand whether any mitigations are necessary (2024.08.001.R3). Interface testing is underway, but data completeness from external partners has been inconsistent, leading to some delays. Continued collaboration is expected to improve data availability and support smoother testing cycles (2024.08.001.R2). Dependencies on shared mainframe resources have been a recurring challenge. Protech and CSEA have begun exploring alternative configurations to alleviate reliance on mainframe resources during peak testing periods (2024.08.001.R4). |
| V | V | (V) | Technology System, Data, & Security | The technology focus in October included enhancements to data extraction processes, aiming to improve data consistency for testing, and ongoing optimization of batch job performance, particularly to address extended runtimes (Observation ID 2024.06.001). Progress was made in resolving key data discrepancies, such as date/time issues, contributing to a more stable testing environment (Observation ID 2024.06.001). Backup and restore testing continues to ensure system reliability, with a recommendation for early resource and space assessments (Observation ID 2024.06.001). Additional configuration and performance tuning remain priorities to ensure efficient batch processing and overall system readiness for upcoming test phases (Observation ID 2024.06.001). |

Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

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

TERMS

RISK

An event that has not happened yet.

ISSUE

An event that is already occurring or has already happened.

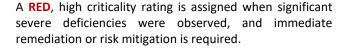
Criticality Rating

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















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







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



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



Severity Rating

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

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

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



SEVERITY 1: High/Critical level



SEVERITY 2: Moderate level



SEVERITY 3: Low level



TERMS

POSITIVE

successes.

Celebrates high

performance or project

Potential risk requiring further analysis.



Appendix B: Industry Standards and Best Practices

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

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

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

Appendix C: Prior Findings Log



Appendix C: Prior Findings Log

| | OBSERVATION | | ORIGINAL | CURRENT | | | | | | | |
|---------|-------------|------|----------|---------|--|---|--|--------|--|----------|---|
| AREA | | | SEVERITY | | OBSERVATION | | | STATUS | | | CLOSURE REASON |
| Process | 2024.08.001 | Risk | Moderate | Low | Industry Standards and Best Practices: | There is currently a weekly testing report provided to the Project Team. The report | | Closed | -,,,,,,-,-,-,-,-,-,-,-,-,-,- | 10/31/24 | There is now an aligned and improved test |
| | | | | | IEEE 730-2014 standard recommends | conveys the number of testing scenarios in process, however the report does not | | | been made in the most recent reports and provide a clearer understanding for | | reporting metrics with stakeholder |
| | | | | | | offer a total number of test cases to be processed for each workstream, nor does it | | | all stakeholders. IV&V will continue to monitor as these improvements to | | communication that affords efficiency and |
| | | | | | information to ensure effective | convey full metrics, such as percentage of completion of the total scope within the | key stakeholders can easily understand the report's findings and | | visiblilty progress. | | agility in the team making informed |
| | | | | | communication of testing and quality | testing categories and how those align with the project schedule parameters. This | implications. | | | | decisions. |
| | | | | | assurance activities. | can contribute to risk when total transparency is not displayed. | | | 10/31/2024: 2024.08.001.R1 (Testing Reports) The weekly testing reports now | | |
| | | | | | | | Metrics and Measurements: The separate weekly test report | | include pass/fail rates, coverage metrics, defect tracking, and milestone | | |
| | | | | | | | should provide metrics that reflect the quality of the software, | | updates, providing a clearer understanding of testing progress and project | | |
| | | | | | | | such as pass/fail rates, coverage of tests (e.g., percentage of test | | health. This aligns with the recommendation for improved reporting metrics | | |
| | | | | | | | cases executed), and other relevant testing metrics, i.e., total | | and stakeholder communication. | | |
| | | | | | | | scenarios to be tested, percentage of completion and timeline | | | | |
| | | | | | | | for completion. | | | | |
| | | | | | | | Schedule and Milestones: The current status of the testing | | | | |
| | | | | | | | schedule should be reported, noting any deviations from planned | ı | | | |
| | | | | | | | milestones and deadlines. The report should reflect the current | | | | |
| | | | | | | | state of testing completion tracking as aligned with the project | | | | |
| | | | | | | | schedule. | | | | |
| | | | | | | | Decisions and Change Requests: Any key decisions made | | | | |
| | | | | | | | during the testing phase, including approved or pending change | | | | |
| | | | | | | | requests that impact testing or quality assurance activities, | | | | |
| | | | | | | | should be included. | | | | |
| | | | | | | | Siloulu de Iliciadea. | | | | |
| | | | | | | | | | | | |
| | | | | 1 | | | | | | | |

| ASSESSMENT | OBSERVATION | | ORIGINAL | CURRENT | | | | | | | |
|------------|-------------|------|----------|----------|--|--|---|-------|--|-------------|----------------|
| AREA | ID | TYPE | SEVERITY | SEVERITY | OBSERVATION | ANALYSIS | RECOMMENDATIONS ST. | TATUS | STATUS UPDATE | CLOSED DATE | CLOSURE REASON |
| Technology | 2024.06.001 | Risk | Moderate | Moderate | There is a risk for delays in the data | The data extraction process is critical for the cutover activities and current | 2024.08.001.R1 - Verification of Data Extraction and Conversion Op | pen | 7/31/24: CSEA is still investigating and testing the SQL to SQL solution, | | |
| | | | | | extraction process, which is critical for | projections show potential for significant delays. This issue results from reliance on | Processes | | however, the testing results are still not meeting CSEA's expectations. CSEA's | | |
| | | | | | the cutover activities, due to reliance on | shared mainframe resources, inefficiencies in data extraction programs, and long | Standard(s): IEEE 1012-2016 Emphasis: Verification ensures | | decision is due during the first week of August. Because of CSEA's concern that | | |
| | | | | | shared mainframe resources, | download/upload times. Each time new data is needed for testing, the entire | that the system is built correctly according to its specifications. | | this issue is still unresolved, the potential impact on the schedule, the severity | | |
| | | | | | inefficiencies in data extraction | database must be extracted, which is time-consuming. CSEA is evaluating a SQL | o Recommendation: Implement a thorough verification process | | has been raised to high. | | |
| | | | | | programs, and long download/upload | replication strategy to replace the current process and has assigned two dedicated | for all data extraction and conversion methods, particularly the | | | | |
| | | | | | times. This could impact the project by | resources to identify and test this approach. Daily meetings with DDI and CSEA | Ascii to BCP script conversions. Establish checkpoints where the | | 8/30/24: The key decision to determine and finalize the method of test data | | |
| | | | | | increasing costs, compromising the | have been established to collaborate on this issue. The target for validating this | file counts and conversion accuracy are verified before moving to | | delivery is now anticipated for September and the outcome is now based upon | | |
| | | | | | quality of the overall solution, and | approach is July 31st. | subsequent phases of the project to avoid potential issues in | | the solution for the date/time issue and the packed binary fields. CSEA and | | |
| | | | | | | The static data collected from the data extract process projects a worst-case | later stages. | | Protech have worked diligently to clear the other issue of nulls. | | |
| | | | | | days during the cutover weekend, | scenario of 12 to 36 days to fully extract ADABAS data to the 374 flat files, | | | | | |
| | | | | | thereby extending the project timeline. | including downloading and uploading the files. This arises due to: 1) CSEA uses a | 2024.08.001.R2 - Validation of Extracted Data Consistency | | 9/30/24:There is a delay in the resolution of the production test data delivery | | |
| | | | | | | shared mainframe, 2) inefficiencies of data extraction programs, 3) | Standard(s): IEEE 1012-2016 Emphasis: Validation ensures | | method, as noted in the weekly status report. The datetime issue with the | | |
| | | | | | | download/upload times. The data extract process is central to the cutover | that the system meets its intended use and satisfies user needs. | | replicated SQL data is a key blocker, with the CSEA working to resolve this | | |
| 1 | | 1 | | | | activities completing over Fri/Sat/Sun. If not improved, CSEA may face 4/5 days | o Recommendation: Conduct end-to-end validation of the | | through Natural programs. This has the potential to delay critical testing | 1 | |
| | | 1 | | | | operational downtime for cutover weekend. | extracted data, ensuring that the SQL-to-SQL comparisons are | | phases, as it impedes the ability to test with accurate production data. The | 1 | |
| | | | | | | | consistent and match across systems (Protech and CSEA). Given | | date/time issue continues to be a blocker. Nulls and packed binary fields have | | |
| 1 | | 1 | | | | | the noted discrepancies, a validation step should be introduced | | been resolved. The UI refinement process has progressed, with 84% of the tasks | 1 | |
| | | | | | | | after each major extraction and conversion task (e.g., Task 18). | | completed. However, finalization and validation are still pending, and the | | |
| | | | | | | | This will confirm that the extracted data matches the expected | | schduling of the walkthrough of the UI Refinement Plan is underway. The | | |
| | | | | | | | output and is usable for further processing. | | Financial Test Deck (FTD) execution is still only 35% complete, and scenario | | |
| | | | | | | | | | execution is 17% complete, while not directly on the critical path, delays in the | | |
| | | | | | | | 2024.08.001.R3 - Risk Management for Binary and Ascii File | | FTD could become a future risk if unresolved issues persist. Batch testing is | | |
| | | | | | | | Handling | | progressing, with 31% of batch test execution complete. | | |
| | | | | | | | Standard(s): IEEE 1012-2016 Emphasis: Risk management is | | 2024.08.001.R1 (Verification of Data Extraction and Conversion): Open – | | |
| | | | | | | | integrated into the IV&V process to identify potential risks and | | Progress made but verification of Ascii to BCP scripts and checkpoints not fully | | |
| | | | | | | | implement mitigation strategies. | | implemented. | | |
| | | | | | | | o Recommendation: Assess the risks associated with the | | 2024.08.001.R2 (Validation of Extracted Data Consistency): Open – Partial | | |
| | | | | | | | conversion and handling of binary and Ascii files. Discrepancies in | | progress, but full end-to-end validation of extracted data is still pending. | | |
| | | | | | | | binary file counts and the use of converters for 27 files were | | 2024.08.001.R3 (Risk Management for Binary and Ascii File Handling): Open – | | |
| | | | | | | | discussed. It is recommended to perform risk analysis on these | | No mention of specific risk assessments for binary and Ascii file handling; | | |
| | | | | | | | conversions, ensuring that any potential data corruption or loss | | further analysis needed. | | |
| | | | | | | | during conversion is identified and mitigated. Consider | | 2024.08.001.R4 (Resource Management and Space Availability): Open – | | |
| | | | | | | | implementing additional testing and validation for these specific | | Ongoing evaluation of SQL replication strategy; resource concerns still active. | | |
| | | | | | | | files. | | 10/21/24 2024 00 001 P1 (Valification of Data Fictoration and Communication) | | |
| | | 1 | | | | | 2024.08.001.R4 - Resource Management and Space Availability | | 10/31/24 - 2024.08.001.R1 (Verification of Data Extraction and Conversion): Open – In Progress: Verification steps are underway with some checkpoints | 1 | |
| | | | | | | | IEEE 1012-2016 Emphasis: Resource management is crucial | | implemented. Critical issues, like date/time discrepancies, have been resolved. | 1 | |
| |] | | 1 | | | | for the successful execution of project activities. | | Checkpoints to verify file counts and conversion accuracy have been partially | I | |
| | | 1 | | | | | o Recommendation: The observation regarding potential space | | implemented, although more robust, automated checks are still needed. | 1 | |
| 1 | | 1 | | | | | risks should be taken seriously. Conduct a resource assessment to | | 2024.08.001.R2 (Validation of Extracted Data Consistency): Open – Partially | 1 | |
| 1 |] | | 1 | | | | ensure that there is sufficient storage and computing resources | | Implemented: SQL replication and extraction validations have progressed, with | I | |
| 1 | | | | | | | to handle the extraction, conversion, and processing of data. This | | critical issues such as date/time and packed fields now resolved. The October | 1 | |
| 1 | | 1 | | | | | should be done before the extraction process begins, with | | reports indicate that ongoing discrepancies in interface data and batch outputs | 1 | |
| |] | | 1 | | | | contingency plans in place in case of resource shortages. | | still require validation to confirm end-to-end consistency across systems. | I | |
| | | 1 | | | | | containgency plans in place in case of resource shortages. | | 2024.08.001.R3 (Risk Management for Binary and Ascii File Handling): Open – | 1 | |
| |] | | 1 | | | | | | In Progress: Some risk assessments have been completed, but specific | I | |
| 1 | | | | | | | | | evaluations for the binary and Ascii files are still needed. The packed field and | 1 | |
| | | 1 | | | | | | | date/time data issues were resolved, reducing some risk associated with binary | 1 | |
| 1 | | 1 | | | | | | | data. Additional validation and testing for converted files remain crucial to | 1 | |
| | | 1 | | | | | | | ensure data accuracy in other key areas. | 1 | |
| | | | | | | | | | 2024.08.001.R4 (Resource Management and Space Availability): Open - | 1 | |
| 1 | I | I | I | I | 1 | I | I I | | 202 11001002111 (110300100 Intallagement and Space Availability). Open | I | 1 |

| ASSESSMENT OBSERVATIO | ON TYPE | ORIGINAL SEVERITY | CURRENT SEVERITY | OBSERVATION | ANALYSIS | RECOMMENDATIONS | STATUS | STATUS UPDATE | CLOSED DATE | CLOSURE REASON |
|-----------------------|---------|----------------------|---------------------|---|---|---|---|--|-------------|----------------|
| AREA ID | TYPE | SEVERITY | SEVERITY | OBSERVATION | ANALTSIS | RECOMMENDATIONS | SIAIUS | Ongoing Evaluation: Resource constraints, particularly related to mainframe and storage capacity, are still an area of focus. The October updates highlighted that batch and interface testing are sometimes delayed due to dependency on shared mainframe resources and long runtimes for large batch jobs. Develop contingency plans to manage high-demand periods and alleviate mainframe dependency for smoother testing cycles. | CLUSED DATE | CLUSURE REASON |
| Technology 2024.03.00 | D1 Risk | Moderate | Moderate | for interface modifications after its deployment, which can lead to additional costs, delays, and disruption to the system. | CSEA's KEIKI system currently relies on a legacy cyberfusion system running on the State's mainframe for system file and data exchanges with multiple State of Hawai agencies. The timing of multiple agencies moving off the mainframe at different times will result in the need to modify KEIKI system interfaces after the system has been deployed. Until other State modernization projects are completed, the KEIKI project cannot perform server-based data exchanges and will need to continue to interface via the mainframe. In addition, as the KEIKI project involves integrating a modernized child support system with existing legacy systems, there may be other technological and architectural gaps that arise. These gaps can include differences in technology stacks, such as programming languages, database systems, and operating environments, as well as the absence of modern application programming interfaces (APIs) in the legacy systems. Based on the timing of concurrent State of Hawaii modernization projects and upgrades, the end-to-end testing of the KEIKI system may necessitate the undertaking of supplementary tasks, allocation of additional resources, and coordination efforts. | with the new Chief Data Officer. And also to meet with the EFS team to identify any potential impacts to CSEA and align with IT policies. | 5 | 04/30/24: CSEA organized a meeting with other Departments in April to exchange information regarding the status of their respective system modernization efforts, specifically those related to the shared mainframe and dependencies. 05/31/24: Accuity closed one recommendation as CSEA is coordinating regular meetings with impacted State of Hawaii agencies to monitor the status of their modernization projects and mainframe operations. CSEA is planning to develop an inventory of interfaces to share at an upcoming meeting with impacted Departments. 06/30/24: CSEA and Protech agreed to develop a list of interfaces categorized into three groups: 1) Axway (source: AWS vs. Mainframe), 2) Mainframe (group of interfaces on the mainframe with departments pointing to Axway), and 3) Cyberfusion. They also decided to share this list at the next monthly meeting with State Departments. IV&V will continue to monitor the coordination with other State of Hawaii modernization projects. 7/31/24: The Chief Data Officer and the EFS team have been contacted and will be meeting with CSEA. 8/30/24: ETS' new Chief Data Officer has been aligned as a key stakeholder and is in the process of focusing on data governance policies and interface concerns with the EFS team (2024.07.001.R1) IV&V will continue to monitor and update as the focus on policies and interface details with the EFS team, this effort will be ongoing through project Go-Live. 10/31/24: 2024.07.001.R1 (Alignment of Data Policies with Chief Data Officer) CSEA has conducted the recommended meetings and established alignment on data exchange policies and impact assessments, this recommendation can be closed. Continued coordination could be noted as a follow-up item rather than an open recommendation. 2024.03.001.R2 (Interfaces) Open/In Progress: Good progress has been made in identifying interfaces, and with continued focus on data acoordination and flexibility planning, we can further strengthen alignment with this recommendation. Ongoing efforts to secure reliable data an | | |

| ASSESSMENT | OBSERVATION | | ORIGINAL | CURRENT | | | | | | | |
|------------|-------------|------|----------|----------|--|---|--|--------|--|-------------|--|
| AREA | ID | TYPE | SEVERITY | SEVERITY | OBSERVATION | ANALYSIS | RECOMMENDATIONS | STATUS | STATUS UPDATE | CLOSED DATE | CLOSURE REASON |
| Process | 2024.06.002 | Risk | Moderate | Moderate | The project faces a significant risk of | Meetings have been held with Protech to discuss the data extraction costs. Protech | 2024.07.002.R1 – Continue negotiations with ETS to secure | Closed | 7/31/24: The SQL to SQL method for data extraction and transfer has been | 7/31/2024 | The SQL to SQL method for data |
| | | | | | incurring extensive costs for delivering | has engaged AWS for options, but AWS indicates the issue is billing-related, not | financial support for data delivery. | | confirmed. CSEA has addressed the issue of cost. | | extraction and transfer will be |
| | | | | | the necessary data to test the | technical. The cost of delivering data for testing is critical for the KEIKI project, but | Engage in discussions to find a feasible cost structure that | | | | used.CSEA has confirmed that the costs |
| | | | | | refactored KEIKI application, potentially | | aligns with project budgets. | | | | have been addressed. |
| | | | | | , , , | indicate the need to resolve the billing issue rather than technical challenges. | Ensure clear communication of cost concerns and impacts to | | | | |
| | | | | | and increased budget constraints. | Without a resolution, this issue could impact the project timeline and budget. | ETS. | | | | |
| | | | | | Despite discussions with Protech and | CSEA continues to engage ETS to negotiate a cost cap and explore alternative | | | | | |
| | | | | | AWS, the issue remains billing-related | solutions. | 2024.07.002.R2 – Explore alternative solutions with Protech and | | | | |
| | | | | | rather than technical, necessitating | | AWS. • Investigate potential cost-saving measures or alternative | | | | |
| | | | | | ongoing negotiations with ETS to | | technical approaches. • Seek AWS assistance to better | | | | |
| | | | | | determine financial responsibility. CSEA | | understand and manage billing concerns. | | | | |
| | | | | | has developed a second option to use a | | | | | | |
| | | | | | SQL to SQL transfer in to reduce the | | 2024.07.002.R3 – Improve performance of data extraction | | | | |
| | | | | | amount of federal funding needed for | | programs to minimize timing and associated costs. • Work with | | | | |
| | | | | | this piece of the contract. In the month | | Protech to identify and implement optimizations in the data | | | | |
| | | | | | of July testing will be conducted to test | | extraction process. | | | | |
| | | | | | the viability of this cost saving measure. | | | | | | |
| | | | | | A decision will be made at the end of | | | | | | |
| | | | | | July. With the new State CIO starting on | | | | | | |
| | | | | | August 15, decision-making could be | | | | | | |
| | | | | | further delayed into the Fall. | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

| ASSESSMENT | OBSERVATION | TVDF | ORIGINAL SEVERITY | CURRENT | OBSERVATION | ANALYSIS | RECOMMENDATIONS | STATUS | STATUS UPDATE | CLOSED DATE | CLOSURE REASON |
|------------|-------------|-------------|----------------------|----------|--|--|--|--------|---|-------------|--|
| Process | 2024.03.002 | Issue | Moderate | Moderate | Inadequate schedule and resource management practices may lead to | to the delay in the assessment validation which was completed in February. It is crucial for the Protech and CSEA project managers to both take active roles in tracking and monitoring project activities, especially delayed and upcoming tasks, to collaborate on ways to get the project back on track. Although the project metrics are showing a 17-day variance, some project tasks are delayed 1 to 2 months from the approved baseline including building the KEIKI database, developing system test scripts, UI design, UI development, code conversion, system test execution, etc. CSEA should have a clear understanding of | 2024.03.002.R1 – Based on the complexity of the KEIKI project, review and refine the schedule regularly with detailed tasks, realistic durations, and adequate resources. The project managers should meet weekly to discuss the project schedule, continue to identify detailed-level tasks based on high-level timelines, and identify schedule and resource related risks. The CSEA project manager should conduct independent reviews of the schedule and project metrics, proactively | | 04/30/24: Project managers started meeting regularly to review the project schedule. The project managers will do a deeper analysis of the upcoming technical tasks, and then recalibrate the project schedule in May. 05/31/24: Protech delivered a draft of the replanned project schedule and analysis for CSEA's feedback and approval. The revised schedule maintains the original Go-Live date. 06/30/24: Issue closed. The schedule was updated and the 17-day variance was successfully mitigated, ensuring the project remained on track. The project schedule continues to be discussed weekly. IV&V encourages the CSEA PM to conduct independed reviews of the schedule and project metrics. IV&V will continue to monitor progress made on schedule and resource management practices. | 6/30/2024 | The schedule was updated and the 17-day variance was successfully mitigated, ensuring the project remained on track. The project schedule continues to be discussed weekly. |
| Process | 2024.02.001 | Preliminary | N/A | N/A | Additional information is needed regarding Protech's program development and testing approach. | In February, Protech delivered the System Requirements Document and Test Plan which are still under review. CSEA already provided a number of comments for both deliverables requesting additional clarification or additional documentation. Both deliverables do not provide sufficient understanding of Protech and One Advanced's approach for the program development and testing phase. There needs to be a clearer mutual understanding of how Protech's development and testing approach will ensure that the new system and user interface will maintain the same functionality, data, and system interfaces as the old system. The System Requirements Definition deliverable is high-level documentation of items such as source code, data component, and interface tables but does not actually capture the required functionality using industry standard format for requirements. Documenting requirements is especially important for the development of the new front-end user interface (UI). The System Requirements Definition deliverable included a User Interface section but does not include sufficient information regarding UI requirements. Protech has another UI Refinement plan deliverable due in May 2024, however, it is unclear if UI requirements will be included in that deliverable. If system requirements will not be used to manage development of UI as well as replatforming and refactoring of code work, then it is important to understand how Protech and One Advanced are planning to manage and report on development progress. Additionally, without documented system requirements, testing will be even more critical for identifying gaps in or issues with functionality during the development process. CSEA also has a number of comments and questions on the Protech Test Plan deliverable. In addition to the System Test Plan, Protech is developing an Acceptance Test Plan (UAT Plan) deliverable due in April 2024 which may help to provide additional clarification of the comprehensive testing strategy and delineation of testing responsibilities betwe | | Closed | 03/31/24: Protech is planning on a presentation in April or May to explain how their testing approach will ensure that the new system and user interface will maintain the same functionality as the old system. Without documented requirements, it is still unclear how program development progress, testing, and acceptance will be managed and monitored. 04/30/24: Protech will present their testing approach in May. The presentation is important as test scripts are finalized, and system testing is approaching. 05/31/24: Protech's testing approach presentation was pushed back to June. The presentation is critical as test scripts are finalized and system testing begins in June. 06/30/24: Preliminary closed. CSEA acknowledged the risk associated with not having defined UI system requirements. Instead, the test scripts are used as the requirements. The teams collaborate closely and hold regular test meetings to ensure alignment and thorough testing. IV&V will continue to monitor the clarification of the program development and testing approach. | | CSEA acknowledged the risk of not having defined UI system requirements and addressed it by using test scripts as the requirements. Additionally, the teams collaborated closely and held regular test meetings to ensure alignment and thorough testing. This approach mitigates the risk by ensuring that the testing process is comprehensive and that any issues are promptly identified and resolved through ongoing communication and collaboration. |

| ASSESSMENT | OBSERVATION | | ORIGINAL | CURRENT | | | | | | | |
|------------|-------------|------|----------|----------|---|--|--|--------|--|-------------|---------------------------------------|
| AREA | ID | TYPE | SEVERITY | SEVERITY | OBSERVATION | | RECOMMENDATIONS | STATUS | STATUS UPDATE | CLOSED DATE | CLOSURE REASON |
| Process | 2024.01.001 | Risk | Moderate | Low | Ineffective project status meetings and | Weekly status reports are provided with a dashboard of the project status, high | CLOSED: 2024.01.001.R1 – CSEA should play an active role in | Closed | 02/29/24: A new recommendation was added and two recommendations | 6/30/2024 | Test reports were added to the weekly |
| | | | | | reports can lead to delayed decision- | | refining the project status report and providing topics for weekly | | were closed. Two recommendations were closed as CSEA and Protech worked | | status meetings. The report contains |
| | | | | | making, lack of accountability, and | | project meetings. | | together to improve project status reports to be more clear, meaningful, and | | testing and defect metrics. |
| | | | | | reduced morale. | information. Despite numerous data points, the weekly project status reports may | Contribute to the improvement of project meetings and reports | | relevant to the audience. The streamlined status reports are facilitating greate | • | |
| | | | | | | | that actively engage team members and highlight key | | understanding and allowing more time for meaningful discussion amongst | | |
| | | | | | | understanding of any delays, risks, issues, or action items, additional research and | | | project stakeholders. | | |
| | | | | | | analysis of past reports, review of the Microsoft Project schedule, and inquiry with | | | | | |
| | | | | | | project members is necessary. For example, late project deliverables may be listed | CSEA could solicit feedback prior to meetings so the team can | | 03/31/24: Although improvements were made to project status reports, they | | |
| | | | | | | as simply "in progress"; however, one is unable to determine how many additional | | | could be further improved by outlining delayed tasks and upcoming activities | | |
| | | | | | | days the deliverable was pushed back without checking the previous weekly status | | | to ensure stakeholders are adequately prepared. CSEA continued to refine | | |
| | | | | | | · · | CLOSED: 2024.01.001.R2 – Set clear objectives for meetings and | | success metrics to prepare for reporting which will begin next month. | | |
| | | | | | | | provide concise and relevant information that adds value. | | | | |
| | | | | | | | Meetings and reports without clear objectives can quickly turn | | 04/30/24: Accuity closed two recommendations. Project status reports | | |
| | | | | | | | into a one-way status update without any meaningful discussion | | continue to be refined and now clearly report tasks that have been rescheduled | | |
| | | | | | | | or clear understanding of project status, risks, and issues. | | from the previous week's reporting period. CSEA did not start reporting on | | |
| | | | | | | | Provide reports that are concise, relevant and clear to the | | success metrics in April as planned. | | |
| | | | | | | | audience. Only include charts and tables that provide value and | | | | |
| | | | | | | | present data in a format that helps provide meaningful | | 05/31/24: Accuity decreased the severity rating from Level 2 (Moderate) to | | |
| | | | | | | | information to move the team forward. | | Level 3 (Low). The CSEA PM presented some of the project's key success | | |
| | | | | | | | | | metrics at the May Steering Committee Meeting. High-level pre-delivery | | |
| | | | | | | | CLOSED: 2024.01.001.R3 - Additional quality metrics and project | | testing metrics were provided in May. | | |
| | | | | | | | success metrics should be added to project status reports. | | | | |
| | | | | | | | | | 06/30/24: Risk closed. As system testing started in June, the team started | | |
| | | | | | | | | | adding a Weekly Test Report. The report outlines the testing scope, the defects | | |
| | | | | | | | | | that were retested and validated, and gives a summary of the progress of all | | |
| | | | | | | | | | test cases. | | |
| | | | | | | | | | | | |
| | | | | | | | | | IV&V will continue to assess the effectiveness of project status reports and | | |
| | | | | | | | | | meetings. | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |
| | | | | | | | | | | | |

| | | | | CURRENT | | | | | | | |
|------------|-------------------|------|----------------------|----------|--|----------|---|--------|---|-------------|--|
| ASSESSMENT | OBSERVATION ID | TYPE | ORIGINAL SEVERITY | SEVERITY | OBSERVATION | ANALYSIS | RECOMMENDATIONS | STATUS | STATUS UPDATE | CLOSED DATE | CLOSURE REASON |
| Process | 2023.10.002 | Risk | Prelim | Moderate | Untimely project management responsibilities may impact effective project execution. | | address schedule comments. • Develop a detailed plan with assigned resources to complete project tasks. • Provide the appropriate detail of tasks, durations, due dates, milestones, and key work products for various parties. CSEA assigned tasks should also be clearly reflected in the project schedule. • Obtain agreement on the baseline schedule and then hold parties accountable for tasks and deadlines. CLOSED: 2023.10.002.R2 – Determine the root causes of delays and develop plans to address them. • Perform a root cause analysis including defining the problem, | Closed | 11/30/23: This was originally reported in the October 2023 IV&V Monthly Report as a preliminary concern but was upgraded to and rewritten as a risk this month with recommendations. The project is still challenged with insufficiently updating deliverables and continued delays in the proposed project schedule. 12/31/23: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). More rigor on foundational project management practices is needed to prevent further delays and increase the quality of project execution. The approved project schedule still lacks detailed tasks to adequately plan project resources and monitor project performance. Although the project schedule has some percentage completion, the process to monitor and calculate metrics is unclear. 01/31/24: Despite several meetings, there is still a need for a greater shared understanding of schedule concerns between Protech and CSEA. This risk will continue to be evaluated with the recent addition of Protech resources to improve the timeliness of project execution, a recommendation was added that project managers can adopt a more joint, collaborative approach to share and clearly delineate project management responsibilities. 02/29/24: The project schedule does not include all project tasks and is being updated to include more granular-level project activities. One recommendation was closed as Protech added additional project management resources. 03/31/24: Closed two recommendations as a new, separate observation with recommendations related to schedule and resource management was opened. Refer to observation 2023.03.002. Project managers should prioritize working closely together to assess upcoming activities, the impact of project delays, and determine if any changes are needed to the overall project timeline. 04/30/24: The CSEA project manager still needs to independently validate the variance and critical path. For monthly steering committee and project status meetings, it would be beneficial for CSEA to take a more active | 05/31/24 | Closed as the project managers are working more collaboratively to share and execute project responsibilities. |

| ASSESSMENT | OBSERVATION | | ORIGINAL | CURRENT | | | | | | | |
|------------|-------------|----------|--------------------|-----------------|--|--|--|--------|---|----------|--|
| Technology | 2023.12.001 | Positive | SEVERITY Moderate | SEVERITY N/A | | ANALYSIS Protech's partner, Advanced, worked closely with CSEA's technical SMEs and outlined a clear, well-defined process to collect and assess the KEIKI mainframe application in preparation for the migration and code conversion. Advanced's weekly status updates and follow-ups helped all stakeholders understand their roles, responsibilities, outstanding tasks, and status of activities. Their final assessment report was comprehensive, data-driven and insightful, and prepared the project team well as they begin the next phase of legacy code and data system migration. | RECOMMENDATIONS N/A | Closed | N/A | 01/31/24 | CLOSURE REASON Closed as this is a positive observation. |
| Technology | 2023.11.001 | Risk | Moderate | Moderate | Complex data system migration requirements, combined with incomplete documentation and the absence of a formalized process for noncode tasks, may lead to project delays, unmet contract requirements, and quality issues. | not properly planned and managed. The KEIKI system's incomplete documentation and multitude of jobs, workflows, interfaces, and interface files pose a risk of overlooking certain elements, making it challenging to track and validate migration requirements. The project lacks a formalized process for non-code tasks in the data system requirements collection, migration, and validation activities. The project has a formalized process for application code migration but lacks a clear process for gathering non-code and ancillary elements including hardware, software, interfaces, and batch files. The absence of a separate, formalized process and reliance on manual processes using Excel worksheets may result in data loss, poor quality, and technical issues affecting system performance and user experience. The SI's waterfall approach requires upfront gathering and definition of all requirements in a linear sequence. Late identification of data system migration requirements may result in insufficient time or budget to execute the migration properly. | A separate implementation plan should be clearly outlined, | | 12/31/23: CSEA appointed two dedicated Data System Migration Leads. It is unclear if Protech also appointed a dedicated lead. A clear plan is still missing, and CSEA documented a formal issue related to the lack of information coordination and redundant requests related to the data system migration requirements. 01/31/24: Risk closed as the inventory of non-code and ancillary elements including hardware, software, interfaces, and batch files was completed and will be validated as part of the technical architecture and system requirements documentation. | 01/31/24 | Risk closed as the inventory of non-code and ancillary elements was completed. |
| People | 2023.10.001 | Positive | N/A | N/A | The project team members are engaged and the environment between Protech and CSEA is collaborative. | The CSEA SMEs appear to be engaged in ongoing Assessment sessions and accountable for timely completing required tasks, providing information, and responding to questions. The project team members regularly seek feedback, input, and clarification in an open and respectful manner. The experience and knowledge of Protech team members combined with the dedication and high level of engagement from CSEA SMEs support the positive project team environment. | N/A | Closed | N/A | 11/30/23 | Closed as this is a positive observation. |

Appendix D: Comment Log on Draft Report



Comment Log on Draft Report

KROM Project: IV&V Document Comment Log





| ID# | Page # | Comment | Commenter's Organization | Accuity Resolution |
|-----|--------|---------------------------------------|--------------------------|--------------------|
| 1 | | No CSEA or Protech comments received. | | |
| 2 | | | | |
| 3 | | | | |
| 4 | | | | |
| 5 | • | | | |



FIRST HAWAIIAN CENTER

Accuity LLP

999 Bishop Street

Suite 2300

Honolulu, Hawaii 96813

- Р 808.531.3400
- ғ 808.531.3433

www.accuityllp.com



Accuity LLP is an independent member of Baker Tilly International. Baker Tilly International Limited is an English company. Baker Tilly International provides no professional services to clients. Each member firm is a separate and independent legal entity, and each describes itself as such. Accuity LLP is not Baker Tilly International's agent and does not have the authority to bind Baker Tilly International nor act on Baker Tilly International's behalf. None of Baker Tilly International, Accuity LLP, nor any of the other member firms of Baker Tilly International has any liability for each other's acts or omissions. The name Baker Tilly and its associated logo are used under license from Baker Tilly International Limited.

© 2024 Accuity LLP. This publication is protected under the copyright laws of the United States and other countries as an unpublished work. All rights reserved.