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

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July 17, 2025

The Honorable Ronald D. Kouchi President of the Senate and Members of the Senate Thirty-Third State Legislature State Capitol, Room 409 Honolulu, Hawai'i 96813 The Honorable Nadine K. Nakamura Speaker and Members of the House of Representatives Thirty-Third State Legislature State Capitol, Room 431 Honolulu, Hawai'i 96813

Aloha Senate President Kouchi, House 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 ten days of receiving the report, please find attached the report the Office of Enterprise Technology Services received for the State of Hawai'i, Department of Human Services, Systems Modernization Project.

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

Sincerely,

Christine M. Sakuda 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: May 1 – 31, 2025

Submitted: June 16, 2025



Overview

- Executive Summary
- IV&V Findings and Recommendations
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Executive Summary

Executive Summary



May was a critical month for the BES project. The ASI is in the final stages of developing BES and getting ready to demonstrate the system to DHS, with Systems Integration Testing set to start in mid-June 2025. Project risks with the potential to impact the timeline and or scope of the BES Pilot Release include:

- **Security**: Progress continued with the implementation of the Secure Enclave and Email microservices. However, the project team faces challenges in resolving security findings within required timeframes. Additionally, federal approval for BES data sources has not been obtained, posing a risk of delayed implementation.
- Requirements Management: The ASI may not have a complete and accurate Requirements Traceability Matrix (RTM) ready for DHS review before the start of SIT as planned (per project issue 65). The ASI states that the RTM is not contractually required until prior to the start of UAT. Working sessions were conducted during the final week of May 2025 between ASI and DHS to address contract requirement status and data accuracy issues. The RTM is critical as it ensures clear traceability of contract requirements through the Design, Development, Testing, and implementation phases. Failure to finalize the RTM before SIT could lead to potential rework, missing functionality, increased costs, and schedule delays.
- **Testing:** Weekly meetings continued to clarify progress on UAT defect resolution from the prior release. Discussions also focused on how these defects and INT defect categorization will affect meeting DHS approval criteria for starting SIT.
- Interfaces: The ASI reported they have performed technical testing on seven of the twenty-one interfaces. Little time remains to create test scripts and conduct Integration Testing for the remaining interfaces prior to the start of SIT in mid-June 2025.

DHS and the ASI resumed preparing for Pilot by meeting to discuss the data conversion strategy during pilot to effectively manage clients moving into and out of the Pilot area. These sessions include DHS Pilot site staff to aid in a smooth transition. Organizational Change Management and Training activities will also resume in the near future to prepare project communications, plan and inform the operations team, prepare for User Acceptance testing and the Pilot phase.

Mar	Apr	May	Category	IV&V Observations	
M	M	M	Project Management	The ASI continued to coordinate several working sessions with DHS to discuss concerns on Data Conversion, and Requirements management in preparation for SIT.	

Executive Summary

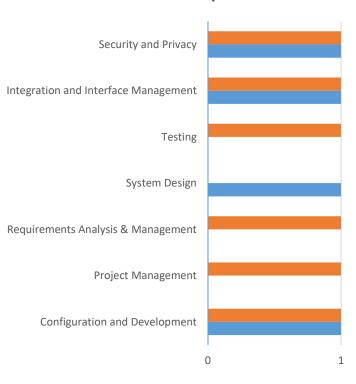


Mar	Apr	May	Category	IV&V Observations
L	L	L	System Design	The ASI extended the deadline for DHS to review the BI-10 Functional and System Design and BI-11 Data Integration and Interface Design deliverables at DHS' request. The BI-14 Technical Designs deliverable was provided to DHS for review and approval .These are major and extensive project deliverables for the ASI and DHS to ensure that all design decisions are thoroughly documented.
M	M	M	Configuration and Development	Additional functionality for HARI conversion for Pilot has been added to the development effort, which could impact resources fully assigned to existing workloads.
L	L	L	Integration and Interface Management	DHS submitted the FNS User Access Request Form, and FNS approved access to the eDRS interface. No progress was made during the month to define and execute physical testing of interfaces, which may impact ASI's ability to be ready for SIT testing in June.
M	M	M	Testing	The resolution of defects from the previous UAT cycle continued. The ASI and DHS met to clarify expectations for the number of defects that can be open when INT testing has completed, and if carryover UAT defects from the prior release will be included.
M	M	M	Security and Privacy	The ASI continues to make progress on security compliance efforts, completing the validation of SSP implementation statements for six of the twenty control families and advancing policy documents. Ongoing development work on the Secure Enclave and data conversion testing is steadily moving forward while some technical issues and testing are being worked on. This development completion is required to finalize the SSP controls.
M	M	M	Requirements Analysis & Management	The ASI continue working sessions throughout the month with DHS, FNS and IV&V-focused on addressing outstanding requirement updates – which are required to generate an accurate Requirements Traceability Matrix (RTM) report.



As of the May 2025 reporting period, PCG is tracking 10 open findings (6 risks, 4 issues) and has retired 81 findings. Of the 9 open findings, 6 are Medium, and 4 are Low.

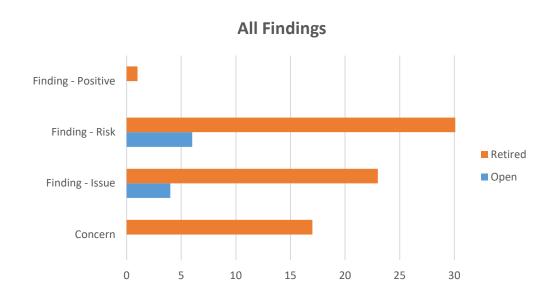
Open Risks & Issues







The following figure provides a breakdown of the 91 IV&V findings (positive, risks, issues, concerns) by status (open, retired).





Findings Opened During the Reporting Period

#	Finding	Category
	None	



Findings Retired During the Reporting Period

#	Finding	Category
	None	



Preliminary Concerns Investigated and Retired During the Reporting Period

#	Finding	Category
	None	



Project Management

#	Key Findings	Criticality Rating
74	Issue – A BES Project schedule based on inaccurate estimations diminishes effective planning and resource management, which could result in late deliverables, cost increases, and a late go-live. The BES development work is scheduled to complete on June 13, 2025 and System Integration Testing (SIT) is planned to begin on June 23, 2025. The ASI, DHS and IV&V will continue to closely monitor the schedule for undocumented risks as the project moves into a critical testing phase next month along with the Organizational Change Management (OCM) and Training workstreams restarting.	M

Recommendations	
 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for DHS. 	In Process
 ASI develop a mitigation plan for minimal amount of slack time between development completion and start of SIT. 	In Progress



System Design

#	Key Findings	Criticality Rating
	Risk – The planned BES infrastructure is complex which could be difficult to implement and maintain and could lead to schedule/cost impacts.	
7:	The BES system currently relies on services provided by a shared DHS platform. Any changes to these services could increase the complexity of the overall infrastructure and require changes to the BES system, which could negatively impact the BES project schedule. The shared platform vendor has notified the project that they will be replacing both the identity management shared service (IDCS) as well as the postal address verification service (Loqate) which will require BES system changes. It remains unclear whether this will impact the project critical path.	L

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



Configuration and Development

#	Key Findings	Criticality Rating
70	Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution.	L
	No material update for this reporting period.	

Recommendations	
 ASI adhere to plans for configuration management as documented in BI-6 DDI Plan, Section 5.2 and clarify details and/or any changes with DHS. 	In Process
 ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track. 	In Process



Configuration and Development

#	Key Findings	Criticality Rating
80	Issue – Development delays have negatively impacted the project schedule and delayed go-live. DHS stated that the ASI had not accounted for the conversion of data for one legacy system (HARI) for Pilot and the new scope of work will need to be added to the baselined schedule. It remains unclear whether this scope of work will impact the critical path given previous challenges with development velocity.	M

Recommendations	Progress
• ASI provides DHS with the time needed to effectively evaluate the software demonstrations (demos) and elicit productive design discussions with DHS attendees during each demo.	In Process
 IV&V recommends the project closely monitor progress on the customer correspondence CR and create a mitigation strategy to avoid delays. 	In Process



Integration and Interface Management

#	Key Findings	Criticality Rating
93	Risk – Due to the lack of physical and technical (Transport Layer) testing of the interfaces and data transfer failure, conditions may exist with data format, boundaries, and dependencies. These failures may result in intermittent and hard-to-isolate problems or errors. No progress was made during this reporting period. Of the twenty-one interfaces, 7 are reported as complete with 14 outstanding. The ASI plans to create the test scripts in JIRA for the fourteen interfaces prior to SIT start (6/23/2025). There is little time left to prepare and perform the tests effectively.	

Recommendations	
API interfaces should be tested for failure conditions during connection and transfer operations.	In Process
FTP and file interfaces should be tested for data and file integrity.	In Process
 Test data fields for system impacts resulting from data that is poorly formatted, out of range, or other unexpected data transmission errors. 	In Process



Integration and Interface Management

#	Key Findings	Criticality Rating
	Risk - Delays in getting FNS approval to use the eDRS interface may result in not having this ready for SIT, delaying access to this functionality	
107	DHS submitted and received FNS approval for the FNS-674 User Access Request form, which grants access to the USDA's Food and Nutrition Service systems. The ASI is actively working to integrate the APIs with the BES system. Ongoing integration activities will be monitored through regular test readiness updates.	M

Recommendations	
 Define a deadline for approval in coordination with FNS and document a mitigation strategy, such as simulated data testing, if delays persist. 	In Process
 Escalate Form #674 approval through formal project and executive channels to resolve the delay. 	In Process
Communicate the dependency's impact on SIT and compliance risk to all key stakeholders.	In Process



Testing

	#	Key Findings	Criticality Rating
		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.	
		As of May 29, 2025, the vendor continues to resolve defects from the previous UAT testing cycle. Below are the stats of defects in Ready for UAT, In UAT, Rejected, and other statuses (pending resolution).	
8	33	Ready for UAT- 166 defects (40 high, 89 medium, 37 low) In UAT - 26 defects (13 high, 3 medium, 10 low) Rejected - 28 defects (11 high, 16 medium, 1 low) Pending - 24 defects (8 high, 12 medium, 4 low)	M
		Looking ahead, System Integration testing (SIT) is scheduled to commence in June 2025. Any development and defect resolution delays may delay testing and potentially push back the go-live date.	

Recommendations	Progress
 DHS and ASI revisit the testing approach to prioritize completion of remaining test activities and conduct comprehensive System Integration testing (SIT) to minimize defect leakage to User Acceptance Testing (UAT). 	In Progress
 ASI assesses the potential impact of the large number of unresolved defects on future development efforts, ensuring a more robust and efficient development process. 	Complete
 ASI develop and implement a revised testing approach to improve the completeness and thoroughness of future testing cycles. 	Complete



Security and Privacy

#	Key Findings	Criticality Rating
	Issue – The lack of technical documentation may lead to incorrect implementation statements or delay the System Security Plan (SSP).	
82	Throughout May, the ASI's Security Team continued performing SSP Control implementation validation with the DevOps team. They have completed validation against the deployed system for six out of twenty control families. The ASI has submitted fourteen policies to DHS for approval; four policies are currently undergoing peer review within the ASI, and two policies are presently under QA review with the ASI. The Secure Enclave continues to progress as the ASI worked to resolve correspondence issues and completed the implementation of the email microservice, which remains to be tested. The completion of the Secure Enclave will allow the Project to finalize related technical documentation that supports the SSP.	L

Recommendations	Progress
Collaborate and communicate with SSP authors about when reliable and correct documentation will be available.	In Process
 Include the Secure Enclave within the work breakdown structure along with the known tasks related to the IRS Assessment to continue receiving FTI in BES. 	In Process



Security and Privacy

#	Key Findings	Criticality Rating
	Risk – Critical and high vulnerability and configuration scan findings are not remediated within the documented timeframes, potentially impacting the project schedule and causing delays.	
10	As of May 28th, 2025, BES had 30 critical findings in an open state outside the 15-day remediation timeframe, and 12 critical findings were within the timeframe. BES had 53 high-rated findings in an oper state outside the 30-day remediation timeframe, and 11 high-rated findings were within the timeframe. A stated last month, the ASI has noted that several environments have been shut down for cost savings. The servers that need patching will be addressed when they are brought back online. The Plan of Actions and Milestones (POAMs) remain open until all vulnerable servers have been remediated.	3

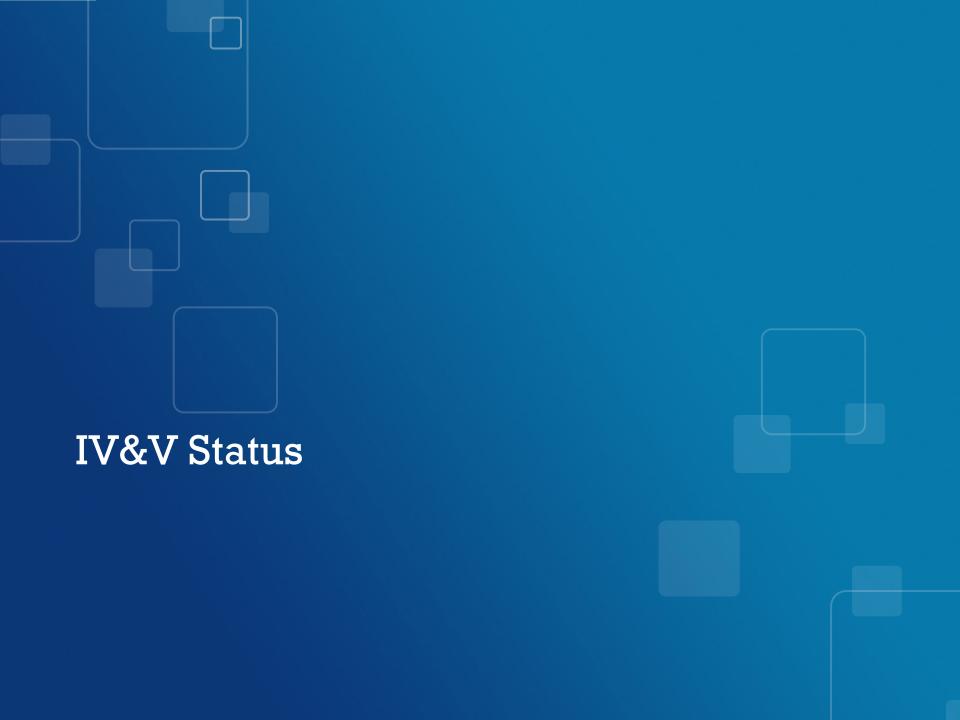
Recommendations	Progress
Implement an escalation process to involve senior leadership if deadlines are missed.	In Progress



Requirements Analysis & Management

#	Key Findings	Criticality Rating
	Risk - The lack of an effective way to validate BES requirements could lead to project delays and unfulfilled user needs if DHS later identifies unmet contractual requirements.	
94	The ASI continues to make progress to accurately list the contract requirements along with the associated traceability data in JIRA. During the Bi-Weekly BES CCB meeting on 5/28/25, the ASI noted that per the contract the BI-21 deliverable is to be completed before entering UAT. Per the current schedule, this deliverable will be submitted to DHS on 12/23/25. DHS and IV&V both stated there was an issue log regarding the need for it to be completed before SIT and by doing so this will allow DHS and IV&V to complete validation of all requirements before entering SIT. It is best practice to create the RTM framework at the beginning of the project, with continual updates during the development, in effect creating a living document that would be available to DHS at any point in time. The ASI will add to the agenda for the next meeting to revisit the BI-21 they are currently working on. This was previously shown in April with the revised layout. Currently, it is not complete, and all requirements have not yet been entered. Without adequate validation of requirement traceability, this could lead to requirements not being fully met or missed, resulting in project delays.	M

Recommendations	Progress
 Develop a document that provides DHS with a feasible and effective way to map contract requirements to passed test cases, and, per the BI-19 (Complete and Final Test Plan),"Maps the implementation, functional and technical requirements to the test cases and test scripts". 	In Process
 Ensure test scripts thoroughly and comprehensively test the system to assure each requirement has been fully met. 	In Process
 Develop a deliverable that provides an audit trail for changes to the requirements from the contract such as obsoleted requirements, when that decision was made, and the change requests. 	In Process
 Provide weekly updates about the clean-up efforts in JIRA regarding incorrect statuses of epics, use case, and requirements. 	In Process



IV&V Engagement Status



IV&V Engagement Area	Mar	Apr	May	Comments
IV&V Budget				
IV&V Schedule				
IV&V Deliverables				PCG submitted the final April IV&V Monthly Status Report.
IV&V Staffing				
IV&V Scope				

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

IV&V Activities



- IV&V activities in the May reporting period:
 - Completed April Monthly Status Report
 - Ongoing Review the BES Project Artifacts and Deliverables
 - Ongoing Attend BES Project meetings, (see <u>Additional Inputs</u> pages for details)
 - Ongoing Review available ASI contracts and contract amendment documentation
- Planned IV&V activities for the June 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-05 Project Schedule	05/06/2025, 05/13/2025, 05/20/2025, 05/27/2025	N/A
BES 1.0 – BI-10 Functional and System Design	4/16/2025	N/A
BI-02 Project Status Report	05/06/2025, 05/13/2025, 05/20/2025, 05/27/2025	N/A
BES 1.0 – BI-11 Data Integration and Interface Design Deliverable	4/16/2026	N/A

Additional Inputs – Artifacts



Artifact Name	Artifact Date	Version
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	April 2025	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
ADA dashboard	N/A	N/A
Jira Requirements Details	N/A	N/A
Jira Testing Lists	N/A	N/A
INT Testing Dashboard	N/A	N/A
Waterfall Methodology Plan	N/A	N/A

Additional Inputs



Meetings and/or Sessions Attended/Observed:

- 1. IV&V Team Meeting 5/5/2025, 5/12/2025, 5/19/2025, 5/21/2025, 5/27/2025, 5/29/2025
- 2. IV&V/ASI March Pre-draft Review 5/5/2025
- 3. HI DHS BES March Draft IV&V Report Review 5/12/2025
- 4. Bi-Weekly DHS BES PMO/IV&V Check-in 5/8/2025, 5/22/2025
- 5. Bi-Weekly DHS and IV&V Touch Base 5/13/2025, 5/27/2025
- 6. Weekly BES Infrastructure meeting 5/2/2025, 5/9/2025, 5/16/2025, 5/23/2025, 5/30/2025
- 7. Weekly Client BES 2023 Project Status Meeting 5/7/2025, 5/21/2025
- 8. Security Touchpoint 5/7/2025, 5/14/2025, 5/21/2025, 5/28/2025
- 9. (Externa(I) Weekly Interfaces Touchpoint 5/5/2025, 5/12/2025, 5/19/2025
- 10. (External) Bi-weekly BES CCB Meeting 5/14/2025, 5/28/2025
- 11. (External) C!A Current Weekly Checkpoint 5/13/2025
- 12. (External) BES M&O Working Group 5/21/2025
- 13. (External) Weekly BES Testing Workgroup Meeting 5/22/2025, 5/29/2025
- 14. (External) BES: FNS Connect 5/1/2025
- 15. (External) BES Data Conversion Discuss Absent Parent Two Parent Household and 1303 Form 5/5/2025
- 16. (External) HARI/BES: OP Claims Conversion 5/9/2025, 5/23/2025
- 17. (External) BES Data Conversion Discuss How to Convert Lump Sum 5/19/2025





Appendix A – IV&V Criticality Ratings

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

Appendix B – Findings Log



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

Appendix C – Acronyms and Glossary



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



Appendix C – Acronyms and Glossary

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



Appendix C – Acronyms and Glossary

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

Appendix D – Background Information



Systems Modernization Project

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

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

Systems Modernization IV&V Project

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

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

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

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

Appendix D – Background Information



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

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

PCG's Eclipse IV&V® Technical Assessment Methodology

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

IV&V Assessment Categories for the BES Project

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

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

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Solutions that Matter