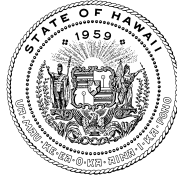


JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA



KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALU HANA LAULĀ

CHRISTINE M. SAKUDA
CHIEF INFORMATION OFFICER
LUNA 'ENEHANA

STATE OF HAWAII | KA MOKU'ĀINA O HAWAII
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWÉ LAULĀ
OFFICE OF ENTERPRISE TECHNOLOGY SERVICES | KE'ENA HO'OLANA 'ENEHANA
P.O. BOX 119, HONOLULU, HAWAII 96810-0119

November 26, 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,

A handwritten signature in blue ink, appearing to read "CSakuda".

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: October 1 – 31, 2025

Submitted: November 17, 2025

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](#)



Solutions that Matter

The background is a solid blue color. It features several abstract geometric elements: a cluster of overlapping squares and rectangles in various shades of blue (light, medium, and dark) in the upper-left corner; a single light blue square with a thin white border in the center-left, partially overlapping the text; and a few more squares and rectangles in the lower-right area, some with thin white lines extending from them.

Executive Summary

Executive Summary



The BES project team began design work on the new change requests (CRs) that are needed to align to the FNS Policy mandates. DHS and the ASI continue discussions on prioritizing deferred functionality for future enhancement work. The project team continues to execute System Integration Testing (SIT), while ramping up work in Organizational Change Management (OCM), Implementation Readiness, and Training to prepare for the Pilot and Statewide go-live.

The IV&V team identifies the current primary areas of risk for the project as Requirements Management, Testing, and Project Management.

Requirements Management:


- Significant work remains for both the ASI and DHS to complete their work to finalize all requirement refinement work, with 392 requirements still not mapped at the end of the reporting period.
- Additional work required to complete the revised SIRT documentation required by FNS is impacting requirements work overall and delaying the planned interim delivery of the RTM (November 3rd) for at least two weeks.

Testing:

- The Velocity of testing continued to slow down in the reporting period
- DHS remains concerned about the progress in testing, with many test cases being blocked from execution



















Project Management:

- The ASI and DHS agreed to delay the start of User Acceptance Testing (UAT) to provide additional time to complete work on the new federally mandated Change Requests for the One Big Beautiful Bill (OB BB), also delaying SIT, Pilot, and the Statewide implementation. A new project schedule or funding solution that reflects these delays had not been finalized as of the end of the reporting period.

Aug	Sept	Oct	Category	IV&V Observations
			Project Management	The additional, federally mandated requirements that must be included in BES solution have impacted the project and will require a revised schedule to include this new work. Other schedules on the project, such as Maintenance and Operations (M&O) work, are also impacted, which is causing challenges in planning M&O work with DHS.

Executive Summary



Aug	Sept	Oct	Category	IV&V Observations
			System Design	The ASI hosted a second meeting to review the Online Help process, presenting changes made to the process based on the feedback from DHS. With the revised process, DHS provided its approval to proceed with implementing the Online Help leveraging Claude AI. It will be a considerable effort to develop the online help pages and then integrate with the BES application, but the ASI is confident they will have completed it by the start of UAT. Additionally, JAD sessions have started for the new change requests, with good collaboration between the ASI and DHS.
			Configuration and Development	DHS and the ASI agreed to delay the start of UAT, Pilot and Statewide Implementation to allow time to complete development of all change requests. IV&V is working with the ASI to get clarification on completing implementation of configuration management, which must be in place when the Pilot starts.
			Integration and Interface Management	The execution of technical interface testing made solid progress during the reporting period. If the ASI can keep this pace up and maintain the same low ratio of defects to executed test cases, the ASI is confident they can complete this testing by the end of SIT.
			Testing	About 30% of remaining SIT tests are blocked in critical areas such as Eligibility and SSP, which also account for the largest share of unexecuted tests. Furthermore, only one-third of end-to-end (E2E) tests have passed, signaling potential issues with overall system readiness and stability.
			Security and Privacy	BES had 11 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 1 critical finding was within the timeframe. BES had 27 high-rated findings in an open state outside the 30-day remediation timeframe, and 29 high-rated findings were within the timeframe.
			Requirements Analysis & Management	The ASI's interim RTM delivery, originally scheduled for 11/3/25, is delayed by up to two weeks due to prioritization of the System Integration Report Tool (SIRT) project revision and 392 requirement still needing to be mapped to use cases. This delay reduces the time available for the project team to review and validate the BES system includes all contractually required functionality.



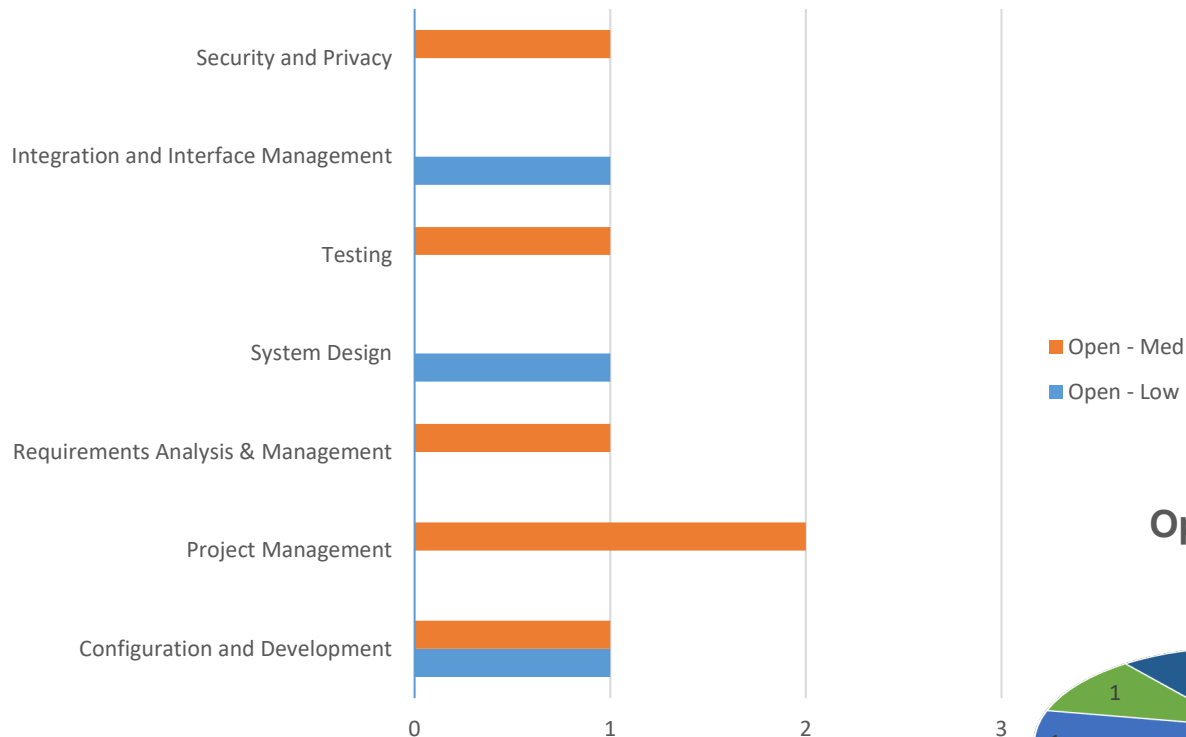
IV&V Findings and Recommendations

IV&V Findings and Recommendations

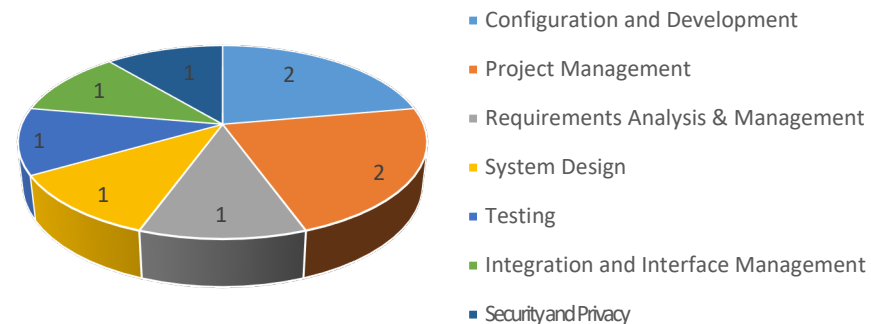


As of the October 2025 reporting period, PCG is tracking 9 open findings (7 risks, 2 issues) and has retired 84 findings. Of the 9 open findings, 6 are Medium, and 3 are Low.

Open Risks & Issues



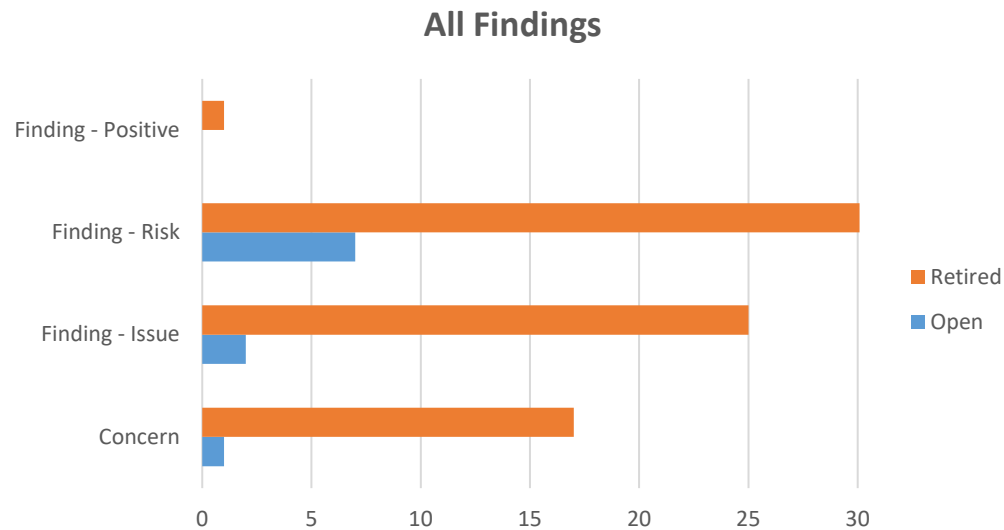
Open Risks & Issues by Category



IV&V Findings and Recommendations



The following figure provides a breakdown of the 94 IV&V findings (positive, risks, issues, concerns) by status (open, retired).



IV&V Findings and Recommendations



Findings Opened During the Reporting Period

#	Finding	Category
110	<p>Risk: Medium - The US Federal Government Shutdown may delay the BES project</p> <p>Observation:</p> <p>The BES Project relies on collaboration, funding, guidance, and approvals from Food and Nutrition Services (FNS). FNS staff are furloughed and unavailable to provide critical input, oversight, and decision-making support. Additionally, DHS priorities may change due to other critical and time-sensitive federal and State Policy changes that may require team members to be reassigned to other DHS mission-critical work.</p> <p>Significance:</p> <p>The absence of FNS on the BES Project may lead to:</p> <ul style="list-style-type: none">• Inability to confirm federal policy interpretations which may result in incorrect or incomplete requirements.• Possibility that the BES system may not meet FNS expectations, potentially jeopardizing FNS concurrence to enter Pilot and funding.• Rework once the government reopens, increasing costs and resource strain.	Project Management

Recommendations	Progress
• Document all assumptions made in the absence of FNS input to facilitate future validation	New
• Identify alternative paths or temporary solutions to maintain progress while minimizing rework.	New
• Continue to communicate with State Executive leadership to communicate and gain support for decisions.	New
• Establish and maintain a list of FNS questions/updates, allowing DHS to quickly bring FNS current on project status and expedite items requiring FNS input when the government reopens.	New

IV&V Findings and Recommendations



Findings Opened During the Reporting Period

#	Finding	Category
109	<p>Risk: Medium - Lack of a current BES Maintenance & Operations (M&O) Schedule may Impact the ability of DHS and the ASI to manage the M&O work effectively</p> <p>Observation:</p> <p>The project team is executing without a current Maintenance & Operations (M&O) schedule that aligns with the planned pilot and statewide go-live implementation timelines. The aged M&O schedule does not reflect recent changes in milestones, resource assignments, or operational readiness activities necessary for a smooth transition to production. Additionally, DHS is unable to determine when resources are needed for DDI activities that may overlap with M&O tasks, which may lead to resource constraints. The ASI has stated multiple times that the schedule is being updated, per DHS's repeated requests over the last couple of months. Additionally, ASI leadership of M&O has changed multiple times, which may also impact maintenance of the M&O schedule once reestablished.</p> <p>Significance:</p> <p>Failure to execute to a current M&O schedule may result in:</p> <ul style="list-style-type: none">• Inability for DHS and/or the ASI to effectively manage staff resources for both the DDI and M&O activities and tasks• Inadequate planning and preparation of the operations teams for pilot and go-live support.• Missed or delayed execution of critical readiness activities such as environment setup, training, UAT testing, and support planning.• Increased probability of service disruptions, user dissatisfaction, and stakeholder impact during implementation.	Project Management

IV&V Findings and Recommendations



Findings Opened During the Reporting Period

#	Finding	Category
109	Risk - Lack of a current BES Maintenance & Operations (M&O) Schedule May Impact the ability to manage the M&O work effectively - Continued	Project Management

Recommendations	Progress
• Update the M&O schedule to reflect current project timelines, resource commitments, and operational readiness activities based on estimates developed by the staff that will perform that work.	New
• Establish a formal process for periodic review and validation of the M&O schedule with all relevant stakeholders.	New
• Ensure the M&O schedule is integrated into the overall DDI project schedule and implementation readiness plans to show overlap of resource needs, tasks and activities.	New
• Maintain alignment between development, operations, and DDI project management teams by creating cross-functional meetings that include team members from each silo to ensure consistent, timely communication thereby aiding in the change management processes.	New

IV&V Findings and Recommendations



Findings Retired During the Reporting Period

#	Finding	Category
82	<p>Issue – The lack of technical documentation may lead to incorrect implementation statements or delay the System Security Plan (SSP).</p> <p>IV&V is retiring this finding based on the review of the updated System Security Plan (SSP), published on September 30th, 2025. As a result of additional documentation becoming available over the past year and completing the SSP Control Implementation validation, the ASI Security Team was able to fully update the SSP. The update reflects changes in the system and removes inaccuracies introduced during the early stages of SSP authoring, such as the system's design.</p>	Security and Privacy

IV&V Findings and Recommendations



Preliminary Concerns Investigated During the Reporting Period

#	Finding	Category
108	<p>Preliminary Concern - Unplanned federally mandated system requirements could lead to project delays and increase the project budget.</p> <p>The Food and Nutrition Services (FNS) organization is now unable to provide some interpretations on the required policy mandates due to the government shutdown, but DHS/ASI are continuing to move forward with those changes that are fully defined.</p>	Requirements Analysis & Management

IV&V Findings and Recommendations



System Design

#	Key Findings	Criticality Rating
73	<p>Risk – The planned BES infrastructure is complex, which could be difficult to implement and maintain, and could lead to schedule/cost impacts.</p> <p>Some defects reported during SIT have root causes in the stability of the BES infrastructure. The ASI states that the issues with shared resources and Bindplane software that occur in testing environments should not be present in production. However, IV&V has not yet been provided with artifacts or project documentation to validate that these issues will not materialize in UAT or Production environments.</p>	

Recommendations	Progress
<ul style="list-style-type: none">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
<ul style="list-style-type: none">The project team work to establish strong governance over the utilization and maintenance of various tools/components.	In Process
<ul style="list-style-type: none">ASI allot time in the schedule to conduct proof of concepts to assure infrastructure components work as expected.	In Process
<ul style="list-style-type: none">ASI maintain a detailed schedule for DevOps implementation tasks to avoid unexpected delays that could delay project milestones and the critical path.	In Process

IV&V Findings and Recommendations



Configuration and Development


#	Key Findings	Criticality Rating
70	<p>Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution.</p> <p>Additional information was requested from the ASI regarding progress in defining and implementing configuration management for BES, but as of the end of the reporting period no additional status information was provided.</p>	A green circle with a white 'L' inside, indicating a Low Criticality Rating.

Recommendations	Progress
<ul style="list-style-type: none">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
<ul style="list-style-type: none">ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track.	In Process

IV&V Findings and Recommendations



Configuration and Development

#	Key Findings	Criticality Rating
80	<p>Issue – Development delays have negatively impacted the project schedule and delayed go-live.</p> <p>It remains unclear if any development issues may delay the project, however additional work for change request (CR) 2025-040 ABAWD and SNAP Work Requirements updates will not be completed until 1/26/2026, which is after the planned start for User Acceptance Testing (UAT). To avoid phasing-in this functionality after UAT has started, the ASI and DHS have agreed to delay the start of UAT - which will push out go-live for Pilot and statewide implementation.</p>	

Recommendations	Progress
<ul style="list-style-type: none">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
<ul style="list-style-type: none">IV&V recommends the project closely monitor progress on the customer correspondence CR and create a mitigation strategy to avoid delays.	In Process

IV&V Findings and Recommendations



Integration and Interface Management


#	Key Findings	Criticality Rating
93	<p>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.</p> <p>The ASI is executing physical and technical test scripts, with most tests passing. The ASI is planning to complete all Interface testing by the end of the overall SIT testing cycle.</p>	A green circle with a white 'L' inside, indicating a Low Criticality Rating.

Recommendations	Progress
• 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

IV&V Findings and Recommendations



Testing


#	Key Findings	Criticality Rating
83	<p>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.</p> <p>Approximately 30% of the outstanding SIT tests are blocked in key areas of Eligibility and SSP, which also represent the highest areas of remaining unexecuted tests. Additionally, only a third of end-to-end (E2E) tests have passed, raising concerns about system readiness, integrations between the BES Modules (Case Management, Application Management, Financial Management), and stability.</p> <p>Defects continue to be concentrated in problematic areas of Reports and SSP, which also represent the top areas of reopened defects this month.</p>	

Recommendations	Progress
<ul style="list-style-type: none">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 Process
<ul style="list-style-type: none">ASI test team provide a visual of progress of test case execution compared to current testing schedule.	In Process

IV&V Findings and Recommendations



Security and Privacy


#	Key Findings	Criticality Rating
106	<p>Risk – Critical and high vulnerability and configuration scan findings are not remediated within the documented timeframes, potentially impacting the project schedule and causing delays.</p> <p>As of October 31st, 2025, BES had 11 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 1 critical finding was within the timeframe. BES had 27 high-rated findings in an open state outside the 30-day remediation timeframe, and 29 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 14 critical findings and 33 high findings from 2024 are listed as deferred, which are part of the Oracle Cloud Infrastructure that Oracle is responsible for patching on a quarterly basis.</p>	

Recommendations	Progress
<ul style="list-style-type: none">Implement an escalation process to involve senior leadership if deadlines are missed.	In Process

IV&V Findings and Recommendations



Requirements Analysis & Management

#	Key Findings	Criticality Rating
94	<p>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.</p> <p>DHS and the ASI conducted five additional collaborative working sessions to continue reviewing contract requirements that remain untraced or unfulfilled. The objective is to ensure all project requirements are accurately mapped, supporting complete and reliable traceability within the JIRA tool used to generate the Requirements Traceability Matrix (RTM) deliverable. The ASI reported as of July 17, 2025, out of the 2,971 requirements for the project, a total of 741 unmapped requirements were identified that were not mapped properly. Of these unmapped requirements, 349 have been reconciled, with 392 that remain outstanding, primarily within the categories of Implementation, and Maintenance & Operations (M&O) requirements. The ASI planned to deliver an interim RTM on 11/3/25. The ASI reported that due to the System Integrity Review Tool (SIRT) project revision taking priority, it has caused delays, and the interim RTM will be delayed by up to two weeks. Any potential delays will minimize the time the project team has to review the RTM to verify that all necessary BES functionality and supporting components have been developed and will be validated during current and future testing phases.</p>	
















Recommendations	Progress
<ul style="list-style-type: none">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
<ul style="list-style-type: none">Ensure test scripts thoroughly and comprehensively test the system to assure each requirement is met.	In Process
<ul style="list-style-type: none">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
<ul style="list-style-type: none">Weekly reporting on clean-up efforts in JIRA regarding incorrect statuses of epics, use case, and requirements.	In Process




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IV&V Status

IV&V Engagement Status



IV&V Engagement Area	Aug	Sept	Oct	Comments
IV&V Budget				
IV&V Schedule				
IV&V Deliverables				PCG submitted the final September IV&V Monthly Status Report.
IV&V Staffing				
IV&V Scope				

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



- IV&V activities in the October reporting period:
 - Completed – September Monthly Status Report
 - Ongoing – Review the BES Project Artifacts and Deliverables
 - Ongoing – Attend BES Project meetings (see [Additional Inputs](#) pages for details)
 - Ongoing – Review available ASI contracts and contract amendment documentation
- Planned IV&V activities for the November 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	10/01/2025, 10/08/2025, 10/15/2025, 10/22/2025, 10/29/2025	N/A
BI-02 Project Status Report	10/01/2025, 10/08/2025, 10/15/2025, 10/22/2025, 10/29/2025	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
R0.13 SIT Defect Dashboard	N/A	N/A
Interface Dashboard – Confluence page	N/A	N/A
Jira Requirements Details	N/A	N/A
Jira Testing Lists	N/A	N/A
BES R0.13 System Testing Results - CRs and Pending Epics	N/A	N/A
BES R0.13 System Testing Results - Core	N/A	N/A
Batch Defect Dashboard	N/A	N/A
Reporting Defect Dashboard	N/A	N/A



Meetings and/or Sessions Attended/Observed:




1. IV&V Team Meeting – 10/6/2025, 10/14/2025, 10/20/2025, 10/27/2025
2. HI DHS BES June Draft IV&V Report Review – 10/14/2025
3. Weekly BES Infrastructure meeting – 10/3/2025, 10/10/2025, 10/17/2025, 10/24/2025, 10/31/2025
4. Weekly Client BES 2023 Project Status Meeting – 10/1/2025, 10/8/2025, 10/15/2025, 10/22/2025, 10/29/2025
5. Security Touchpoint – 10/1/2025, 10/8/2025, 10/15/2025, 10/22/2025, 10/29/2025
6. (External) Weekly Interfaces Touchpoint – 10/6/2025, 10/20/2025, 10/27/2025
7. (External) Bi-weekly BES CCB Meeting – 10/1/2025, 10/8/2025, 10/15/2025, 10/22/2025, 10/29/2025
8. (External) CIA Current Monthly Checkpoint – 10/7/2025
9. (External) BES M&O Working Group – 10/1/2025, 10/8/2025, 10/15/2025, 10/22/2025
10. (External) Weekly BES Testing Workgroup Meeting – 10/2/2025, 10/9/2025, 10/16/2025, 10/23/2025, 10/30/2025
11. (External) BES Readiness/BI-29 Updates – 10/6/2025, 10/20/2025
12. eWorld/IV&V Mid-Month Check-in – 10/20/2025
13. (External) BES: OCM and Communications – 10/6/2025, 10/20/2025
14. (External) BES Data Conversion - DC Validation Issue Huddle – 10/1/2025, 10/10/2025
15. (External) BES Deferred Epics Discussion Meeting - cont'd – 10/6/2025, 10/20/2025, 10/27/2025
16. (External) 2nd BES Online Help Prototype(s) Review Meeting – 10/15/2025
17. (External) JAD Day 1 - CR2025-036 Alien SNAP Eligibility Changes – 10/3/2025
18. (External) JAD Day 2 - CR2025-036 Alien SNAP Eligibility Changes – 10/15/2025
19. (External) JAD CR2025-040 ABAWD and SNAP – 10/21/2025
20. (External) JAD CR2025-040 ABAWD and SNAP Work Requirements – 10/23/2025

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Appendices



Appendix A – IV&V Criticality Ratings

Criticality Rating	Definition
	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.
	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

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

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|--|------------------------------|
| • Project Management | • Security and Privacy |
| • Requirements Analysis & Management | • Testing |
| • System Design | • OCM and Knowledge Transfer |
| • Configuration and Development | • Pilot Test Deployment |
| • Integration and Interface Management | • Deployment |
| • Data Management and Conversion | |

Ending Slide



Solutions that Matter

		Reporter	Finding Type	Identified Date	Category	Description	Significance	Recommendation	Event Horizon	Impact	Probability	Analyst Priority	Finding Status	Status Update	Client Comments	Vendor Comments				
110	The US Federal Government Shutdown may delay the BES project	Molina, Brad	Finding - Risk	10/29/2025	Project Management	The BES Project relies on collaboration, funding, guidance, and approvals from Food and Nutrition Services (FNS). FNS staff are furloughed and unavailable to provide critical input, oversight, and decision-making support. Additionally, DHS priorities may change due to other critical and time-sensitive federal and State Policy changes that may require team members to be reassigned to other DHS mission-critical work.	The absence of FNS on the BES Project may lead to: <ul style="list-style-type: none">• Inability to confirm federal policy interpretations which may result in incorrect or incomplete requirements.• Possibility that the BES system may not meet FNS expectations, potentially jeopardizing FNS concurrence to enter Pilot and funding.• Rework once the government reopens, increasing costs and resource strain.	<ul style="list-style-type: none">• Document all assumptions made in the absence of FNS input to facilitate future validation.• Identify alternative paths or temporary solutions to maintain progress while minimizing rework.• Continue to communicate with State Executive leadership to communicate and gain support for decisions.• Establish and maintain a list of FNS questions/updates, allowing DHS to quickly bring FNS current on project status and expedite items requiring FNS input when the government reopens.	now		3	3 Med	Open							
109	Medium - Lack of a current BES Maintenance & Operations (M&O) Schedule May impact the ability of DHS and the ASI to manage the M&O work effectively	Molina, Brad	Finding - Risk	10/28/2025	Project Management	The project team is executing without a current Maintenance & Operations (M&O) schedule that aligns with the planned pilot and statewide go-live implementation timelines. The agreed M&O schedule does not reflect recent changes in milestones, resource assignments, or operational readiness activities necessary for a smooth transition to production. Additionally, DHS is unable to determine when resources are needed for DDI activities that may overlap with M&O tasks, which may lead to resource constraints. The ASI has stated multiple times that the schedule is being updated, per DHS' repeated requests over the last couple months. Additionally, ASI leadership of M&O has changed multiple times, which may also impact maintenance of the M&O schedule once reestablished.	Failure to execute to a current M&O schedule may result in: <ul style="list-style-type: none">- Inability for DHS and/or the ASI to effectively manage staff resources for both the DDI and M&O activities and tasks.- Inadequate planning and preparation of the operations team for pilot and go-live support.- Missed or delayed execution of critical readiness activities such as environment setup, training, UAT testing, and support planning.- Increased probability of service disruptions, user dissatisfaction, and stakeholder impact during implementation.	<ul style="list-style-type: none">- Update the M&O schedule to reflect current project timelines, resource commitments, and operational readiness activities based on estimates developed by the staff that will perform that work.- Establish a formal process for periodic review and validation of the M&O schedule with all relevant stakeholders.- Ensure the M&O schedule is integrated into the overall DDI project schedule and implementation readiness plans to show overlap of resource needs, tasks and activities.- Maintain alignment between development, operations, and DDI project management teams by creating cross-functional meetings that include team members from each silo to ensure consistent, timely communication thereby aiding in the change management processes.	now		3	3 Med	Open							
108	Unplanned federally mandated system requirements could lead to project delays and increase the project budget.	Fors, Michael	Concern	9/5/2025	Requirements Analysis & Management	As part of the OBDDA, there are several new SNAP requirements of which some are awaiting FNS implementation guidance. Examples include: new conditions for work requirements, prior ABAWD waivers, new exemption clauses, and standard utility deductions. The project is currently in the Systems Integration Test (SIT) phase, and the new requirements have yet to be fully defined, developed, and tested.	In 2024, DHS and the ASI agreed to transition from an "Agile" to a "Waterfall" software development life cycle to reduce the risk of future schedule delays. The Waterfall approach requires all requirements to move through the development as a single set of program code, processes, and procedures, ensuring that functionality is tested holistically. Once testing is complete, DHS can be confident that the base system is stable, performs as intended, and that functional interactions operate correctly. As the BES system is currently in the testing phase, introducing new requirements at this stage could create several challenges for the BES Pilot Release: <ul style="list-style-type: none">- Functionality previously tested may need to be retested as new code is introduced.- Training materials, content, and operational processes may also require updates to reflect the changes.- Schedule Delay - If new requirements are added, the project team may defer testing of existing functionality until the new functionality is developed and ready, potentially delaying the Pilot and Statewide Implementation start dates.- Resources - Additional effort may be required to define, develop, and test new requirements. This could necessitate more ASI and DHS staff support, as well as technical adjustments (e.g., keeping development environments active longer than originally planned).		now		3	2 Med	Open	10/30/2025 - The Food and Nutrition Services (FNS) organization is now unable to provide some interpretations on the required policy mandates due to the government shutdown, but DHS/ASI are continuing to move forward with those changes that are fully defined. 10/30/2025 - As of the end of the reporting period, DHS was still awaiting clarifications from the Food and Nutrition Service (FNS) on required changes needed to meet Federal Eligibility mandates.						
106	Critical and high vulnerability and configuration scan findings are not remediated within the documented timeframes.	Heath, Dustin	Finding - Risk	2/28/2025	Security and Privacy	The BES system does not currently remediate critical vulnerabilities and compliance issues within 15 days, and high vulnerabilities are not remediated within 30 days as required by the BES Vulnerability Management Procedures document.	The BES system faces elevated cybersecurity, operational, financial, and compliance risks if vulnerabilities are not remediated within the required timeframe. Prompt corrective actions are necessary to ensure timely vulnerability resolution and safeguard the BES system environment prior to going live. Un-remediated critical and high Nessus compliance scans can significantly hinder system development efforts by introducing security risks, compliance failures, and operational roadblocks. This lack of remediation of system configuration findings increases technical debt, disrupts development workflows, and diverts resources from core project objectives.	IN PROGRESS - Implement an escalation process to involve senior leadership if deadlines are missed. COMPLETE Update the BES Vulnerability Management Procedures document with the Jira ticketing process and workflow from vulnerability and configuration scan remediation with who owns each step. Rate Configuration scan result failures and how they impact the security of the BES system (Critical, High, Medium, and Low) instead of simple pass/failure results. In January 2025, 82 critical and high-finding POMAs were listed due to the Temble configuration scan results. The POMAs for configuration scans are now listed as "Failed" due to the binary nature of the scan engine and does not rate the criticality of the system configuration on the business operation of how the hosts are used.	30 days prior to the IRS assessment or the next third-party assessment.		3	3 Med	Open	11/5/2025 - As of October 31st, 2025, BES had 11 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 1 critical finding was within the timeframe. BES had 27 high-rated findings in an open state outside the 30-day remediation timeframe, and 29 high-rated findings were within the timeframe. In addition to the critical and high POMAs listed above, 14 critical findings and 33 high findings from 2024 are listed as deferred, which are part of the Oracle Cloud Infrastructure that Oracle is responsible for patching on a quarterly basis. 10/2/2025 - As of October 1st, 2025, BES had 10 critical findings in an open state outside the 15-day remediation timeframe, and 1 critical finding were within the timeframe. BES had 28 high-rated findings in an open state outside the 30-day remediation timeframe, and 18 high-rated findings were within the timeframe. In addition to the critical and high POMAs listed above, 14 critical findings and 33 high findings from 2024 are listed as deferred, which are part of the Oracle Cloud Infrastructure that Oracle is responsible for patching on a quarterly basis. 8/28/2025 - As of August 27, 2025, BES had 28 critical findings in an open state outside the 15-day remediation timeframe, and 3 critical findings were within the timeframe. BES had 52 high-rated findings in an open state outside the 30-day remediation timeframe, and 42 high-rated findings were within the timeframe. 10 critical findings and 30 high findings are part of the Oracle Cloud Infrastructure, which Oracle is supposed to patch quarterly. 7/31/2025 - As of July 31st, 2025, BES had 18 critical findings in an open state outside the 15-day remediation timeframe, and 3 critical findings were within the timeframe. BES had 15 high-rated findings in an open state outside the 30-day remediation timeframe, and 24 high-rated findings were within the timeframe. N&V notes that this month's number of vulnerabilities outside of the remediation timeframes for the critical and 10-31-25. DHS and the ASI conducted five additional collaborative working sessions to continue reviewing contract requirements that remain untraced or unfulfilled. The objective is to ensure all project requirements are accurately mapped, supporting complete and reliable traceability within the JIRA tool used to generate the Requirements Traceability Matrix (RTM) deliverable. The ASI reported as of July 17, 2025, out of the 2,971 requirements for the project, a total of 741 unmappped requirements were identified that were not mapped properly. Of these unmapped requirements, 349 have been reconciled, with 392 that remain outstanding, primarily within the categories of Implementation, and Maintenance & Operations (M&O) requirements. The ASI planned to deliver an interim RTM on 11/3/25. The ASI reported that due to the System Integrity Review Tool (SIRT) project revision taking priority, it has caused delays, and the interim RTM will be delayed by up to two weeks. Any potential delays will minimize the time the project team has to review the RTM to verify that all necessary BES functionality and supporting components have been developed and will be validated during current and future testing phases. 9-30-25 - DHS and the ASI conducted three collaborative working sessions to continue reviewing contract requirements that remain untraced or unfulfilled. The objective is to ensure all project requirements are accurately mapped, supporting complete and reliable traceability within the JIRA tool used to generate the Requirements Traceability Matrix (RTM) deliverable. As of July 17, 2025, a total of 741 requirements have been identified. Of these, 228 have been reconciled, while 513 remain outstanding, primarily within the categories of Technical, Implementation, and Maintenance & Operations (M&O) requirements. The ASI has made progress by submitting documentation that was subsequently approved by DHS, formalizing agreements for a portion of the remaining contract requirements. Additional 10/21/2025 - The ASI is executing physical and technical test scripts, with most tests passing. The ASI is planning to complete all interface testing by the end of the overall SIT testing cycle. 9/30/2025 - The ASI reported that the interface test cases are established in Jira, but the board has not yet been made available to N&V. The first interface test (CS&A/EKEI) was executed, marking an initial step forward. Timely N&V access is needed to evaluate test coverage, effectiveness, and results. 8/21/2025 - JIRA tickets are actively being created to define the specific tests required for each interface. As in the previous testing cycle, these tickets will outline test objectives and predefined scenarios, rather than detailed, step-by-step scripts. Delays in initiating test execution are reducing the available time within the SIT window to complete testing, analyze defects, resolve issues, and conduct retesting. The late start further constrains efforts to address defects before UAT, increasing the risk that unresolved issues may impact downstream phases of the project. 7/28/2025 - The test script development has been assigned to a team. However, ASI attention to SIT defects has prevented significant progress. Testing is still intended to occur during System Integration Testing (SIT), which is currently underway. IV reiterates that finalizing and executing interface test scripts during SIT compresses the testing timeline and may limit the opportunity to address defects before UAT. 6/26/2025 - The ASI SIT test team has begun test planning and test script development. Testing is intended to occur during System Integration Testing (SIT), which is already underway. While this represents progress, IV notes that finalizing and executing interface test scripts during SIT compresses the testing timeline and may limit the opportunity to address defects before UAT. 5/31/2025 - No progress was made during this reporting period. Of the twenty-one interfaces, 7 are reconciled as complete with 14 outstanding. The ASI plans to create the test	9/12/2025 The number of critical-high issues being reported seem elevated compared to our numbers. It appears the numbers being reported include "deferred" along with "open". We distinguish between "open" and "deferred" because the "deferred" items are OI vulnerabilities and thus not under our control to meet the target dates. This point is clarified at the end of the paragraph - however we have some concerns about reporting these items as "potentially impacting the project schedule and causing delays". We have an	9/9/2024 include information on interim version provided prior to FAT.	7/12/2024 I'm not sure if this is worth noting but w/forbes did deliver an "interim" Bi-21 RTM to satisfy the requirement criteria for entering into BES 1.0 FAT.	06/14/2024 The Bi-21 RTM deliverable has been reviewed and discussed multiple times at the bi-weekly CCM meeting. Drafts of the Bi-21.	06/14/2024 As mentioned at the May pre-meet, a technical interface team plan does exist to address PCO's recommendations for this finding 5/12/2024	As mentioned at the pre-meet, a technical interface team plan does exist to address PCO's recommendations for this finding.
94	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.	Morrill, Scott	Finding - Risk	4/25/2024	Requirements Analysis & Management	The Requirements Traceability Matrix (RTM) (Bi-21) plays a vital role in ensuring the system's compliance with contractual commitments by associating each requirement with passed test cases). However, the approved project schedule shows the RTM completed on 6/26/24, which falls after the Core SIT end decision on 5/10/24. The ASI provided the Bi-22a System Integrity Review Tool (SIRT) to DHS on April 26, 2024, but without the deliverable due to DHS concerns. This Bi-22a deliverable may help DHS validate requirements.	It is unclear to DHS and IVV how the ASI will trace requirement coverage for SIT completion. DHS may be unable to make an informed decision on SAT and SIRT criteria. This could lead to DHS starting Final Acceptance Testing (FAT) and then realizing that not all requirements have been fully met, resulting in delays.	IN 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". Ensure test scripts thoroughly and comprehensively test the system to assure each requirement has been fully met. • Develop a deliverable that provides an audit trail for changes to the requirements from the contract such as obsolete requirements, when that decision was made, and the change requests. • Provide weekly updates about the clean-up efforts in JIRA regarding incorrect statuses of epics, use case, and requirements. • Create a detailed plan outlining the timeline for completing the clean-up efforts for the requirements and describe the metrics that will be used to evaluate the final outcome.	5/10/2024		3	3 Med	Open							
93	Due to the lack of physical and technical 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	Reynolds, Mark Evan	Finding - Risk	4/29/2024	Integration and Interface Management	Aside from the functional testing accomplished during epic testing, specific data flow testing is usually part of an interface definition.	This testing is essential before initial deployment to prevent unexpected and difficult-to-resolve issues, such as scrambled or missing data -- or the system may have a fault or exception. Since the Project has not established and tested the fault scenarios, we do not know how the system may react.	In Process - API interfaces should be tested for failure conditions during connection and transfer operations. • FFP and file interfaces should be tested for data and file integrity. • Test data fields for system impacts resulting from data that is poorly formatted, out of range, or other unexpected data transmission errors. • Remove "Not applicable--No transactional interfaces, therefore no race condition)" API interfaces do not require race condition testing. (Reconduct with other recommendations) Testing for format, length, and other physical formatting errors in interface records and files is covered under existing test plans.	2024 2nd Qtr		3	2 Low	Open							

ID	Title	Reporter	Finding Type	Identified Date	Category	Description	Significance	Recommendation	Event Horizon	Impact	Probability	Analyst	Finding Status	Status Update	Client Comments	Vendor Comments
69	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.	Fors, Justin	Finding - Issue	6/2/2023	Testing	After examining the Project's R11 QA Dashboards, R11 Traceability Dashboards, and Test Repository, gaps in testing coverage may exist and the progress of testing might be lagging. Concerning testing coverage, it appears that not all epic and use cases in R11 have associated test cases or are testing the correct use cases. In terms of progress, some test cases remain unexecuted, and not all defects have been resolved as the project commences System Integration Testing (SIT). The ASi has plans to complete the INT exit criteria by June 16, 2023, about 2 weeks after SIT begins.	Identifying defects early is vital for effective testing, as it is more efficient and cost-effective to address issues during the early testing stages. If there is slow progress or incomplete testing in the early stages, it can result in more defects leaking into subsequent testing phases, necessitating more extensive and rigorous testing efforts. Insufficient testing coverage or slower-than-anticipated progress throughout the project lifecycle increases the risk of encountering significant delays, extensions, or the introduction of defects into the production environment during the final testing stage, known as Final Acceptance Testing (FAT).	OPEN - 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 by User Acceptance Testing (UAT). - ASi test team provide a visual of progress of test case execution compared to current testing schedule. CLOSED - ASi assesses the potential impact of the large number of unexecuted defects on future development efforts, ensuring a more robust and efficient development process. - ASi develop and implement a revised testing approach to improve the completeness and thoroughness of future testing cycles. - The ASi should determine the root cause of the failure to identify simple defects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT (Closed 10/30/2024). - ASi should ensure testing is thoroughly planned for both breadth and depth of testing to ensure the system is adequately tested (Closed 10/30/2024). - ASi utilize the two-week FAT testing pause to address and resolve outstanding SIT tests on schedule. Key integration areas with pending execution include HANA Integration, Eligibility, and Mass Change. IVV notes a decline in test execution velocity compared to the prior month, which may compress the schedule to meet the October completion target. Additionally, the Reports area shows a notable volume of blocked tests and unexecuted defects, with approximately 50% of these defects created during the month. - R13/125 - SIT testing continues to progress. While execution of E2E tests is underway, a substantial portion remains outstanding while blocking defects are being addressed. Timely execution of these tests will enable prompt detection of critical integration issues, validate system stability, and reinforce stakeholder confidence. Recent trends indicate that while the weekly rate of defect discovery remains higher than the rate of resolution, steady progress is observed, with approximately 60% of all high-severity and high-priority defects being resolved by month end. To date in	UAT	4	4	Med	Open	10/15/2025 - Approximately 30% of the outstanding SIT tests are blocked in key areas of Eligibility and SSP, which also represent the highest areas of remaining unexecuted tests. Additionally, only a third of end-to-end (E2E) tests have passed, raising concerns about system readiness. Integrations between the BES Module, Case Management, Application Management, Financial Management, and stability. Defects continue to be concentrated in problematic areas of Reports and SSP, which also represent the top areas of repeated defects this month. - 9/30/25 - The ASi plans to complete all SIT (scripted tests) by the end of October. However, approximately 80% of end-to-end (E2E) tests remain unexecuted. The timely execution of these remaining tests is essential for detecting integration issues, validating system stability, and reinforcing stakeholder confidence. Mid-month, the ASi added additional SIT tests related to the HANA integration, bringing the total of unexecuted SIT tests (including E2E) to 240. The ASi has improved confidence in completing all tests on schedule. Key integration areas with pending execution include HANA Integration, Eligibility, and Mass Change. IVV notes a decline in test execution velocity compared to the prior month, which may compress the schedule to meet the October completion target. Additionally, the Reports area shows a notable volume of blocked tests and unexecuted defects, with approximately 50% of these defects created during the month. - R13/125 - SIT testing continues to progress. While execution of E2E tests is underway, a substantial portion remains outstanding while blocking defects are being addressed. Timely execution of these tests will enable prompt detection of critical integration issues, validate system stability, and reinforce stakeholder confidence. Recent trends indicate that while the weekly rate of defect discovery remains higher than the rate of resolution, steady progress is observed, with approximately 60% of all high-severity and high-priority defects being resolved by month end. To date in		
80	Development delays have negatively impacted the project schedule and delayed go-live.	Fors, Michael	Finding - Issue	6/30/2022	Configuration and Development	ASi had previously reported development activities have been slowed as they have been unable to achieve and/or maintain their expected development velocity. Previously, the development team was challenged with accurately estimating development task level of effort (i.e., story points) and the project has been challenged with producing a project schedule that accurately reflects realistic timelines (see Finding #74). The ASi continues to be challenged with finding qualified resources in a timely manner.	If the ASi is unable to achieve a velocity that enables them to meet planned milestones, schedule delays may lead to a delayed system go-live date. Failure to achieve a level of accuracy in estimating development tasks could lead to a project schedule that is flawed and unrealistic. Previously, DHS had indicated, and IVV agreed, that some of these delays were due to some ASi BA's lacking the expertise required to create optimal designs and system specifications that developers could consume without requiring extensive clarification from the ASi BA's team. DHS and IVV observed instances where ASi BA's/BA's have presented less than optimal designs and left it to DHS (who may lack software or UI design expertise) to improve, which has contributed to unproductive design sessions (see Finding #61). It remains unclear if scope creep has contributed to these delays.	OPEN - ASi provides DHS with the time needed to effectively evaluate the software demonstrations (demo) and elicit productive design discussions with DHS attendees during each demo. - The project closely monitor progress on development efforts that are complex and/or require a substantial level of effort and create a mitigation strategy to avoid delays. COMPLETE - CLOSED - ASi regularly report metrics that accurately track the total amount of remaining work to reach go-live and present a dynamic burn-down chart to clearly display progress to stakeholders. Closed 3/31/2025) - ASi effectively track and regularly provide DHS (potentially via the weekly DOT stand meeting) with an accurate velocity (e.g., story points completed) to the development lifecycle and hinder overall productivity. 8/31/2025) - The ASi is reporting System Integration Testing (SIT) is progressing as planned. IVV continues to monitor for potential development delays and/or code quality issues that may impact the effectiveness and timely completion of the SIT phase. The project team indicated they plan to introduce new functionality during UAT which may slow defect repair, reward and add additional complexity for developers to manage resulting in the least impact to the project and project team. 7/30/2025 - The ASi appears to be making good progress with System Integration Testing (SIT). It remains unclear whether development delays will impact the successful completion of SIT. 6/30/2025 - It remains unclear to IVV whether there has been meaningful improvement in ASi's code quality. While the ASi stated that unexecuted defect counts were low enough to meet the criteria (below 20% of all reported defects) for entering SIT, IVV raised questions regarding the inclusion of defects that existed prior to INT that were not answered by the end of June. The level of defects could elevate development and system stability risks, which could lead to slowed development and unexpected project delays. 5/31/2025 - DHS stated that the ASi had not accounted for 10/31/2025 - Some defects reported during SIT have not caused in the stability of the BES infrastructure. The ASi states that the issues with shared resources and disruptive software updates are not the root cause of the issues should not be present in production. However, IVV has not yet been provided with artifacts or project documentation to validate that these issues will not materialize in UAT or Production environments. 3/30/2025 - Work appears to be progressing on the full build out of the Secure Enclave. N&V remains concerned that this build out adds additional complexity to the infrastructure environment which could further exacerbate this risk. 8/31/2025 - The ASi indicated that communication between the DHS shared platform team and the BES project has improved, reducing the likelihood of unforeseen or unexpected issues arising from the shared platform moving forward. The project elected to add a new AI tool to its suite of tools to assist users with online help and user guides. During recent Maintenance and Operations (M&O) planning sessions, the project team identified areas such as Security and Incident Management where BES infrastructure operational processes may differ from those used in the legacy systems. How this added complexity will impact implementation schedules and the scope of M&O planning and support, is not yet known. 7/30/2025 - The project appears to be making efforts to improve communications between the shared platform team and the BES project. IVV remains concerned that changes to the DHS shared services platform could negatively impact the project schedule and budget. 6/30/2025 - IVV remains concerned that changes to the DHS shared services platform could negatively impact the BES project schedule. Governance over the platform has yet to be formalized. The project team has stated concerns about the recent lack of effective communication around the recent changes shared services. 5/31/2025 - The BES system currently relies on services provided by a 10/30/2025 Additional information was requested from the ASi regarding progress in defining and implementing configuration management for BES, but as of the end of the reporting period no additional status information was provided. 9/30/2025 - No material update. 9/30/2025 - No material update. 7/30/2025 - No material update. 6/30/2025 - The ASi continues to make progress in building out its Configuration Management, including leveraging ServiceNow to automate some processes to streamline deployments. However, it remains unclear if the configuration management database will be robust enough to offer developers clear root cause traceability to correlate bugs to system or infrastructure configuration changes. This could hinder defect tracing and delay repair efforts and lead to project delays. 5/31/2025 - No material update. 4/30/2025 - IVV continues to await receipt of the Configuration Management Plan from the ASi. 3/31/2025 - The ASi has reported progress in updating the project Configuration Management Plan (CMP). 2/28/2025 - The ASi has reported progress in constructing their configuration management database within ServiceNow, having recently imported multiple configuration items (CIs). 1/31/2025 - No material update. 12/31/2024 - No material update. 11/30/2024 - This finding will be reevaluated by the IVV team after the project team completes the re-planning and determines the approach, requirements/functionality, and schedule for the Pilot and Statewide rollout. 10/31/24 - This finding will be reevaluated by the IVV team after the project team completes the replanning and determines the approach, requirements/functionality, and schedule for the Pilot and Statewide rollout. 9/30/24 - The ASi had recently stated they plan to update their Configuration Management Plan (CMP) list of configuration items (CI) and CMP procedures by 9/30/24 but has since experienced some delays in completing these activities. 8/31/24 - IVV has yet to receive a detailed,	Immediate	3	3	Med	Open	10/30/2025 - It remains unclear if any development issues may delay the project, however, additional work for change request (CR) 2023-028 (ASi/ASD and SNAP Work Requirements updates will not be completed until 1/26/2026, which is after the planned start for User Acceptance Testing (UAT)). To avoid placing any risk to functionality after UAT has started, the ASi and DHS have agreed to delay the start of UAT - which will push out go-live for Pilot and statewide implementation. 9/30/2025 - The ASi has indicated its intent to leverage AI-based tools to support unit testing, which may increase developer productivity. However, N&V remains concerned that the planned introduction of additional functionality during UAT could add complexity to the development lifecycle and hinder overall productivity. 8/31/2025 - The ASi is reporting System Integration Testing (SIT) is progressing as planned. IVV continues to monitor for potential development delays and/or code quality issues that may impact the effectiveness and timely completion of the SIT phase. 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73	The planned BES infrastructure is complex which could be difficult to implement and lead to schedule/cost impacts.	Fraica, Joe	Finding - Risk	10/28/2021	System Design	Current ASi infrastructure plans include a significant number of sophisticated components that make up a complex cloud infrastructure. Further, the Project Team has yet to finalize components that will make up the BES infrastructure and the additional costs and time to configure, test, and implement the planned complex environment remain unclear.	If the level of effort to implement and manage the complexities of the BES infrastructure is not accurately accounted for and staffed by the ASi, the project could be met with unexpected costs and schedule delays. Delays in finalizing the components being implemented could exacerbate this risks and lead to further delays. Complex platforms often present system maintenance and operations challenges as system changes can hold the increased potential for system failure (i.e., due to the significant number of "moving parts") and increase the level of time and effort to resolve infrastructure and application-level bugs. Further, some components remain in an immature state compared to their legacy counterparts. For example, the project recently experienced a system failure because Google Cloud failed to clearly communicate a change that led to failure in another component (i.e., Nexus). Google Cloud is generally viewed as a less mature product offering, compared to their rivals (Amazon Web Services, Microsoft Azure). N&V remains concerned that this could lead to failures at critical points in the project (including post-go live production failures) that could be difficult to resolve and lead to project disruption. If DHS intends to eventually reduce M&O outsourcing costs turning over M&O tasks to State employees, they could face challenges supporting tools they may not be familiar with in a complex infrastructure environment.	• ASi develop a process to closely monitor cloud and other product changes (software updates/new releases), manage changes, and regression test changes/updates are applied. - The project team work to establish strong governance over the utilization and maintenance of the system's various tools/components. - ASi allocate time in the schedule to conduct proof of concepts to assure infrastructure components work as expected. - ASi maintain a detailed schedule for DevOps implementation tasks to avoid unexpected delays that could delay project milestones and the critical path.	Next several months	2	2	Low	Open	10/31/2025 - Some defects reported during SIT have not caused in the stability of the BES infrastructure. The ASi states that the issues with shared resources and disruptive software updates are not the root cause of the issues should not be present in production. However, IVV has not yet been provided with artifacts or project documentation to validate that these issues will not materialize in UAT or Production environments. 3/30/2025 - Work appears to be progressing on the full build out of the Secure Enclave. N&V remains concerned that this build out adds additional complexity to the infrastructure environment which could further exacerbate this risk. 8/31/2025 - The ASi indicated that communication between the DHS shared platform team and the BES project has improved, reducing the likelihood of unforeseen or unexpected issues arising from the shared platform moving forward. The project elected to add a new AI tool to its suite of tools to assist users with online help and user guides. 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70	Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution	Fors, Michael	Finding - Risk	8/23/2021	Configuration and Development	The B-6 DOI Plan Deliverable, Section 5.2 establishes the framework for the Configuration Management Plan. However, it remains unclear if sufficient progress has been made toward establishing CM processes and governance, selecting CM tools (e.g., CMDB), and building out the CM infrastructure. The project's Security Plan has yet to be finalized which may include additional requirements or decisions that could impact CM. The project currently relies on GitHub for tracking of some configurations.	Configuration Management is a set of processes and procedures that ensures the BES is understood and works correctly. The BES solution includes tools that may provide a level of automation for Configuration Management that may reduce errors and should provide the project team with accurate, dynamic and timely information on some of the configuration items. However, it is critical that DHS/ASi agree to the full list of items that are included in the configuration plan along with the details regarding the management of the configuration items, reporting and audit features.	OPEN - ASi adhere to plans for configuration management as documented in B-6 DOI Plan, Section 5.2 and clearly details and/or any changes with DHS. - ASi validate plans for configuration management with DHS and agree on a meaningful list of configuration items or settings they will track. COMPLETE - DHS and ASi work to clearly identify plans for the potential use of configuration management tools. - Identify the DHS POC for the Configuration Management Activities that would provide oversight of configuration management activities and assure defined CM steps and plans are being followed, are effective, and are achieving DHS objectives for CM. 7/31/2022	ASAP	2	2	Low	Open	10/30/2025 Additional information was requested from the ASi regarding progress in defining and implementing configuration management for BES, but as of the end of the reporting period no additional status information was provided. 9/30/2025 - No material update. 9/30/2025 - No material update. 7/30/2025 - No material update. 6/30/2025 - The ASi continues to make progress in building out its Configuration Management, including leveraging ServiceNow to automate some processes to streamline deployments. However, it remains unclear if the configuration management database will be robust enough to offer developers clear root cause traceability to correlate bugs to system or infrastructure configuration changes. This could hinder defect tracing and delay repair efforts and lead to project delays. 5/31/2025 - No material update. 4/30/2025 - IVV continues to await receipt of the Configuration Management Plan from the ASi. 3/31/2025 - The ASi has reported progress in updating the project Configuration Management Plan (CMP). 2/28/2025 - The ASi has reported progress in constructing their configuration management database within ServiceNow, having recently imported multiple configuration items (CIs). 1/31/2025 - No material update. 12/31/2024 - No material update. 11/30/2024 - This finding will be reevaluated by the IVV team after the project team completes the re-planning and determines the approach, requirements/functionality, and schedule for the Pilot and Statewide rollout. 10/31/24 - This finding will be reevaluated by the IVV team after the project team completes the replanning and determines the approach, requirements/functionality, and schedule for the Pilot and Statewide rollout. 9/30/24 - The ASi had recently stated they plan to update their Configuration Management Plan (CMP) list of configuration items (CI) and CMP procedures by 9/30/24 but has since experienced some delays in completing these activities. 8/31/24 - IVV has yet to receive a detailed,		
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