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DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | *KA ʻOIHANA LOIHELU A LAWELAWE LAULĀ*

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES | *KEʻENA HOʻOLANA ʻENEHANA*

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

March 5, 2026

The Honorable Ronald D. Kouchi
President of the Senate
and Members of the Senate
Thirty-Third State Legislature
State Capitol, Room 409
Honolulu, Hawaiʻi 96813

The Honorable Nadine K. Nakamura
Speaker and Members of the
House of Representatives
Thirty-Third State Legislature
State Capitol, Room 431
Honolulu, Hawaiʻi 96813

Aloha Senate President Kouchi, Speaker Nakamura, and Members of the Legislature:

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

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

Sincerely,

Christine M. Sakuda
Chief Information Officer
State of Hawaiʻi

Attachments (2)

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

KEIKI Replatform Off Mainframe (KROM) Project

MONTHLY IV&V REVIEW REPORT

January 30, 2026 | Version 0.1

ACCUITY

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Document History

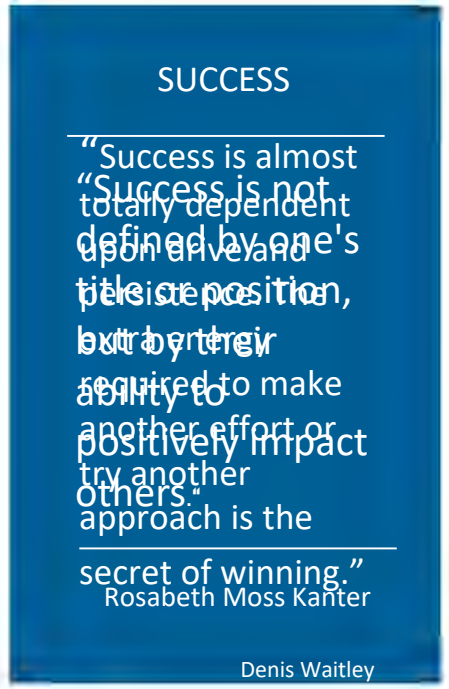
DATE	DESCRIPTION	AUTHOR	VERSION
2/03/26	Monthly IV&V Review Report Draft created	Dawn Rose	0.0
2/27/26	Monthly IV&V Review Report Final created	Dawn Rose	0.1

BACKGROUND

The CSEA of Hawaii (CSEA), Department of Attorney General (AG), Child Support Enforcement Agency (CSEA) contracted Protech Solutions, Inc. (Protech) on October 2, 2023, to replatform the KEIKI System and provide ongoing operations support. Protech has subcontracted One Advanced and DataHouse to perform specific project tasks related to code migration, replatforming services, and testing. The agreement with DataHouse was terminated in February 2025. The Department of AG contracted Accuity LLP (Accuity) to provide Independent Verification and Validation (IV&V) services for the project. In November 2025, Accuity joined the Crete Professional Alliance (Crete). "Accuity" now operates under two entities Accuity LLP – a licensed CPA firm providing attest services and Accuity Advisors – offering tax and business consulting (not a CPA firm). Both work together under the Accuity brand in an alternative practice structure, following AICPA standards and applicable laws.

Our initial assessment of project health was provided in the first Monthly IV&V Review Report as of October 31, 2023. Monthly IV&V review reports will be issued through February 2026 and build upon the initial report to continually update and evaluate project progress and performance.

Our IV&V Assessment Areas include People, Process, and Technology. The IV&V Dashboard and IV&V Summary provide a quick visual and narrative snapshot of both the project status and project assessment as of January 30, 2025. Ratings are provided monthly for each IV&V Assessment Area (refer to Appendix A: IV&V Criticality and Severity Ratings). The overall rating is assigned based on the criticality ratings of the IV&V Assessment Categories and the severity ratings of the underlying observations.



PROJECT ASSESSMENT

JANUARY 2026

SUMMARY RATINGS

OVERALL RATING

Y

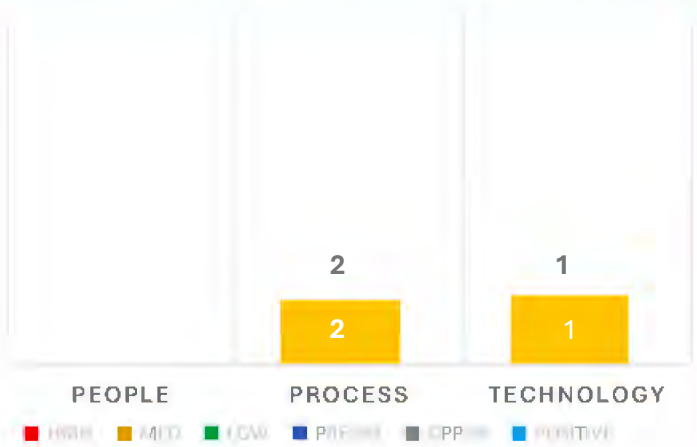
Deficiencies were observed that merit attention. Remediation or risk mitigation should be performed in a timely manner.

PEOPLE	Y
PROCESS	Y
TECHNOLOGY	Y

CRITICALITY RATINGS

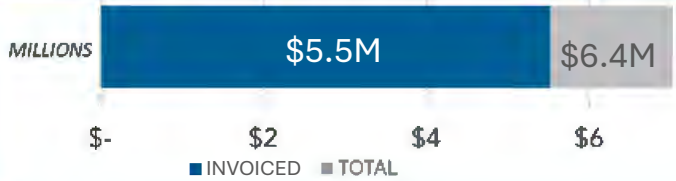
R	Y	G	NA
HIGH	MEDIUM	LOW	N/A

IV&V OBSERVATIONS



0	3	1	5
NEW OBSERVATIONS THIS MONTH	OPEN OBSERVATIONS TOTAL	CLOSED OBSERVATIONS THIS MONTH	OPEN RECOMMENDATIONS TOTAL

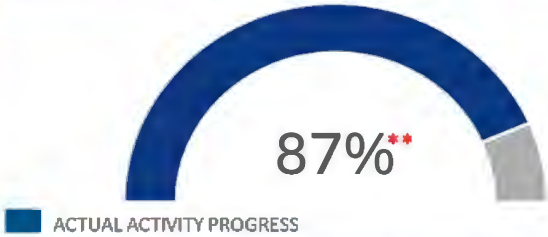
PROJECT BUDGET *



* Only includes contracts. IV&V is unable to validate total budget.

PROJECT PROGRESS

(Percent of the weighted duration of total tasks)



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

KEY PROGRESS & RISKS

Key Progress:

- The project overall is at 87% completion, and the system installation phase is at 98%. The Overall Acceptance Testing phase is at 83%.
- Testing progress and visibility improved this month. As of January 29, 2026, UAT execution was reported at 76% passed (1,231 scripts), with 3% failed (62), 3% blocked (57), and 9% remaining (160). SIT MOU Part 2 was submitted to CSEA for review and approved on January 28, 2026.
- The Daily Task Process and Performance Defect Resolution items were supported by evidence of promotion to UAT and batch execution within the required 8-hour window, while interface and untested-batch MOU items remained open pending IBM fixes and CSEA validation.

Key Risks:

- The project remains on a delayed trajectory with overall completion at 87% and Acceptance Test Execution at 67%, while go-live has shifted beyond the baseline to May 17, 2026. A CR was requested by CSEA of ProTech, with ProTech agreeing to no additional project cost due to the extension. Delivery of the CR is expected in early February. SIT was not formally completed, with SIT MOU Part 2 pending CSEA acceptance and the System Test Results Report (Deliverable #21) outstanding.
- Batch performance meets the 8-hour window, but 15 documented latencies and infrastructure dependencies require continued monitoring through UAT and before go-live. There remain unresolved dependencies tied to interface and batch execution issues that IBM is responsible for correcting.
- Deliverables #9, 12, 16, and 21 are past due and are outstanding.

PROJECT SCHEDULE – Current Progress

(See next page for the current agreement and schedule history)

KROM PROJECT SCHEDULE HISTORY

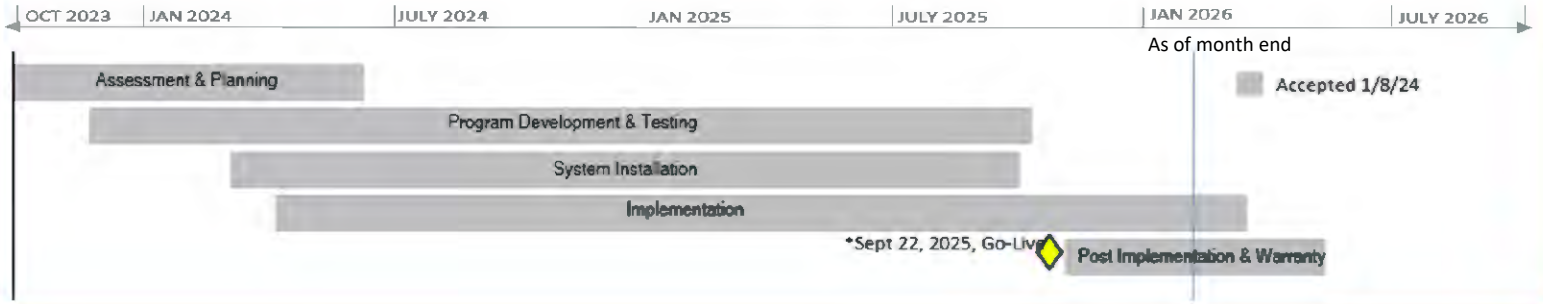
A historical perspective of the three project timelines for the KROM project post kick-off.

1. Project schedule as of DDI Project Management Plan, Deliverable 2 approval on January 8, 2024.

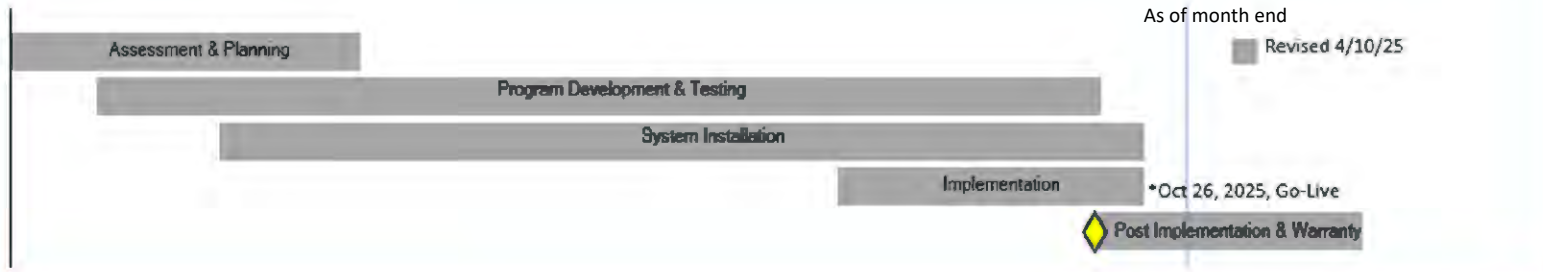
2. Project schedule based on the April 10, 2025, no-cost change request.

3. Project schedule based upon the August 29, 2025, change request PCR-8.

PROJECT SCHEDULE – Approved January 8, 2024, Deliverable 2



PROJECT SCHEDULE – Revised April 10, 2025, Signed Agreement



PROJECT SCHEDULE - Revised August 29, 2025, Change Request PCR-8

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
R	Y		Overall	

Project Schedule:

As of the latest schedule report dated January 29, 2026, the January schedule status shows the KEIKI Replatforming Project at 87% completion, with the System Installation Phase at 98% completion, reflecting a current Go-Live date of May 17, 2026. Acceptance Testing remains in progress, with the schedule showing Acceptance Testing at 83% completion and Acceptance Testing (execution) at 67%.

UAT is now expected to continue through April 15, 2026. CSEA also reported UAT progress at 76% passed (1,231 scripts) with 57 scripts blocked as of the January stakeholder update. Schedule drivers and remaining constraints continued to include open interface readiness (mainframe ↔ KROM file transfers are not fully ready), and the System Test Results Report (Deliverable #21) is a dependency.

SIT MOU Part 2 achieved CSEA validation for Daily Task Process and Performance Defect Resolution (submitted to CSEA on 1/15/2026 as a formal acceptance package and approved on 1/28/26).

The table below summarizes the deliverables with the updated status. Due dates are based on the rebaselined schedule (PCR 7). According to the January 28th Project Schedule, the updates are as follows.

Deliverable	Complete %	Due Date	Comments and Status
Del #9- Disaster Recovery Plan	91%	October 2025	Plan was submitted. The walk-through meeting was completed. Disaster recovery testing is in progress. CSEA awaiting resubmittal updates.
Del #12- Knowledge Transfer Plan	15%	December 2025	Open item for ProTech to complete initial draft
Del #14- Implementation Plan	**100%**	October 2025	**The 1/28/2026 schedule status reflects approval**.
Del #15- User Guide	**100%**	October 2025	**The status as of the 1/28/2026 schedule reflects approval.**
Del #16-System Administration Manual	67%	December 2025	Open item for ProTech to complete initial draft.
Del #21-System Test Results Report	0%	December 2025	Not started

Project Costs:

As of late January, the project costs remain within the contracted agreement. Protech will submit three change requests to align the scheduled finish dates and has confirmed that these requests will be at no-cost.

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
			Overall cont.	**Quality:** SIT quality governance continued to mature in January, with the formal acceptance process actively applied. SIT MOU Part 2 was submitted to CSEA on January 15, 2026, covering the Daily Task Process and Performance Defect Resolution items, and achieved CSEA validation at the end of the month. Evidence provided supported promotion to UAT and confirmed batch execution within the required 8-hour operational window. While these items advanced, MOU items related to interfaces and untested batch jobs remained open, pending IBM fixes and completion of validation activities. UAT execution progressed following restart, with 76% of test scripts passed and 70 active UAT defects remaining at the end of January. Performance testing demonstrated that all tested batch scenarios met established thresholds; however, 15 documented performance latencies require continued monitoring through UAT and prior to go-live. **Project Success:** Several measurable successes were achieved during January despite ongoing schedule and testing constraints. UAT execution was successfully restarted, enabling meaningful progress, with 76% of executed test scripts passing and 22 previously corrected defects retested, of which 18 were formally closed. This restart restored testing momentum following earlier blocking issues and allowed the CSEA to re-engage in validation activities. Significant progress was realized in performance validation, where batch execution was demonstrated to operate within the required 8-hour window, including high-volume scenarios. This evidence supported advancement of the Performance Defect Resolution item within SIT MOU Part 2 and reduced performance-related uncertainty entering late-stage UAT. Additional success was achieved in governance and readiness alignment, as the SIT MOU Part 2 acceptance package was formally submitted to CSEA, and several critical deliverables (Implementation Plan, Disaster Recovery Plan, and User Guide) advanced through late-stage review. Collectively, these accomplishments reflect continued forward progress in stabilizing the system and positioning the project for completion of remaining testing and acceptance activities. **Risk Conclusion:** In January, UAT execution and open-defect counts improved, and performance readiness evidence strengthened. Due to the extension of UAT through April 15, 2026 and unfinished end to end interface validation, the schedule changed, with a May 17, 2026, go-live communicated in late January, resulting in the project risk rating remaining **Yellow.**

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y R	Y	Y	People Team, Stakeholders, & Culture	Strong teamwork and communication continued throughout January, with CSEA, ProTech, and external partners working collaboratively to advance testing and address technical and schedule constraints. Teams actively engaged in UAT execution and defect triage, coordinated SIT close-out activities (including submission of SIT MOU Part 2 for CSEA review), and collaborated on batch performance validation, confirming execution within the 8-hour window requirement. Additional engagement included hands-on participation in mainframe interface testing, coordination with IBM to resolve remaining constraints, and continued involvement in deliverable reviews and governance forums to support operational readiness and maintain transparency. **Team:** Project progress in January was driven by active collaboration across CSEA, ProTech, and vendor teams, including the restart of UAT, coordinated defect triage resulting in 22 defects retested and 18 closed, and preparation and submission of SIT MOU Part 2, supported by validated batch performance within the required 8-hour window. Teams executed batch and interface testing, ran mainframe JCLs, and Protech coordinated closely with IBM to address dependencies. However, testing throughput was constrained by the need to sequence work around unresolved interface issues, limited availability of IBM-assigned fixes, and the effort required to retest and validate corrected items, which extended execution timelines despite sustained engagement and governance alignment. **Stakeholders:** Two external dependencies continued to affect testing and schedule execution through January, primarily tied to IBM-owned performance and interface-related fixes. Performance validation activities progressed and were documented through January performance review sessions, including evidence that tested batch scenarios executed within the 8-hour operational window. However, follow-on validation and closure actions remained dependent on completion of open performance related items and CSEA review processes. Interface readiness also remained a constraint, with multiple January working sessions documenting that mainframe-to-KROM file transfer testing continued to encounter issues requiring IBM support (including JESFTP handling and dataset formatting constraints). This issue slowed end-to-end validation and contributed to ongoing schedule pressure. Regarding the month-end job disruption noted in December, January reporting indicates that UAT was able to restart and progress following resolution activities, and the project shifted focus toward sustained UAT execution, interface testing, and pending MOU acceptance activities. Finally, Precisely was no longer identified as an active schedule driver in January, with January meeting notes indicating the Precisely issue was resolved and attention shifted to the remaining interface and testing dependencies.

JANUARY 2026 . KROM PROJECT

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
R	Y	Y	People Team, Stakeholders, & Culture Cont.	**Culture:** The collaborative culture between CSEA and ProTech remains unfaltering in January. Both are open to working together, are adaptable to each other's concerns and needs, and show shared accountability throughout the reporting period. Both teams demonstrated consistent communication and coordination to support one another in overcoming challenges and maintaining progress. **Risk Conclusion:** The people dimension risk has remained **yellow.** The primary project teams continue to demonstrate strong teamwork, collaboration, and effective communication. However, delays in the coordination of issue resolution with IBM have impacted User Acceptance Testing (UAT) and introduced schedule variances.

Process
Approach
& Execution

Process: January project governance and new delivery processes shifted from being defined in December to being enforced and consistently followed throughout January.

- Defects and issues continued to be managed through Jira, providing traceability for identification, prioritization, retest, and closure activities.
- Formal deliverable and MOU acceptance processes were used to manage SIT close-out and CSEA validation, including submission of acceptance packages and tracking of pending approvals.
- Testing and interface activities were governed through defined execution and reporting processes, supported by scheduled working sessions, documented testing artifacts, and recurring status reporting. These processes provided structure, visibility, and control over execution activities during the reporting period, without changes to the underlying process framework.

Approach: During January, the project adopted a sequenced execution approach to balance progress with unresolved dependencies.

- UAT execution was intentionally restarted in a controlled manner, prioritizing defect retesting and validation of corrected items while deferring activities dependent on unresolved interface and batch constraints. This allowed measurable quality progress to continue without masking known issues.
- The team also applied a risk-managed acceptance approach, advancing SIT close-out by formally submitting SIT MOU Part 2 while explicitly excluding interface and untested batch items that remained dependent on external fixes.
- Performance validation was treated as a monitor-and-proceed condition, supported by evidence that batch execution met the 8-hour window, rather than a gating blocker to continued testing.

Execution: January execution demonstrated measurable forward progress in testing, defect closure, and acceptance activities. Some execution outcomes remained uneven across workstreams, with interface readiness and external dependencies continuing to constrain end-to-end completion and formal phase closure.

Defect and Issue Handling: During January, defect and issue handling execution focused on restarting UAT and progressing retest and closure activity following earlier blocking conditions.

- UAT execution resumed and advanced to 76% of scripts passed, with 70 active UAT defects remaining at the month's end.
- Targeted retesting efforts resulted in 22 defects retested, of which 18 were formally closed through the Jira workflow, demonstrating active execution of the defect lifecycle rather than backlog accumulation.
- Despite progress, defect handling remained constrained by blocked items and dependencies tied to interface readiness and external vendor fixes, which limited testing throughput and prevented full closure of SIT-related items.

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
			Process Approach & Execution	**Execution:** **Requirement Validation Process:** Requirements validation activities during January were primarily conducted through UAT script execution and CSEA-led validation, rather than new requirements intake. • CSEA continued validation using the approved UAT test scripts, with execution progressing across functional areas as defects were resolved and environments stabilized. • Acceptance Testing execution reached 67% complete, while overall Acceptance Testing (inclusive of preparation and rework) reached 83% complete per the integrated schedule. • Formal validation remained incomplete at the end of the month due to open functional defects, blocked test scenarios, and incomplete interface coverage, preventing full confirmation of requirements satisfaction across all end-to-end flows. **Mainframe Interface Process:** Mainframe and interface execution remained a critical focus area in January, with teams actively running batch jobs using JCLs and testing interface file transfers to support end-to-end validation. • Multiple interface working sessions documented continued execution and troubleshooting of mainframe-to-KROM file transfers, including handling of JESFTP behavior, dataset formatting, and sequencing constraints. • Batch performance execution demonstrated compliance with the 8-hour operational window. Interface execution remained partially constrained by IBM-owned fixes and unresolved dataset handling issues, limiting the ability to complete full system-wide validation and contributing to continued schedule pressure. **Risk Conclusion** The risk rating for the process dimension remains **yellow,** with a trend upward. There was measurable improvement in execution and governance during the reporting period. Enhanced defect management through CSEA's ownership of Jira, formalized requirements, and MOU acceptance processes. While UAT execution advanced and defect closure activity increased, schedule risk persisted due to extended UAT timelines, incomplete interface validation, and unresolved dependencies, primarily tied to IBM-owned interface and batch execution issues.

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Technology System, Data, & Security	As of the end of January 2026, the overall status of technical activity milestones were reported as follows:

KEIKI Technical Milestone Variance & Dependency Summary

Technical Activity / Milestone	Approved Finish	Forecast Finish (Jan)	Variance (Days)	% Complete	Dependency / Impact Summary
System Installation Phase	12/5/2025	2/6/2026	+63	98%	Substantially complete; residual activities tied to operational and interface close-out do not independently block UAT but prevent full phase closure.
System Integration Testing (SIT)	12/10/2025	2/27/2026	+79	94%	SIT not formally closed; dependent on interface execution, untested batch jobs, and State acceptance of SIT MOU Part 2.
SIT MOU – Part 2	12/10/2025	Pending Acceptance	–	N/A	Submitted 01/15/2026; Daily Task Process and Performance Defect Resolution pending State validation.
Batch Performance Validation	12/23/2025	Completed (Jan)	–	100%	Batch execution validated within 8-hour window; 15 latencies require monitoring but no longer gate UAT execution.
Interface File Transfer Process	12/23/2025	2/27/2026	+66	77%	On the critical path; IBM-owned interface fixes and dataset handling issues constrain end-to-end testing.
Acceptance Test Phase (UAT)	2/26/2026	5/12/2026	+75	83%	Execution extended due to defect resolution, blocked scenarios, and interface dependencies.
Acceptance Testing – Execution	2/26/2026	5/12/2026	+75	67%	76% of scripts passed; blocked functional scenarios prevent completion.
System Acceptance Test Results (D-13)	2/26/2026	5/12/2026	+75	0%	Dependent on completion of UAT execution and State review.
Implementation Phase	3/18/2026	5/17/2026	* +60	61%	Dependent on acceptance results and Go/No-Go readiness.
Training (D-12)	2/11/2026	3/16/2026	+33	37%	Dependent on updated documentation and stabilized UAT outcomes.
Go-Live / Go-No-Go (D-18)	3/3/2026	5/17/2026	+75	0%	Dependent on UAT completion, interface closure, and formal readiness certification.

Dependency Impact Summary

Technical progress in January remained constrained by incomplete interface readiness and external vendor dependencies, particularly IBM-owned mainframe and batch execution items. While core system installation and batch performance validation stabilized, end-to-end testing and formal SIT closure continued to depend on resolution of interface issues, untested batch jobs, and CSEA acceptance activities, limiting the ability to fully complete downstream testing milestones and contributing to continued schedule risk.

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Technology System, Data, & Security Cont.	

System:

As of the end of January, overall system maturity continued to advance, with the System Installation Phase reported at 98% complete and core platform functionality available to support continued testing. System stability improved through validated batch performance and resumed UAT execution; however, formal system readiness remained constrained by incomplete interface validation, pending SIT MOU acceptance, and unresolved dependencies required for full end-to-end processing. As a result, the system remained functionally usable but not acceptance-ready at month end.

Defect Category	Start of January	End of January	Net Change
SIT – Functional	1	0	–1
SIT – Performance	12	15	3
UAT – Functional	86	70	–16
Total Open Defects	99	85	–14

During January, the system defect profile showed net improvement, driven by closure of the final SIT functional defect and a reduction in open UAT functional defects following UAT restart and retesting activities. This improvement was partially offset by an increase in documented SIT performance defects, which were identified and tracked as part of expanded performance validation efforts rather than new functional regressions.

Data:

- ***Data Extracts and Validation*:** During January, data validation activities continued in support of UAT execution and interface testing. Data extracts were actively used to validate functional scenarios, defect fixes, and batch processing results, with CSEA continuing to perform validation using approved UAT scripts and test data sets. While data quality supported resumed testing, full end-to-end data validation remained constrained by incomplete interface execution and untested batch jobs, limiting confirmation across all downstream systems.

- ***Mainframe Data Exchange and CyberFusion:*** Mainframe data exchange activities progressed through January with continued execution and troubleshooting of file transfer and batch interfaces between KROM and the CSEA mainframe. Interface working sessions focused on resolving dataset handling, JESFTP processing, and sequencing issues required to enable end-to-end validation. CyberFusion-related activities supported monitoring and coordination of mainframe data flows; however, interface readiness remained incomplete, and several data exchange scenarios continued to depend on IBM-delivered fixes and partner coordination before full validation could occur.

NOV	DEC	JAN	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Technology System, Data, & Security Cont.	**Data:** • ***Data Performance and Replication:*** Performance readiness improved in January as batch execution was validated within the required 8-hour operational window, including high-volume scenarios. Replication and infrastructure-related activities supported continued testing and monitoring, with performance artifacts documenting execution timing and stability. While performance was no longer a gating blocker, 15 documented performance latencies and reliance on specific infrastructure configurations required continued monitoring through UAT and prior to go-live. • ***Data Readiness and Ongoing Tasks:*** Data readiness and operational activities continued to progress during January, with batch and daily operational processes remaining substantially complete. The Daily Task Process advanced to acceptance review status, with supporting evidence submitted as part of SIT MOU Part 2 on January 15, 2026, indicating readiness for operational use but pending formal CSEA validation. As of the month-end, the System Installation Phase summary remained at 98% complete, reflecting residual interface and close-out dependencies rather than gaps in core data or batch processing capability. Data-related operational readiness, therefore, remained functionally complete but procedurally open at the end of January, with formal closure dependent on completion of interface validation and CSEA acceptance activities rather than additional execution work. **Security:** Security-related activities remained stable during January, with no new security defects or incidents reported. Single Sign-On (SSO) configuration and validation activities were completed, and supporting evidence was finalized; however, formal CSEA acceptance of SSO has not yet occurred by January 30, 2026. As a result, SSO was technically complete but procedurally open at the end of the January reporting period. Overall security readiness continued to depend on completion of remaining testing, interface validation, and formal acceptance activities prior to go-live. **Risk Conclusion:** Technical risk remained **yellow** at the end of January, driven by critical path dependencies associated with incomplete interface readiness, continued UAT execution, and pending formal SIT closure. Although system installation and batch performance stabilized and no new security issues were identified, unresolved interface validation continues to constrain end-to-end testing and directly impacts System Acceptance Results and Go/No-Go readiness.

OPEN OBSERVATIONS- Current Month Updates

OBSERVATION #: 2025.09.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: PROJECT MANAGEMENT SCHEDULE REPORTING

Observation: Project Management Schedule Reporting: Currently the project is in the User Acceptance Testing (UAT) phase. A MOU was signed in August 29, 2025, outlining the remaining System Integration Testing activities that are outstanding and expected completion dates. In addition, other issues such as critical severity defects have been identified and must be resolved prior to go-live. These SIT activities and defects are not clearly visible in the project schedule.

Industry Standards and Best Practices: PMBOK® 7th Edition Section 2.4.7 CSEA's changes should follow a change control process, reprioritizing the backlog, or rebaselining the project.
Section 2.4.9 Alignment states that there should be an integrated project management plan.
Analysis: Tracking of important dates and deadlines should be centralized and reflected in the project schedule for maintenance, tracking, and visibility purposes. These dates and deadlines could be missed or issues remain unresolved.

Recommendation(s): To mitigate these risks, the following are recommended:

CLOSED: 2025.09.001.R1- Add MOU Activities to the Project Schedule or Other Presented Project Documents

- Add PCR-9's MOU activities to the Project Schedule or any of the presented project documents. Where feasible, activities may be aggregated and reported as a percentage complete. Use clear, descriptive labels (i.e. SIT defect, MOU 2.2, etc.) to ensure easy identification and traceability.

2025.09.001.R2- Assess Critical Path Impact of MOU Activities

- The MOU specifies activities that are due by December 18th, confirm if any of the activities are on the critical path especially since UAT ends on January 2, 2026. Update the Project Schedule, as necessary.

2025.09.001.R3-Tracking of critical severity/major priority defects

- Add critical severity/major-priority defects and related timelines to the Project Schedule or related presented project documents. Include the defect number for tracking purposes. And include any staff or team members that are assigned to the defects or activities.

CLOSED: 2025.09.001.R4- Defects Reporting for Parent-Child Rollups

- For UAT defects, enhance Jira reporting to include parent-child rollups defect counts (to show root cause across multiple test scripts). Also add if currently maintained and feasible, estimated resolution date or time, defect discovery date, and linkage to schedule impacts for critical severity, highest priority, "show-stopper" defects. Add or include this Jira report to any of the regularly presented project documents as part of the defect management process.

OBSERVATION #: 2025.09.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: PROJECT MANAGEMENT SCHEDULE REPORTING CONT.

Status Update: 1/30/2026

2025.09.001.R2/R3- Integrated Schedule Visibility for MOU Activities and Critical Severity/Major Priority Defects **Status**: Remains open

During January, improvements were observed in the communication of schedule forecasts and downstream impacts, including clearer articulation of extended UAT execution timelines and a revised May 17, 2026 go-live projection communicated in late-January stakeholder updates. However, remaining MOU activities and critical interface-dependent obligations are still not fully integrated into the Integrated Master Schedule (IMS) with explicit linkage to critical path milestones.

Integrate remaining MOU activities and critical severity/major priority defects into the Integrated Master Schedule or formally presented project documents, with clear linkage to milestones and the critical path. This will ensure transparent visibility into how unresolved obligations and blocking defects affect UAT completion, System Acceptance, and Go/No-Go readiness.

- Identify whether remaining MOU activities are on or off the critical path, including any impact to UAT completion, System Acceptance (D-13), and Go/No-Go (D-18).
    - Represent critical and blocking defects as schedule-relevant items, including:
    - Defect ID (or reference),
    - Associated activity or deliverable,
    - Responsible owner/team, and
    - Expected resolution or validation window.
    - Provide sufficient traceability to allow stakeholders to understand how unresolved MOU obligations and critical severity/major priority defects influence schedule realism and downstream readiness decisions.

    Where full task-level decomposition is not feasible, aggregated schedule activities or companion reporting artifacts may be used, provided the impact to milestones and critical path is clearly documented and routinely maintained.

While SIT MOU Part 2 (Daily Task Process and Performance Defect Resolution) was formally submitted for CSEA acceptance on January 15, 2026, the associated activities continue to be represented at a high-level or static CSEA in the schedule, limiting visibility into their current execution status, acceptance dependencies, and downstream impact to System Acceptance (D-13) and Go/No-Go (D-18).

As a result, although schedule communication improved during January, the IMS does not yet provide full traceability between unresolved MOU obligations, interface dependencies, critical defect resolution, and their critical-path impacts, and this observation remains open.

OBSERVATION #: 2025.08.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: IMPLEMENTATION PHASE GATING

Observation: Implementation Phase Gating: System Installation Testing (SIT) should be completed with no open defects prior to entering UAT. PCR-9 allows for the project to enter the Implementation Phase prior to completing SIT activities including unresolved defects and untested batch jobs.

Industry Standards and Best Practices: SWEBOK v3.0 Chapter 5 recommends that System testing is performed before acceptance testing to ensure that the system meets its specified requirements.
ISO/IEC 27001 Annex A.14.2.9 CSEAs that System acceptance testing procedures must be completed and reviewed to ensure all functional and security requirements are met before user acceptance tests are conducted.

Analysis: Initiating UAT while system testing is still underway introduces risk. Although ProTech has assured CSEA that there would be no conflicts with UAT, higher priority or severity defects may be uncovered during UAT that may interfere with completing the SIT defects on schedule. This dual focus strains resources, as teams are forced to juggle defect resolution and UAT execution simultaneously and it may result in the inefficient use of personnel and delays.

Recommendation(s): To mitigate these risks the following are recommended:

2025.08.001.R1-Define Plans and Set Up Checkpoints to Monitor Progress
- As deadlines have been assigned, ensure that there are defined plans and set up checkpoints to ensure the assignees have a road map and progress can be monitored.

CLOSED: 2025.08.001 R2- Track Defects and Prioritize
- Track defects rigorously, prioritizing resolution to stabilize the system as quickly as possible

CLOSED: 2025.08.001 R3- Prepare to Deploy Staffing Upon SIT Completion
- Adjust the UAT schedule and staffing to ensure resources are deployed effectively once the system is ready.

2025.08.001.R4-Prepare UAT Documentation and SIT Contingency Plan(s)
- Prepare test teams with updated documentation, defect status reports, and contingency plans to resume UAT efficiently once the system testing is complete.

OBSERVATION #: 2025.08.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: IMPLEMENTATION PHASE GATING CONT.

Status Update: 1/30/2026

2025.08.001.R1- Define Plans and Set Up Checkpoints to Monitor Progress **Status**: Remains open

During January, execution planning and checkpoint visibility improved incrementally through more frequent stakeholder communications and clearer articulation of revised testing timelines, including updated UAT execution and go-live forecasts. However, formal consolidation of SIT close-out activities, MOU obligations, and interface-dependent work into a single, authoritative execution plan or schedule view has not yet occurred.

While SIT MOU Part 2 was formally submitted for CSEA acceptance on January 15, 2026, acceptance was granted on 1/28/2026 , the remaining interface and batch dependencies continued to be tracked across multiple artifacts rather than through a unified execution checkpoint structure. As a result, visibility into readiness sequencing and gating criteria remains fragmented, and this recommendation remains open.

2025.08.001.R4- Prepare UAT Documentation and SIT Contingency Plan(s) **Status**: Remains open

UAT execution resumed and advanced during January; however, formal contingency planning for continued UAT execution in parallel with incomplete SIT closure has not been finalized or documented.

While teams operated under managed conditions and adjusted execution sequencing as dependencies emerged, a consolidated, documented contingency plan addressing extended UAT timelines, interface delays, and acceptance sequencing was not completed by month end. IV&V will continue to monitor this item while SIT acceptance and interface validation activities remain open.

OBSERVATION #: 2024.06.001	STATUS: CLOSED	TYPE: RISK	SEVERITY: Moderate

TITLE: DATA EXTRACTION AND MIGRATION

Observation: There is a risk for delays in the data extraction process, which is critical for the cutover activities, due to reliance on shared mainframe resources, inefficiencies in data extraction programs, and long download/upload times. This could impact the project by increasing costs, compromising the quality of the overall solution, and causing operational downtime of 4 to 5 days during the cutover weekend, thereby extending the project timeline.

Industry Standards and Best Practices: : IEEE 1012-2016 Emphasis: Verification ensures that the system is built correctly according to its specifications.

IEEE 1012-2016 Emphasis: Validation ensures that the system meets its intended use and satisfies user needs.

IEEE 1012-2016 Emphasis: Risk management is integrated into the IV&V process to identify potential risks and implement mitigation strategies.

IEEE 1012-2016 Emphasis: Resource management is crucial for the successful execution of project activities.

Analysis: The data extraction process is critical for the cutover activities and current projections show potential for significant delays. This issue results from reliance on shared mainframe resources, inefficiencies in data extraction programs, and long download/upload times. Each time new data is needed for testing, the entire database must be extracted, which is time-consuming. CSEA is evaluating a SQL replication strategy to replace the current process and has assigned two dedicated resources to identify and test this approach. Daily meetings with DDI and CSEA have been established to collaborate on this issue. The target for validating this approach is July 31st.

The static data collected from the data extract process projects a worst-case scenario of 12 to 36 days to fully extract ADABAS data to the 374 flat files, including downloading and uploading the files. This arises due to: 1) CSEA uses a shared mainframe, 2) inefficiencies of data extraction programs, 3) download/upload times. The data extract process is central to the cutover activities completing over Fri/Sat/Sun. If not improved, CSEA may face 4/5 days operational downtime for cutover weekend.

Recommendation(s): To mitigate these risks the following are recommended:

2024.08.001.R1 - Verification of Data Extraction and Conversion Processes

- Implement a thorough verification process for all data extraction and conversion methods, particularly the Ascii to BCP script conversions. Establish checkpoints where the file counts and conversion accuracy are verified before moving to subsequent phases of the project to avoid potential issues in later stages.

2024.08.001.R2 - Validation of Extracted Data Consistency

- Conduct end-to-end validation of the extracted data, ensuring that the SQL-to-SQL comparisons are consistent and match across systems (Protech and CSEA). Given the noted discrepancies, a validation step should be introduced after each major extraction and conversion task (e.g., Task 18). This will confirm that the extracted data matches the expected output and is usable for further processing.

OBSERVATION #: 2024.06.001	STATUS: CLOSED	TYPE: RISK	SEVERITY: Moderate

TITLE: DATA EXTRACTION AND MIGRATION CONT.

Recommendation(s) (continued):

2024.08.001.R3 - Risk Management for Binary and Ascii File Handling

- Assess the risks associated with the conversion and handling of binary and Ascii files. Discrepancies in binary file counts and the use of converters for 27 files were discussed. It is recommended to perform risk analysis on these conversions, ensuring that any potential data corruption or loss during conversion is identified and mitigated. Consider implementing additional testing and validation for these specific files.

CLOSED: 2024.08.001.R4 - Resource Management and Space Availability

- The observation regarding potential space risks should be taken seriously. Conduct a resource assessment to ensure that there is sufficient storage and computing resources to handle the extraction, conversion, and processing of data. This should be done before the extraction process begins, with contingency plans in place in case of resource shortages.

Status Update: 1/30/26

2024.06.001.R1 / R2 - Verification & Validation of Data Extraction and Exchange Processes **Status**: Closed
Verification activities have been executed through prior extraction validation and stabilized data sets now supporting downstream testing. No new extraction or conversion failures were reported in January.

2024.08.001.R3 - Risk Management for Binary and ASCII File Handling **Status:** Closed
Data consistency validation is being performed through UAT execution and defect management processes, with no open defects attributed to data extraction or conversion inconsistencies.

OBSERVATION #: 2024.03.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: INTERFACE PLANNING AND FLEXIBILITY CONT.

Observation: The timing of other CSEA of Hawaii modernization projects impacts the ability to properly design KEIKI system interfaces and will necessitate the need for interface modifications after its deployment, which can lead to additional costs, delays, and disruption to the system.

Industry Standards and Best Practices: N/A

Analysis: CSEA's KEIKI system currently relies on a legacy cyberfusion system running on CSEA's mainframe for system file and data exchanges with multiple CSEA of Hawaii agencies. The timing of multiple agencies moving off the mainframe at different times will result in the need to modify KEIKI system interfaces after the system has been deployed. Until other CSEA modernization projects are completed, the KEIKI project cannot perform server-based data exchanges and will need to continue to interface via the mainframe.

In addition, as the KEIKI project involves integrating a modernized child support system with existing legacy systems, there may be other technological and architectural gaps that arise. These gaps can include differences in technology stacks, such as programming languages, database systems, and operating environments, as well as the absence of modern application programming interfaces (APIs) in the legacy systems. Based on the timing of concurrent CSEA of Hawaii modernization projects and upgrades, the end-to-end testing of the KEIKI system may necessitate the undertaking of supplementary tasks, allocation of additional resources, and coordination efforts.

Recommendation(s): To mitigate these risks the following are recommended:

CLOSED: 2024.07.001.R1 – It was recommended that CSEA meet with the new Chief Data Officer and also meet with the EFS team to identify any potential impacts to CSEA and align with IT policies.

CLOSED: 2024.03.001.R1 – CSEA should coordinate regular meetings with impacted CSEA of Hawaii agencies.

- Roles, responsibilities, expectations and interface requirements should be clearly defined to ensure information and project status is proactively communicated for the various modernization efforts.

OBSERVATION #: 2024.03.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Low

TITLE: INTERFACE PLANNING AND FLEXIBILITY

Recommendation(s) cont.:

2024.03.001.R2 – The projects should properly plan for interfaces so that they are flexible enough to accommodate future changes and are compatible with other agencies.

- Clearly identify all the interfaces that the system will interact with and how they will communicate.
- Develop interfaces and data structure that are flexible enough to accommodate changes to the interfaces.
- Detailed testing will be required as the various departments upgrade their systems to ensure compatibility.

Status Update: 1/30/2026

2024.03.001.R2- Interface execution and validation activities - Interfaces in scope for current execution have been identified and implemented. However, future CSEA flexibility will remain dependent on external modernization timelines beyond the project's direct control. The recommendation will remain applicable as a long-term risk mitigation measure rather than a near-term execution blocker.

January execution demonstrated that interface planning and execution are sufficient to support current testing and readiness activities, and governance mechanisms are in place to manage coordination with impacted agencies. However, because the risk is tied to future changes in external systems, it has not been fully eliminated.

Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

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

TERMS

RISK
An event that has not happened yet.

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

Criticality Rating

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

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

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

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

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

Severity Rating

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

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

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

SEVERITY 1: High/Critical level

SEVERITY 2: Moderate level

SEVERITY 3: Low level

TERMS

POSITIVE
Celebrates high performance or project successes.

PRELIMINARY CONCERN
Potential risk requiring further analysis.

Appendix B: Industry Standards and Best Practices

STANDARD	DESCRIPTION
ADA	Americans with Disabilities Act
ADKAR®	Prosci ADKAR: Awareness, Desire, Knowledge, Ability, and Reinforcement
BABOK® v3	Business Analyst Body of Knowledge
CMMI-DEV v2.0	CCMI ® - Integrated performance solution framework
DAMA-DMBOK® v2	DAMA International's Guide to the Data Management Body of Knowledge
PMBOK® v7	Project Management Institute (PMI) Project Management Body of Knowledge
SPM	PMI The Standard for Project Management
PROSCI ADKAR®	Leading organization providing research, methodology, and tools on change management practices
SWEBOK v3	Guide to the Software Engineering Body of Knowledge
IEEE 828-2012	Institute of Electrical and Electronics Engineers (IEEE) Standard for Configuration Management in Systems and Software Engineering
IEEE 929-2012	Institute of Electrical and Electronics Engineers (IEEE) Standard for Software and System Test Documentation
IEEE 1062-2015	IEEE Recommended Practice for Software Acquisition
IEEE 1012-2016	IEEE Standard for System, Software, and Hardware Verification and Validation
IEEE 730-2014	IEEE Standard for Software Quality Assurance Processes
ISO 9001:2015	International Organization for Standardization (ISO) Quality Management Systems – Requirements
ISO/IEC 25010:2011	ISO/International Electrotechnical Commission (IEC) Systems and Software Engineering – Systems and Software Quality Requirements and Evaluation (SQuaRE) – System and Software Quality Models
ISO/IEC 16085:2021	ISO/IEC Systems and Software Engineering – Life Cycle Processes – Risk Management
IEEE 16326-2019	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Processes – Project Management
IEEE 29148-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Processes – Requirements Engineering

STANDARD	DESCRIPTION
IEEE 15288-2023	ISO/IEC/IEEE International Standard – Systems and Software Engineering – System Life Cycle Processes
IEEE 12207-2017	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Software Life Cycle Processes
IEEE 24748-1-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Management – Part 1: Guidelines for Life Cycle Management
IEEE 24748-2-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Life Cycle Management – Part 2: Guidelines for the Application of ISO/IEC/IEEE 15288 (System Life Cycle Processes)
IEEE 24748-3-2020	IEEE Guide: Adoption of ISO/IEC TR 24748-3:2011, Systems and Software Engineering – Life Cycle Management – Part 3: Guide to the Application of ISO/IEC 12207 (Software Life Cycle Processes)
IEEE 14764-2021	ISO/IEC/IEEE International Standard for Software Engineering – Software Life Cycle Processes – Maintenance
IEEE 15289-2019	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Content of Life Cycle Information Items (Documentation)
IEEE 24765-2017	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Vocabulary
IEEE 26511-2018	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Requirements for Managers of Information for Users of Systems, Software, and Services
IEEE 23026-2015	ISO/IEC/IEEE International Standard – Systems and Software Engineering – Engineering and Management of Websites for Systems, Software, and Services Information
IEEE 29119-1-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 1: Concepts and Definitions
IEEE 29119-2-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 2: Test Processes
IEEE 29119-3-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 3: Test Documentation
IEEE 29119-4-2021	ISO/IEC/IEEE International Standard – Software and Systems Engineering – Software Testing – Part 4: Test Techniques
IEEE 1484.13.1-2012	IEEE Standard for Learning Technology – Conceptual Model for Resource Aggregation for Learning, Education, and Training
ISO/IEC TR 20000-11:2021	ISO/IEC Information Technology – Service Management – Part 11: Guidance on the Relationship Between ISO/IEC 20000-1:2011 and Service Management Frameworks: ITIL®
ISO/IEC 27002:2022	Information Technology – Security Techniques – Code of Practice for Information Security Controls
ITIL v4	PeopleCert- ITIL ® Foundation – IT governance and service management

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

Appendix C: Comment Log on Draft Report

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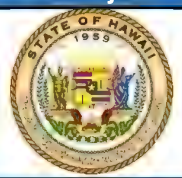
Comment Lo on t Repo t u

KROM Project: IV&V Doc ment Comment Log				
				
ID #	**Page #**	**Comment**	**Commenter's Organization**	**Acc ity Resol tion**
1	4	Key Progress: Second bullet: SIT MOU Part 2 was approved by CSEA on 01/28/2026.	CSEA	IV&V validated the document acceptance on 1/28/26 and has corrected the Key progress statement accordingly.
2	4	Key Risks: Second bullet: IBM does not own and interfaces, it merely does the code and logic conversion to enable successful execution of jobs.	CSEA	IV&V states: "There remain unresolved dependencies tied to IBM owned interface and batch execution issues." The keywords in the sentence definition are execution issues. The wording has been changed for clarity: interface and batch execution issues that IBM is responsible for correcting.
3 u	6	Project Schedule: Second paragraph, last sentence: System Test Results is a prerequisite and not a dependency.	CSEA	IV&V's reference is regarding Deliverable #21, the System Test Results Report which must have the System Testing activities completed prior to producing this deliverable. IV&V reviewed the January schedule and notes that there is no direct logic-based predecessor to Go-Live for this deliverable. In the January schedule, while Deliverable #21 may not be structured as a schedule dependency within the IMS, it remains a governance prerequisite for production readiness, and the potential risk warrants continued monitoring.

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ID #	Pag #	Commen	Commente 's Organiza ion	A ui y R solu ion
4	6	Project Schedule: Third paragraph: SIT MOU Part 2 was approved on 01/28/2026.	CSEA	IV&V validated the document acceptance on 1/28/26 and has corrected the Key progress statement accordingly.
5	7	Quality: First paragraph: SIT MOU Part 2 was approved on 01/28/2026.	CSEA	IV&V validated the document acceptance on 1/28/26 and has corrected the Key progress statement accordingly.
6 r	9	Risk Conclusion: Second sentence regarding the delays in stakeholder engagement in coordination with IBM is confusing.	CSEA	IV&V has restructured the sentence for clarity.
7 r	16	Observation 2025.09.001 has two open sub-recommendations that we recommend to close. • R2 wants the MOU items to be added to the Project Schedule. CSEA and Protech has done this as of the end of this reporting period. • R3 wants to add Jira defects that are severity critical or major to be added to the Project Schedule - this is unnecessary because the defects are already being tracked on Jira as well as the CSEA spreadsheets.	CSEA r	IV&V notes that with the acceptance of the SIT MOU Part 2 on January 28, 2026, and the confirmation that it was tracked in the January schedule R2 can be closed. However, R3 remains open, citing: Integrate remaining critical severity/major priority defects into the Integrated Master Schedule or formally presented project documents, with clear linkage to milestones and the critical path. This will ensure transparent visibility into how unresolved obligations and blocking defects affect UAT completion, System Acceptance, and Go/No-Go readiness. r These are best practice recommendations that substantiate the need for traceability across the entire project governance and for the creation of an audit trail. Until IV&V can validate full remediation of risk, R3 shall remain under monitoring. r

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ID #	Pag #	Commen	Commente 's Organiza ion	A ui y R solu ion
8 r	18	Observation 2025.08.0001 has two sub-recommendations that could be closed. • R1 wants to set up plans and checkpoints for ensuring that the open SIT defects are resolved. This has been done with the use of the MOU Acceptance documents. • r R4 wants to create documentation, status reports, and contingency plans for when SIT is finally completed. This has been made clear in the Project Schedule, specifically the 20 days reserved for the tail-end of UAT which is a separate schedule task contingent upon SIT completion.	CSEA	IV&V corrected the MOU status as accepted on 1/28/26. Recommendation R1 is speaking to visibility into readiness sequencing and gating criteria, which remain fragmented across project governance documents. While there has been improvement, full traceability cannot be validated at this time, so IV&V will continue to monitor this recommendation. Recommendation R4 speaks to the need for a consolidated, documented contingency plan addressing extended UAT timelines, interface delays, and acceptance sequencing. This would need to be transparent at a higher level than the task level, so that there is a common understanding of how each project objective is progressing in sync with each other and with the targeted go-live date. Limited visibility due to the record level of transparency across the governance documents can present a risk. IV&V will continue to monitor for higher visibility.
9 r	4 r	The January project invoice was not available at the time of the draft publication. As a result, the Project Budget was not updated on the dashboard and was noted as such.	Accuity IV&V	IV&V has received the January project invoice and has updated r the Project Budget section of the page 4 dashboard accordingly.

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