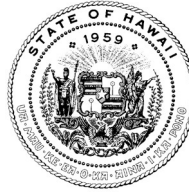


DAVID Y. IGE  
GOVERNOR



**DEPT. COMM. NO. 116**  
TODD NACAPUY  
CHIEF INFORMATION  
OFFICER

**OFFICE OF ENTERPRISE TECHNOLOGY SERVICES**

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December 11, 2018

The Honorable Ronald D. Kouchi,  
President, and  
Members of The Senate  
Twenty-Ninth State Legislature  
Hawaii State Capitol, Room 409  
Honolulu, Hawaii 96813

The Honorable Scott K. Saiki,  
Speaker, and  
Members of The House of Representatives  
Twenty-Ninth State Legislature  
Hawaii State Capitol, Room 431  
Honolulu, Hawaii 96813

Dear President Kouchi, Speaker Saiki, and Members of the Legislature:

Pursuant to HRS section 27-43.6, which requires the Chief Information Officer to submit applicable independent verification and validation 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 Hawaii Department of Health Hawaii BHA Integrated Case Management System Project Independent Verification and Validation (IV&V).

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 black ink, appearing to read "Todd Nacapuy".

TODD NACAPUY  
Chief Information Officer  
State of Hawai'i

Attachment (2)



# Hawaii BHA Integrated Case Management System Project

*Final IV&V Report for the period of  
October 1 - 31, 2018*

# Overview

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- Executive Summary
- IV&V Activities
- IV&V Findings and Recommendations
- Appendices
  - A – Findings and Recommendations Log
  - B – Inputs

# Executive Summary

Overall Project Health:



*The overall project health remains Yellow, a caution rating, due to unassigned BHA Leads who are dedicated to Implementation Phase activities, unclear service level agreements to be achieved, inconsistent documentation to support requirements validation, the time available during cutover to remediate errors in the data migration files, and outstanding detailed resource planning and analysis to support the OCM Plan. Four findings were closed during this reporting period and four new findings were opened. Thus far, the project remains on schedule for Phase 1 deployment.*

Aug 18	Sept 18	Oct 18	Process Areas	IV&V Observations	Overall Health
			Project Management	This process area continues to be rated Yellow since the IAPD for Phase 2 is pending approval from CMS; detailed planning continues for deployment activities; BHA resource requirements for deployment tasks have not been confirmed; agreed upon service level agreements are unclear.	
			Requirements Management	IV&V completed a Part 2 requirements traceability evaluation for 25% of the requirements and flagged 9% for further research. After review with DOH and the vendor, IV&V has opened two new findings in this process and has increased the severity to Yellow, or Caution.	
			Design and Development	Iteration 5 has completed and the Development Phase has ended. IV&V closed Issue #21 – Architecture Blueprint and Roadmap since the project has approved this deliverable. IV&V has opened finding #38 to address the documentation gap for service level agreements.	

# Executive Summary

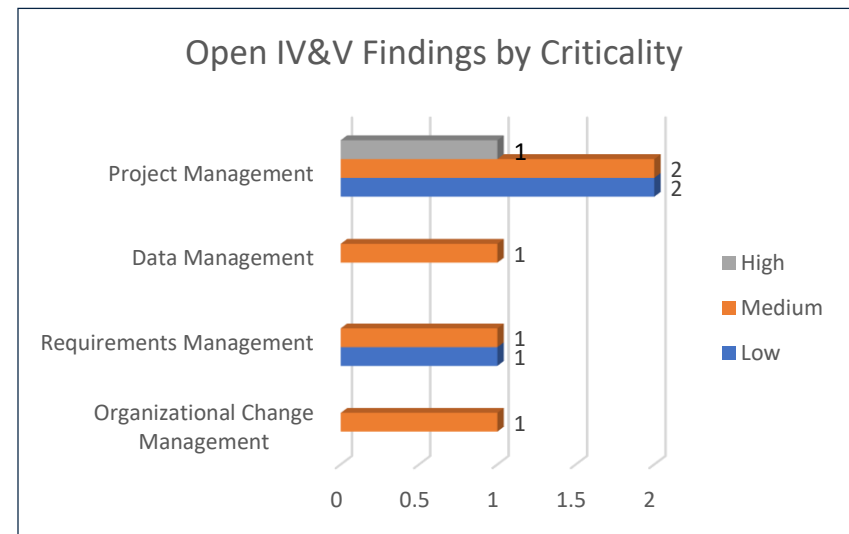
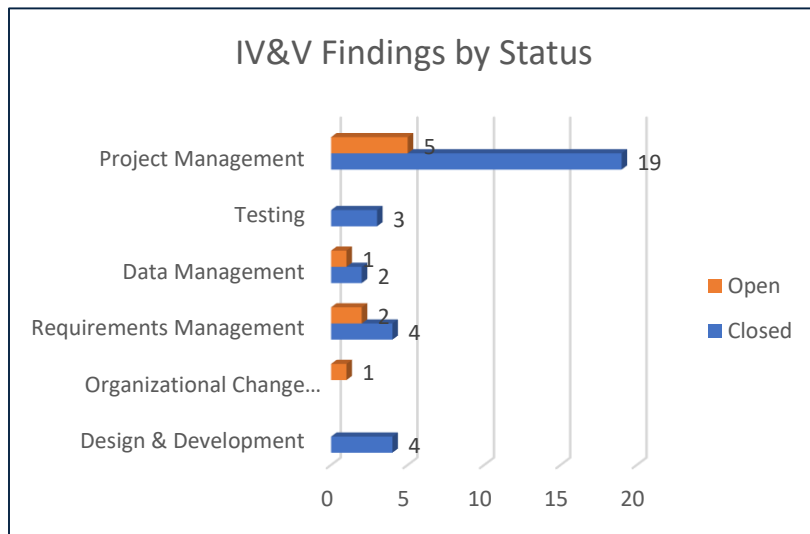
Aug 18	Sept 18	Oct 18	Process Areas	IV&V Observations	Overall Health
M	M	L	Testing	The migration to the Government Cloud was successfully completed in October 2018 and, though the UAT Cycle 2 testing duration was shortened due to the migration, the project was able to commence with testing activities and stay on schedule. The project provided pre-UAT training for Cycle 3 testers and is preparing for the broader system, regression, and performance testing activities.	G
M	M	M	Data Management	The project has approved the Data Management Plan and DOH has made significant progress in loading the minimum set of data. However, the extended efforts of the project in this area raise concern regarding the project's ability to resolve data migration issues during the cutover window when there is considerably less time available to the team before go live.	Y
H	M	M	Organizational Change Management	The OCM Plan released in October provides a high-level strategy to support end user adoption; it outlines the approach that will be taken by the state to guide end users to transition to the new case management system but is still absent the details regarding specific roles and responsibilities, timeline information, metrics for measuring and assessing the transition, communication and escalation procedures, and the processes to be employed. Without a completed OCM Plan, the project is unable to validate that the OCM activities can be aligned with the project's schedule or completed in a timely manner.	Y

# Executive Summary

As of this reporting period, IV&V has 9 open findings: there are 4 Risks (all medium) and 5 Issues (1 high, 1 medium and 3 low).

IV&V closed 3 findings (all medium Issues).

To date, IV&V has identified 41 findings in total: 10 issues, 25 risks, and 6 observations) on the Hawaii BHA Integrated Case Management System Project; and 32 findings have been closed.



See Appendix C for trend data related to IV&V's monthly ratings for findings and overall project health.

# IV&V Findings and Recommendations

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## Process Areas Reviewed

Throughout this project, IV&V will verify and validate activities performed in the following process areas:

- Project Management
- Requirements Management
- Design and Development
- Testing
- Data Management
- Organizational Change Management

# IV&V Findings and Recommendations

## Project Management

#	Key Findings	Criticality Rating
5	<b>Late-game analysis of requirements awaiting details from external sources:</b> [Lead Entity: Vendor] The project has completed Iteration 5 and a code freeze for new development is now in effect. <b>IV&amp;V has closed this issue</b> since any further analysis of requirements will not impact the development timeline for Phase 1.	
19	<b>Access to enhanced federal funding may impact the project budget and/or scope:</b> [Lead Entity: State] The project awaits feedback from CMS regarding the IAPD submitted in September 2018. There is increasing risk that the duration of CMS' review will hinder the project's timeline. Meanwhile, the state continues to work on finalizing the MOA.	M
33	<b>Execution of project activities occurring prior to approval of respective plans:</b> [Lead Entity: State] The project has completed most of the high-level planning to support the Implementation Phase and the Iteration 0 deliverables are in the final approval stages. However, the project continues to collaborate on planning the detailed activities and define the roles and responsibilities which support the project plans while the activities are occurring. For example, 'project champions' are now engaged in UAT and Training activities yet these details are still pending for the OCM Plan.	L
34	<b>Unassigned BHA Lead resources may slow project progress:</b> [Lead Entity: State] Since this risk was opened, three full-time resources have been added to the DOH team (two at CAMHD, one at DDD). The BHA resource requirement to satisfy all activities outlined in the deployment schedule and OCM Plan have not been confirmed and current BHA Leads are multi-tasking across project areas.	M
38	<b>NEW Issue! Service Level Agreements (SLA's) are unclear in the RSM contract:</b> [Lead Entity: State] SLAs were required by RFP Attachment 6, however RFP Attachment 6 was not included in the Final RSM contract. The RTM included in the contract depicts technical service levels, and points to the missing Attachment 6. Agreed-to service levels are necessary for all projects to measure success.	H



# IV&V Findings and Recommendations

## Project Management (cont'd)

#	Key Findings (cont'd)	Criticality Rating
41	<b>NEW Issue! Discrepancies in project documentation have been identified in several project deliverables or work products:</b> [Lead Entity: Vendor] The system documentation regarding custom code elements is scheduled to be delivered in early January; details for SLAs across work products are unclear; varying formats or methods for documenting requirement and user stories in TFS. The lack of sufficient documentation poses risk to DOH's ability to validate that requirement have been correctly met, to communicate and work with end users appropriately, and to support the system once its been implemented into production.	L

Recommendations	Progress
<ul style="list-style-type: none"> <li>BHA to work closely with DHS to pursue available funding options.</li> </ul>	In process
<ul style="list-style-type: none"> <li>Focus on completing the detailed planning and documenting roles and responsibilities to support the deployment activities and post-launch</li> </ul>	In process
<ul style="list-style-type: none"> <li>Evaluate user stories (requirements) and requests being deferred to Phase 2 and analyze the impact of not having these features developed prior to go live</li> </ul>	In process
<ul style="list-style-type: none"> <li>BHA to initiate Transition Planning activities to identify DOH's support requirements and develop a plan for securing and training help desk staff prior to go live</li> </ul>	In process
<ul style="list-style-type: none"> <li>BHA to work within DOH to identify additional resources who can either work on the project or alleviate key project resources from their day-to-day (non-project) responsibilities so they can be fully allocated to the project until post implementation; alternatively, consider hiring temporary staff</li> </ul>	In process
<ul style="list-style-type: none"> <li>Determine and communicate the service level agreements intended to be in the contract and validate project activities support achieving or measuring them</li> </ul>	In process
<ul style="list-style-type: none"> <li>Itemize and prioritize the documentation areas that warrant review and revision before closing out Phase 1 and moving forward with Phase 2. Develop an action plan to remediate by the end of January 2019.</li> </ul>	In process

# IV&V Findings and Recommendations

## Requirements Management

#	Key Findings	Criticality Rating
36	<b>Many-to-one mapping of user stories to requirements increases the complexity of validation activities:</b> IV&V completed the requirements evaluation (part 2), analyzing 25% of the requirements and their associated user stories, to validate the process and anticipated outputs. The results were reviewed with DOH and RSM, and <b>IV&amp;V has closed this risk</b> in lieu of new findings #39 and #40 below.	
39	<b>NEW Issue! Requirements to user stories' associations are inconsistent within TFS:</b> As a component of IV&V's RTM validation effort for requirements to user stories, approximately 9% of the sample size (and thus, potentially the entire project) are missing required TFS relationships between requirements and all user stories. Incomplete traceability can cause missing requirements in the software.	L
40	<b>NEW Risk! A subset of contractual Requirements may not be fully included in user stories or the developed / configured BHA-ITS software:</b> As component of IV&V's RTM validation effort for requirements to user stories, IV&V identified requirements that are not included in user stories and/or the BHA-ITS software. Until further review of documentation from the vendor, initial RTM efforts indicate that this may affect upward of 9% of the sample reviewed during the RTM effort.	M

Recommendations	Progress
<ul style="list-style-type: none"> <li>Address inconsistencies in requirements to user story relationships within TFS in order to ensure that complete requirements traceability is established for the project.</li> </ul>	Not started
<ul style="list-style-type: none"> <li>Address inconsistencies in requirements implementation in user stories and the BHA-ITS software and incorporate all requirements determined to be missing in both user stories and the BHA-ITS software solution.</li> </ul>	Not started

# IV&V Findings and Recommendations

## Design and Development

#	Key Findings	Criticality Rating
21	<b>Architecture Blueprint deficiencies:</b> The project approved the latest version of the Architecture Blueprint deliverables and accepted the risk associated with the documentation. <b>Therefore, IV&amp;V has closed this issue.</b> See new IV&V Issue #38 in the Project Management process area regarding service level agreements.	

# IV&V Findings and Recommendations

## Testing

#	Key Findings	Criticality Rating
35	<b>Inability to move to Government Cloud may impact the execution and quality of SharePoint Integration Testing:</b> The migration to the Government cloud was completed in October 2018. <b>IV&amp;V has closed this issue.</b>	M

# IV&V Findings and Recommendations

## Data Management

#	Key Findings	Criticality Rating
31	<b>Errors in the data migration files may impact the overall implementation schedule:</b> DOH has made significant progress in loading the minimum set of data but the project still continues to address data migration anomalies in preparation for deployment. Though there is regular, steady progress, the extended efforts of the project in this area raise concern regarding the project's ability to resolve data migration issues during the cutover window when there is considerably less time available to the team before go live.	M

Recommendations	Progress
<ul style="list-style-type: none"><li>Determine alternative methods for piloting, analyzing, and/or remediating data migration activities and outputs prior to or during the cutover period.</li></ul>	In process

# IV&V Findings and Recommendations

## Organizational Change Management

#	Key Findings	Criticality Rating
7	<b>Attention to User Adoption (buy-in):</b> The project released a draft OCM Plan in September which provides a high-level strategy to support user adoption. The OCM Plan outlines the approach that will be taken by the state to support end user adoption of the new case management system but lacks the details regarding specific roles and responsibilities, timeline information, metrics for measuring and assessing the transition, communication and escalation procedures, and the processes to be employed to facilitate adoption.	M

Recommendations	Progress
<ul style="list-style-type: none"><li>Complete the detailed activities, definitions of roles/responsibilities definitions, and development of process flows to support the deployment activities.</li></ul>	In process
<ul style="list-style-type: none"><li>Initiate an OCM forum which meets regularly to focus on the execution and mitigation of OCM-related activities</li></ul>	Not started

# Appendix A

*This appendix provides the details of each finding and recommendation identified by IV&V. Project stakeholders are encouraged to review the findings and recommendations log details as needed.*

- See Findings and Recommendations Log (provided under separate cover)
- Project Health Rating Definitions




- G**
  - The project is under control and the current scope can be delivered within the current schedule.
  - The project's risks and issues have been identified, and mitigation activities are effective. The overall impact of risk and issues is minimal.
  - The project is proceeding according to plan (< 30 days late).

- Y**
  - The project is under control but also actively addressing resource, schedule or scope challenges that have arisen. There is a clear plan to get back on track.
  - The project's risk and/or issues have been identified, and further mitigation is required to facilitate forward progress. The known impact of potential risks and known issues are likely to jeopardize the project.
  - Schedule issues are emerging (> 30 days but < 60 days late).
  - Project Leadership attention is required to ensure the project is under control.

- R**
  - The project is not under control as there are serious problems with resources, schedule, or scope. A plan to get back on track is needed.
  - The project's risks and issues pose significant challenges and require immediate mitigation and/or escalation. The project's ability to complete critical tasks and/or meet the project's objectives is compromised and is preventing the project from progressing forward.
  - Significant schedule issues exist (> 60 days late). Milestone and task completion dates will need to be re-planned.
  - Executive management and/or project sponsorship attention is required to bring the project under control.

# Appendix A (cont'd.)

## 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 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: Inputs

*This appendix identifies the artifacts and activities that serve as the basis for the IV&V observations.*

## **Meetings attended during the reporting period:**

1. BHA ITS Weekly Status Meeting (selected)
2. Weekly Data Migration Meeting (selected)
3. Daily Scrum meetings (selected)
4. Weekly Meeting to address targeted questions (selected)
5. Weekly BHA IT Schedule Meeting (selected)
6. Weekly IV&V Deliverable Reviews meeting
7. Weekly Standing IV&V Report Review meeting
8. Monthly BHA IV&V PCG-RSM Report Review meeting
9. (Continued) Weekly Post Iteration 5 / Deployment planning meeting (9/18/18)
10. BHA IT Solution DDD Iteration 4 Demo (9/11/18)
11. DOH BHA - CAMHD Case Management Solution Demo - Iteration 4 (9/12/18)
12. DOH BHA IT Solution Project - Steering Committee (9/13/18)

## **Artifacts reviewed during the reporting period:**

1. Iteration 4 DED
2. Iterations 4 and 4 Plan
3. Iterations 5 Test Plan
4. Iteration 4 TFS Backlog Report
5. Iteration 4 Defect Log
6. Iteration 4 Unit Test Results
7. Iteration 4 Review
8. Daily Scrum Notes (selected)
9. Data Management Meeting Notes (selected)
10. SI Project Schedule (ongoing)
11. RSM Weekly Status Reports (ongoing)
12. Iteration 0 – Data Management Plan v2.1
13. Iteration 0 – Architecture Blueprint v3.0

## **Eclipse IV&V® Base Standards and Checklists**



**Eclipse IV&V  
Standards**

# Appendix C

## Trend Data

Trend: Overall Project Health																
Process Area	2018												2019			
	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr
<b>Overall Project Health</b>				G	Y	G	Y	Y	Y	Y						
Project Management	Y	Y	G	G	Y	G	Y	Y	Y	Y						
Requirements Management	Y	G	G	G	Y	G	G	G	G	Y						
Design and Development	Y	Y	G	G	Y	Y	Y	Y	G	G						
Testing					G	G	Y	Y	Y	G						
Data Management					G	G	Y	Y	Y	Y						
Organization Change Management	Y	Y	Y	Y	Y	Y	Y	R	Y	Y						
<b>Total Open Findings</b>	<b>18</b>	<b>17</b>	<b>19</b>	<b>17</b>	<b>17</b>	<b>15</b>	<b>17</b>	<b>12</b>	<b>9</b>	<b>9</b>						
Issue - high							1			1						
Issue - medium				1	1	2	4	5	4	1						
Issue - low								1	1	3						
Risk - high								1								
Risk - medium	10	4	5	9	3	1	3	1	3	4						
Risk - low	6	10	10	3	10	11	9	4	1							
Observations - high																
Observations - medium	2	1	1	2	1	1										
Observations - low		2	3	2	2											



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BHA Findings 2018 October Report

	Identified Date	Summary	Observation	Significance	Recommendation	Updates	Process Area	Type	Priority	Status
7	09/01/17	<b>Attention to User Adoption (buy-in)</b>	SI seems to lack a comprehensive strategy to support user adoption.	Failure to implement an effective user adoption strategy could lead to resistance during system rollout, refusal to participate in the development/rollout process, resistance to use the system, and negative public perceptions (including the media). In the end, this could lead to a reduction of ongoing project funding, a weakened SI reputation, as well as long-term public scrutiny and criticism.	Recognizing that the SI has committed to a training (sandbox) environment for SME validations of functionality and to provide the opportunity for user involvement, IV&V would suggest that other measures should be taken as well. For example, although the State has initiated the practice of tracking pain points, the process for how the SI will utilize this list has not been clearly identified and monitored. Tracking pain points can be an effective OCM strategy for user adoption and buy-in as it provides visibility to the users of problems the system is actually solving and provides traceability of pain points to system features during sprint demos. IV&V also recommends BHA request the SI adopt a general user adoption strategy going forward. IVV will continue to monitor to validate that the BHA's expectations are met.	<p>10/31/18: The project released a draft OCM Plan in September which provides a high-level strategy to support user adoption. The OCM Plan outlines the approach that will be taken by the state to support end user adoption of the new case management system but lacks the details regarding specific roles and responsibilities, timeline information, metrics for measuring and assessing the transition, communication and escalation procedures, and the processes to be employed to facilitate adoption. IV&amp;V has increased the priority of this finding to High since these details are not yet fully defined whilst the project is heavily engaged in executing Implementation Phase activities and already executing OCM-related tasks (e.g., Train-the-Trainer).</p> <p>9/30/18: The team conducted targeted planning session throughout the reporting period and focused on planning the activities required for the Implementation Phase. As a result, many OCM-related decisions have been made related to the approaches, scope, and timing for training, transition activities, and communications for both internal and external (Provider) stakeholder groups. Completion of the OCM plan is pending updates which reflect recent planning decision. Many OCM best practices, such as conducting system overview sessions prior to UAT as well as identifying and including System Champions (or Super Users) in the UAT activities, have been incorporated into the approach. Due to the planning progress and forward thinking mitigation to ensure user adoption, IV&amp;V is lowering the severity of this risk.</p> <p>8/31/18: The OCM Plan is not yet been finalized and early planning for the Implementation Phase indicates a large volume of pending decisions surrounding training and cutover, both of which</p>	Organizational Change Management	Risk	Medium	Open
19	09/01/17	<b>Federal funding risk</b> (Lead Entity: State)	Ability to access enhanced federal funding as initially planned is at risk due to State Medicaid Agency delays in completing its MITA State Self-Assessment (SS-A) prior to the submittal of DOH's IAPD.	Delays in securing enhanced funding has delayed system development. Inability to claim federal funds could negatively impact the project budget, scope and schedule.	Recommend BHA continue to work closely with DHS to pursue available funding options. IV&V will continue to monitor progress.	<p>10/31/2018: The project awaits feedback from CMS regarding the IAPD. Meanwhile, revisions to the MOA related to cost allocations are underway in anticipation of CMS request.</p> <p>9/13/18: BHA and PCG met with MQD on 8/30/18, the draft was revised and resubmitted to MQD on 9/7/18 without the MOA attached. The risk associated with the federal funding will transition from IAPD development to the length of time it will take to get CMS approval, once the IAPD is submitted. MedQuest reported that MOA is in progress at the monthly DOH BHA Steering Committee meeting.</p> <p>8/8/18: DOH submitted the IAPD to DHS for internal and has received minimal comments by the</p>	Project Management	Issue	Medium	Open
31	#####	<b>Errors in the data migration files may impact the overall implementation schedule</b>	Files or data unable to be processed as part of the planned data migration may jeopardize the project's schedule.	If the data migration files or data is not formatted correctly, they will not convert. Errors in converted data may delay the implementation if additional time is required to resolve them.	Determine alternative methods for piloting, analyzing, and/or remediating data migration activities and outputs prior to or during the cutover period.	<p>10/31/18: DOH has made significant progress in loading the minimum set of data but the project still continues to address data migration anomalies in preparation for deployment. Though there is regular, steady progress, the extended efforts of the project in this area raise concern regarding the project's ability to resolve data migration issues during the cutover window when there is considerably less time available to the team before go live.</p> <p>9/30/18: The project continues to address issues associated with the data migration files and has identified new complexity, and thus additional risk, with future data migration iterations scheduled during the cutover period. The time available to remediate data "catch up" migration issues may not be sufficient.</p>	Data Management	Risk	Medium	Open

BHA Findings 2018 October Report

Identified Date	Summary	Observation	Significance	Recommendation	Updates	Process Area	Type	Priority	Status
33	##### <b>Executing project activities before planning is complete and approved</b> [Lead Entity: Vendor]	Project resources have worked on tasks in hopes of making progress even though the plan and/or approach for doing the work has not yet been approved. Until or after project plans are approved, completed project tasks are subject to rework.	When project resources execute work before planning activities have completed and documented approaches, plans, and procedures are approved, they run the risk of not completing the work appropriately. Then, either later in the project's life cycle the work must be redone or the project must determine if the work is 'good enough' to proceed. The former scenario causes strain on resources and the project's schedule and the latter scenario results in reduced quality in the project's outputs. An example is the data migration files. A documented plan may have assuaged the formatting errors now facing the project. Other examples include: requirements management and defining acceptance criteria.	Focus on completing the Planning activities and obtain agreement on the plan, approach, and/or procedures for these upcoming phases (at a minimum): User Acceptance Testing, Data Migration, Training, Cutover and Implementation, OCM, and Post-Implementation. BHA to initiate Transition Planning activities to identify DOH's support requirements and develop a plan for securing and training help desk staff prior to go live	10/31/2018: The project is executing OCM activities in the absence of detailed planning. For example, 'project champions' are now engaged in UAT and Training activities but their full roles and responsibilities are not yet fully defined.  9/28/18: The planning for the Implementation Phase activities nears completion and a detailed deployment schedule has been developed. Though there are project plans that are still under development, IV&V has reduced the rating of this issue to Low since there are few remaining planning related items that need to be addressed.  8/31/18: IV&V observed continued efforts to complete planning activities whilst executing project activities. For example during the reporting period, DOH requested changes (swaps) to user stories already planned for Iteration 4 in order to prioritize and ensure delivery of functions in Phase 1 identified by DOH stakeholders in the latest demonstration. Changing the scope of Iteration 4 while it was in progress increased the risk of potential development rework. Also, new data migration files were identified during the period and have been added to the project's scope though the Data	Project Management	Issue	Low	Open
34	##### <b>Unassigned BHA Lead resources may slow project progress</b> [Lead Entity: State]	The project is progressing into the Implementation Phase which includes Training, Testing, and Cutover and typically requires heavy state staff participation. Currently, the BHA team does not have state Leads assigned to manage and guide the successful and timely completion state-owned project tasks in these areas.	Training, Testing and Cutover project activities require a specialized focus during the Implementation Phase to ensure these activities are completed appropriately and are compliant with requirements and high quality standards. When existing project resources take on these late-coming project responsibilities, on top of their existing workload, there is increased risk that insufficient attention will be given to drive these activities to completion. Further, there is additional benefit to assigned SMEs with expertise in these areas to perform Lead responsibilities as their insight and experience can help mitigate risk and foster the implementation of best practices.	Perform analysis on the state-owned tasks for Training, Testing, and Cutover project activities in order to define a role and distinct set of responsibilities for Lead SMEs for each. BHA to identify and assign LEAD SME resources to champion these respective project activities during the Implementation Phase.	10/31/2018: Since this risk was initially opened, CAMHD has assigned two additional full-time resources and continues to recruit two more - and DDD has added one full-time resource. The BHA resource requirement to satisfy all activities outlined in the deployment schedule and OCM Plan have not yet been confirmed and current BHA Leads are multi-tasking to accomplish non-strategic activities (e.g., log users on/off the training environment).  9/13/18: BHA has identified new resources to perform training and testing activities during the Implementation Phase. However, the BHA resource requirement to satisfy all activities outlined in the newly developed deployment schedule has not yet been confirmed (e.g., data migration catch up activities).  8/31/18: The Implementation Phase, which includes Testing, OCM, and Cutover activities, typically requires heavy state staff participation. Currently, the BHA team does not have dedicated state Leads assigned to manage and guide the successful and timely completion of state-owned project tasks in these areas. IV&V has increased the rating to Medium since it has been observed that current assigned Leads are significantly over-allocated and challenged with juggling their current	Project Management	Risk	Medium	Open