

### OFFICE OF ENTERPRISE TECHNOLOGY SERVICES

P.O. BOX 119, HONOLULU, HAWAI'I 96810-0119 Ph: (808) 586-6000 | Fax: (808) 586-1922 FTS HAWAII GOV

April 15, 2024

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

Aloha Senate President Kouchi, Speaker 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 (IV&V) reports to the Legislature within ten days of receiving the report, please find attached the report the Office of Enterprise Technology Services received for the State of Hawai'i, Department of Human Services, Systems Modernization Project.

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

Sincerely,

Douglas Murdock (Apr 15, 2024 11:17 HST)

Douglas Murdock Chief Information Officer State of Hawai'i

Attachments (2)



# Hawaii Department of Human Services Systems Modernization Project

Final IV&V Status Report for Reporting Period: March 1 – 31, 2024

Submitted: April 12, 2024



### Overview

- Executive Summary
- IV&V Findings and Recommendations
- IV&V Engagement Status
- Appendices
  - A IV&V Criticality Ratings
  - B Risk Identification Report
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# **Executive Summary**

### **Executive Summary**



The ASI delivered an updated BES Project Schedule that aligns with the approach to the BES Implementation modified in the Go to Green plan, resulting in a 2-month implementation delay for statewide Go-Live and a 6-month delay for functionality included in the Post-Statewide Go-Live. The level of risk to the BES Project was evaluated in this month's report based on the availability of data to IV&V regarding these key changes:

- The BES project schedule continues to be aggressive with minimal slack (extra) time to absorb unexpected delays without
  impacting the Go-Live dates. The ASI added one week of slack between Final Acceptance Testing and Pilot and another
  week of slack between Pilot and Statewide Go-Live.
- The proposed three-phased implementation approach adds complexity to the Project and requires additional project and technical management engagement and coordination. Concurrent development and testing phases create a risk to DHS in the form of rework (e.g., testing functionality as new code is added, retesting to ensure the new code does not negatively impact existing functionality, and managing defects across multiple testing phases).
- Executing the project schedule is straining project resources and the management of the phases adds to the effort.

The DHS and ASI project teams are committed to this Project and intend to deliver a quality product without creating further delays or shifting additional functionality post-pilot to meet the go-live targets.

Jan	Feb	Mar	Category	IV&V Observations
Н	H	<b>=</b>	Project Management	This category continues to be red due to overlapping development and testing phases and IV&V's lack of insight into the ASI methodology used to support revised estimates for completing the remaining work. The ASI intends to provide its methodology to IV&V in the next reporting period.

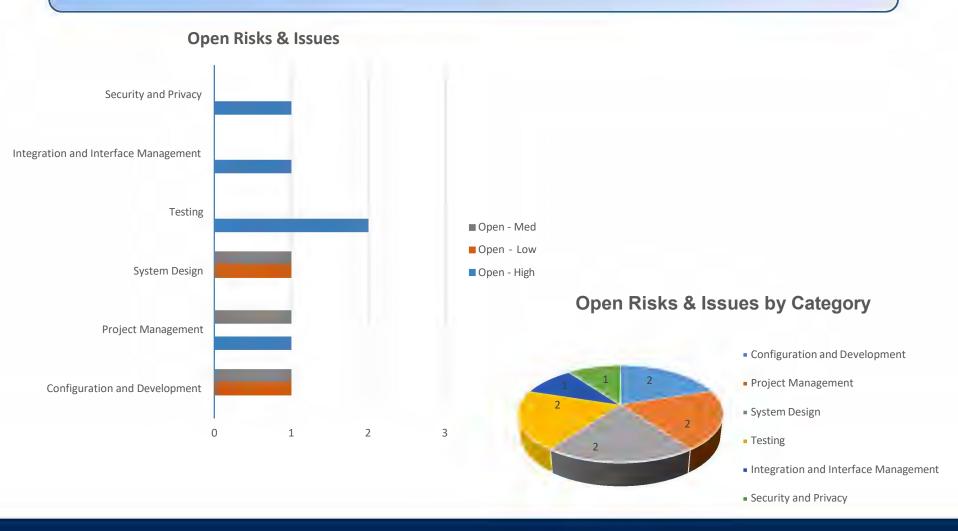
# **Executive Summary**



Jan	Feb	Mar	Category	IV&V Observations	
( <u>M</u> )	M	M	System Design	DHS design feedback for Epic demo 261 (Approvals and Supervision) will require another demo to validate the changes made by the ASI. If this becomes a trend with other Epics, delays to Pilot and other milestones may occur.	
M	Configuration and pevelopment As part of the ASI's Go to Green plan, they plan on implementing revised processes improve code quality. IV&V will evaluate once we receive factual data from the ASI reporting the results of these changes.				
H	H	Integration and Interface Management IV&V is reviewing the draft Interface testing plan, we will evaluate the criticality of this category after our review is complete.			
H	H	<b>H</b>	Testing	The Project entered into System Integration Testing (SIT) without approved test scripts for some Epics that will be phased into SIT after testing begins. IV&V is concerned that phased-in functionality may require retesting and could extend the testing duration.	
H	H	Н	Security and Privacy	The necessity to complete the 3rd Party Security Assessment before Pilot places significant pressure on DHS and the ASI to complete, test, and implement all required security documents, processes, and procedures This will remain a high-criticality category until the required security documentation is complete.	

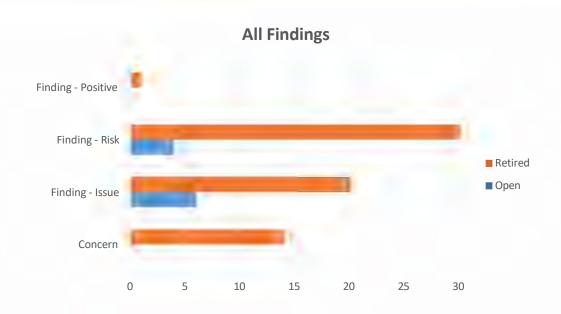


As of the March 2024 reporting period, PCG is tracking 10 open findings (4 risks, 6 issues) and has retired a total of 73 findings. Of the 10 open findings, 5 are High, 3 are Medium, and 2 are Low.





The following figure provides a breakdown of the 84 IV&V findings (positive, risks, issues, concerns) by status (open, retired).





### Findings Retired During the Reporting Period



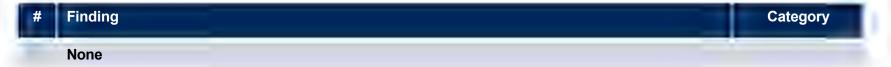


Preliminary Concerns Investigated During the Reporting Period





Findings Opened During the Reporting Period





### **Project Management**

#	Key Findings	Criticality Rating
	Issue – A BES Project schedule based on inaccurate estimations diminishes effective planning and resource management, which could result in late deliverables, cost increases, and a late go-live.	
74	The BES Project Schedule that aligns with the Go to Green plan was published by the ASI during this reporting period. The overlap of Integration Testing (INT) and SIT, and adding functionality into SIT after it has started may lead to more delays as seen in prior schedules.	Н

Recommendations	Progress
<ul> <li>Monitor, evaluate and revise scheduling estimates for accuracy based on the project teams past performance and resources available to do the remaining work.</li> </ul>	In Process
ASI provide details on how Velocity measures were used to calculate the remaining development work.	Incomplete
<ul> <li>ASI conduct a Root Cause Analysis (RCA) with DHS and IV&amp;V to determine why the BES Project continues to experience schedule delays.</li> </ul>	Not Started
<ul> <li>ASI Project Management works with the development teams to evaluate the accuracy of Velocity and adjust accordingly to reduce risk in the revised BES project schedule.</li> </ul>	Not Started



### **Project Management**

#	Key Findings	Criticality Rating
	Risk – Implementing a Core Solution for go-live carries inherent risks that may impact overall Project success and reduce user adoption.	
88	The ASI's Go to Green plan and project schedule were approved by DHS. Per the Go to Green plan, some required BES functionality will be implemented post-Pilot. This may create unplanned workarounds and rework as the full impact of this approach becomes known through testing and training.	М

Recommendations	Progress
<ul> <li>Increase OCM efforts to effectively manage user, general public, and legislative expectations for BES version at go-live.</li> </ul>	In process
<ul> <li>Prioritize feedback from users and FNS to ensure the solution meets their core needs and so users are clear on what features they are, and are not, getting.</li> </ul>	In process
<ul> <li>Actively monitor, assess, and address potential challenges throughout the development process including code quality, cutting scope to meet development milestones, insufficient user validation of demonstrated functionality, and fully defined workarounds to accommodate for the missing functionality.</li> </ul>	In process
<ul> <li>DHS carefully assesses whether the advantages of a timely release outweigh the advantages of going live with a system that provides more comprehensive functionality, requires fewer workarounds, and increases user satisfaction.</li> </ul>	In process



### Integration and Interface Management

#	Key Findings	Criticality Rating
63	Issue – The lack of early planning and coordination with interface partners may result in schedule delays.  DHS and IV&V are currently reviewing the draft Interface Test Plan published by the ASI this month; we will provide an update on this issue in the next report.	<b>H</b>

Recommendations	Progress
Confirm testing dates with interface partners in writing.	In process
<ul> <li>Complete early proof of concept interfaces to avoid unexpected delays miscommunications or their own internal delays in assisting the BES P</li> </ul>	



### **Configuration and Development**

#	Key Findings	Criticality Rating
	Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution.	
70	Responsibility for the Configuration Management Plan (CMP) reverted to the ASI (previously, the DHS Security Contractor was updating the CMP for related security controls). The ASI is resuming this scope of work at a time when its resources are stretched and may lead to CMP and configuration management quality challenges.	•

Recommendations	Progress
<ul> <li>ASI adhere to plans for configuration management as documented in BI-6 DDI Plan, Section 5.2 and clarify details and/or any changes with DHS.</li> </ul>	In process
<ul> <li>ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track.</li> </ul>	In process
DHS and ASI work to clarify/solidify plans for the potential use of configuration management tools and DHS work to fund and procure a CM tool, as required, to avoid any negative impacts to the Project.	In process



### Configuration and Development

#	Key Findings	Criticality Rating
	Issue – Development delays could negatively impact the project schedule and delay go-live.	
	To address this issue, the ASI reported they built the revised BES Project Schedule with some slack/float time.	
80	IV&V is researching Data Conversion and the impact, if any, it had on the most recent Schedule delay. The conversion team has some remaining data elements to map. They reported that the full scope of 'data cleansing' may not be complete before converting the data. IV&V is continuing to research and plans to provide an update in a future report.	M

Recommendations	Progress
<ul> <li>ASI effectively track and regularly provide DHS (potentially via the weekly DDI status meeting) with an accurate velocity (e.g., story points per day/week/month) and assure that the current velocity is accurately and consistently reflected in the project schedule.</li> </ul>	In process
The ASI should provide DHS with the time needed to effectively evaluate the software demonstrations (demos) and elicit productive design discussions with DHS attendees during each demo.	In process
<ul> <li>ASI regularly reports estimated story points for the total remaining project work to reach go-live and presents a dynamic burn-down chart to track the progress.</li> </ul>	Not started



### System Design

#	Key Findings	Criticality Rating
ħ	Risk – The planned BES infrastructure is complex which could be difficult to implement and maintain and could lead to schedule/cost impacts.	
73	During a recent Change Control Board (CCB) meeting the ASI presented DHS with a for-cost change request (CR) to the design of the Secure Enclave (the addition of roles). In the CCB, it was clear that DHS and the ASI were not in agreement regarding the funding of this change request.	

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



### System Design

#	Key Findings	Criticality Rating			
	Issue – Limited collaboration between the ASI and DHS in the design process could lead to BES usability issues and functionality gaps in the application and not meeting critical business needs for DHS and State clients.				
86	Due to a high number of questions and concerns from DHS during Epic demo 261 (Approvals and Supervision), the ASI committed to hosting another demo to address all the feedback. Changes raised late in the design process could require code changes, potentially causing schedule delays or the resulting solution not meeting the business need. DHS staff attending Epic demos should be prepared with an understanding of the agreed-upon designs and policy requirements relevant to the Epic so that feedback is efficient and on point.				
Po	commendations	Progress			
		Progress			
	Include a wide enough audience in all design and demo sessions to validate FNS and DHS functional and technical requirements and system usability.	In Process			
	Perform Sprint and Epic demos in alignment with development Sprint completion (demo functionality/requirements as they are developed) to get early feedback on work products.	Not Started			
	Perform comprehensive (demo all requirements) review during Epic demos, not just the items that were added/updated, allowing DHS to provide early feedback on possible issues/gaps that might not be apparent when focusing on specific functionality.	In Process			



### **Testing**

#	Key Findings	Criticality Rating
	Issue – Gaps in test coverage and slower-than-expected progress in testing may result in schedule delays if subsequent test phases uncover a higher volume of defects and user feedback than initially anticipated.	
83	DHS and the ASI entered into BES 1.0 SIT on 3/15/2024 without approved test scripts for several Epics that will be phased into SIT after testing begins. The phased introduction of test scripts can negatively impact testing and reduce the time available to identify and fix defects within scheduled timeframes. IV&V review of test scripts shows that quality could be improved by adding additional details or steps to the test scripts to verify test coverage.	(H)

Recommendations	
Monitor INT/SIT closely for both breadth and depth of testing to ensure the system is adequately tested.	In process
• The project team reviews the SIT Entry and Exit criteria and revises them as needed to ensure UAT/FAT begins with the best system possible.	Not Complete
<ul> <li>ASI should determine the root cause of the failure to identify simple defects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT</li> </ul>	In process



### **Testing**

#	Key Findings	Criticality Rating
	Issue – The current mitigation approach to complete the development of the remaining R0.12 Epics is condensed and aggressive and may increase the likelihood of schedule delays, quality issues, and a higher volume of testing defects.	
89	On 3/15/2024, DHS and the ASI agreed to enter SIT for BES 1.0 without meeting the criteria for a complete test script package documented in BI-19 Complete and Final Test Plan. IV&V is concerned that starting SIT without the complete and approved SIT Test Script package may lead to schedule delays.	•
	The updated schedule reflects an overlap of BES 1.0 INT and SIT efforts which could result in resource constraints. Testing also overlaps across releases (BES 1.0 and BES 1.1) which adds complexity and risk when maintaining and coordinating code across multiple test environments.	

Recommendations		
Develop Contingency Plans if the mitigation plan continues to see slippage affecting INT and SIT.	In process	
<ul> <li>The ASI provides comprehensive INT results and SIT scenarios for incomplete Epics to DHS for review/approval ahead of SIT execution.</li> </ul>	In process	
• The ASI release a detailed schedule of events, including development completion, INT start, SIT start for each epic covered in the mitigation plan.	In process	
<ul> <li>The ASI should evaluate if Epics entering SIT late might require retesting functionality that had already been tested</li> </ul>	In process	



### Security and Privacy

#	Key Findings	Criticality Rating
	Risk – The lack of technical documentation may lead to incorrect implementation statements or delay the System Security Plan (SSP).	
82	During March, the DHS/ASI security teams focused on documentation and the Tenable Nessus scans on the base BES Production environment (without the Secure Enclave). The Secure Enclave is not included in the BES 1.0 Core Release and will not be part of Pilot. Therefore, the upcoming 3 <sup>rd</sup> party security assessment will not include the Secure Enclave.	
	Security documents (e.g., data flow, network diagrams, Plan of Actions and Milestones (POAMs), and procedural documents such as Change Management procedures) may not be complete for the 3 <sup>rd</sup> party assessment starting in April, which may result in potential findings and POAMs for remediation if not available.	
	Additionally, DHS reported that several DHS Security and Privacy policies were not updated in the past 365 days as required by NIST 800-53.	

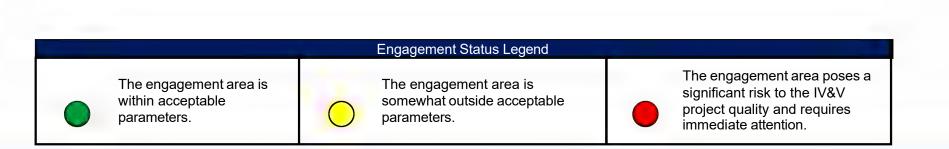
Recommendations		
Determine when the infrastructure design baseline will be completed.	In process	
Determine when documentation will be created, updated, and available for the SSP authors.	In process	
<ul> <li>Collaborate and communicate with SSP authors about when reliable and correct documentation will be available.</li> </ul>	In process	
<ul> <li>Perform a full review of all SSP controls for content and accuracy that have been written as drafts prior to the start of the Independent Security Controls Assessment of BES and submission of the SSP package to federal regulators. This will allow the SSP authors to update controls with changes from Design through Implementation.</li> </ul>	In process	



## IV&V Engagement Status



IV&V Engagement Area	Jan	Feb	Mar	Comments
IV&V Budget				
IV&V Schedule				DHS and PCG are discussing the extension of the IV&V contract that currently ends in April 2024.
IV&V Deliverables				PCG submitted the final February IV&V Monthly Status Report.
IV&V Staffing				
IV&V Scope				



### **IV&V** Activities



- IV&V activities in the March reporting period:
  - Completed February Monthly Status Report
  - Ongoing Review the BES Project Artifacts and Deliverables
  - Ongoing Attend BES Project meetings, (see <u>Additional Inputs</u> pages for details)
  - Reviewed available ASI contracts and contract amendments documentation
- Planned IV&V activities for the April reporting period:
  - Ongoing Observe BES Design and Development sessions as scheduled
  - Ongoing Observe Bi-Weekly Project Status meetings
  - Ongoing Observe Weekly Architecture meetings
  - Ongoing Observe Weekly Security meetings
  - Ongoing Monthly IV&V findings meetings with the ASI
  - Ongoing Monthly IV&V Draft Report Review with DHS, ETS and ASI
  - Ongoing Participate in Bi-Weekly DHS and IV&V Touch Base meetings
  - Ongoing Review BES artifacts and deliverables





Deliverable Name	Deliverable Date	Version
BI-5 Project Schedule - BES 2023 Primary	03/13/2024, 03/20/2024, 03/27/2024	N/A
BI-5 Project Schedule - BES 2023 DDI	03/13/2024, 03/20/2024, 03/27/2024	N/A
Interface Test Plan	3/20/2024	N/A
M & O Project Schedule	3/25/2024	N/A

# Additional Inputs – Artifacts



Artifact Name	Artifact Date	Version
BES 2023 Design Kanban board	N/A	N/A
FNS Handbook 901	01/2020	V2.4
NIST Special Publication 800-53 Security and Privacy Controls for Information Systems and Organizations	12/20/2020	Rev.5
SNAP_System_Integrity_Review_Tool	Sept 2022	N/A
Interface Dashboard – Confluence page	N/A	N/A
BES 2023 Implementation Planning – Confluence page	N/A	N/A
R0.12 Epic Assignment	N/A	N/A
UAT Testing Dashboard	N/A	N/A
RO.12 Epic and Sprint Demo Recordings	N/A	N/A
ADA dashboard	N/A	N/A
Jira Requirements Details	N/A	N/A
Jira Testing Lists	N/A	N/A

### **Additional Inputs**



### Meetings and/or Sessions Attended/Observed:

- 1. IV&V Team Meeting 3/1/2024, 3/7/2024, 3/11/2024, 3/14/2024, 3/18/2024, 3/21/2024, 3/25/2024, 3/28/2024
- 2. IV&V February 2024 Pre-Draft MSR Findings Review 3/7/2024
- 3. HI DHS BES January Draft IV&V Report Review 3/13/2024
- 4. Bi-Weekly DHS and IV&V Touch Base 3/5/2024, 3/19/2024
- 5. Weekly BES Infrastructure meeting 3/1/2024, 3/8/2024, 3/15/2024, 3/22/2024
- 6. DHS/IV&V Check-in 3/14/2024, 3/28/2024
- 7. Weekly Client BES 2023 Project Status Meeting 3/13/2024, 3/20/2024, 3/27/2024
- 8. Security Touchpoint 3/6/2024, 3/13/2024, 3/20/2024, 3/27/2024
- 9. Weekly Data Conversion Workgroup 3/7/2024, 3/14/2024, 3/21/2024
- 10. (External Epic demo) Epic 261 Approvals and Supervision / Epic 241 Eligibility.. 3/1/2024
- 11. (External) Weekly Interfaces Touchpoint 3/4/2024, 3/11/2024, 3/18/2024, 3/25/2024
- 12. (External) Readiness Working Group Meeting 3/5/2024, 3/12/2024, 3/19/2024
- 13. (External) Bi-Weekly Client BES 2023 Schedule Review/Status 3/27/2024
- 14. (External) Bi-weekly BES CCB Meeting 3/6/2024, 3/20/2024
- 15. (External) BES: FNS Connect 3/14/2024
- 16. (External-Epic Demo) Epic 284 Process Case Changes, Renewals, and SMRFs-3/1/2024
- 17. (External) C!A Current Weekly Checkpoint 3/5/2024, 3/12/2024, 3/19/2024
- 18. (External-Epic Demo) Epic 239 Payment Processing—3/8/2024
- 19. (External) BES M&O Migration Kickoff Meeting- 3/11/2024
- 20. (External Pre-design) TANF Data Extract Epic 286-3/6/2024, 3/13/2024,
- 21. (External) BES 1.0 SIT Go/No-Go Meeting 3/15/2024
- 22. (External Epic Demo) Epic 257 Interview and Application and Epic 241 Eligibility Determination 3/15/2024
- 23. (External) BES BI-05 Project Schedules Responses Review Meeting cont'd 3/18/2024
- 24. (External) BES M&O Project Status Meeting 3/18/2024, 3/25/2024
- 25. (External Epic Demo) Epic 230 Repatriate, Refugee, and Asylee/ Special Circumstance Allowances / D-SNAP/Manual Benefits 3/28/2024
- 26. (External Epic demo) Epic 238 Claim Setup and Maintenance 3/28/2024
- 27. (External-Epic Demo) Epic 249 Automated Case Monitoring 3/28/2024





# Appendix A – IV&V Criticality Ratings

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

## Appendix B – Findings Log



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

### Appendix C – Acronyms and Glossary



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



## Appendix C – Acronyms and Glossary

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





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

### Appendix D – Background Information



### **Systems Modernization Project**

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

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

### **Systems Modernization IV&V Project**

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

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

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

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

### Appendix D – Background Information



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

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

### PCG's Eclipse IV&V® Technical Assessment Methodology

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

### **IV&V** Assessment Categories for the BES Project

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

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



**Solutions that Motter** 

									Manda
current approach to complete Hi	lackett, Finding -	12/21/2023 Testing	Ten of the Epics scheduled for completion before Release 0.12 SIT will not  Overlapping development and testing introduces potential quality issues.	Develop Contingency Plans if the mitigation plan continues to see slippage Now	4 5 Hig	o Open	3/31/2024 - On 3/15/2024, DHS and the ASI agreed to enter SIT for BES 10	ant Communics	Vendo
elopment of the remaining epics is Do	Donna Issue		be ready. To avoid SIT delays, the current approach is to begin SIT without Insufficient INT may create gaps in SIT, leading to further quality issues. This	affecting INT and SIT The ASI provides comprehensive INT results and SIT			without meeting the criteria for a complete test script package documented		04/10
densed and aggressive and may increase likelihood of schedule delays, quality			the 10 Epics and test them as they are completed. Additionally, Release 0.12 may increase the risk of significant delays or introduce defects into the	scenarios for incomplete Epics to DHS for review/approval ahead of SIT			in BI-19 Complete and Final Test Plan. IVV is concerned that starting SIT		eWor
iss, and higher volume of testing defects.			development that was extended two weeks from the scheduled end date has production environment.  been extended for another ten business days.	execution The ASI release a detailed schedule of events, including development completion, INT start, and SIT start for each epic covered in the			without the complete and approved SIT Test Script package may lead to schedule delays. The updated schedule reflects an overlap of BES 1.0 INT		entry
,				mitigation plan The ASI should evaluate if Epics entering SIT late might require retesting functionality that had already been tested The plan to			and SIT efforts which could result in resource constraints. Testing also		docum
				require retesting functionality that had already been tested The plan to			overlaps across releases (BES 1.0 and BES 1.1) which adds complexity and		19 for
				complete BES implementation does not include overlapping testing phases			risk when maintaining and coordinating code across multiple test		were r
							environments. 2/22/2024 - During the February 21, 2024, Weekly Project Status Meeting and February 28, 2024, BES Schedule Review Meeting, the		to the
							ASI introduced and detailed the draft Go-to-Green plan. However, edits to		decisio
							the plan continue and final DHS approval is outstanding. The draft Go-to-		was m
							Green plan indicates an ongoing overlap of development and testing		the Cli
							activities as functionality will be phased into pilot and statewide rollout. System Development Best Practices recommend no testing phases be		Corre
							System Development Best Practices recommend no testing phases be overlapped because of the amount of rework and instability this causes to		revie
							the project team and solution. 1/31/2024 -To mitigate the INT and SIT		appro
							overlap and incomplete SIT test scripts, the ASI moved the start of SIT to		
							February 2nd, with "Informal" SIT continuing in January. Despite this		
							attempt, continued development delays and code quality issues led to adding 2 integration testing sprints, further extending integration testing.		
							Additionally, on January 31, 2024, the ASI announced the delay of the		
							February 2nd SIT entry date and stated that a new mitigation approach to		
							meet the August Go-Live date was under development. IV&V has updated		
							this finding to an "Issue" and the Criticality Rating to 'High'.		
	ors, Michael Finding -	11/30/2023 Project	The project has elected to implement a Core Solution at go-live to meet their Going live with a limited version of a software product entails inherent risks		3 3 Me	d Open	03/30/24 - The ASI's Go to Green plan and project schedule were approved		
inherent risks that may impact	Risk	Management	stated timeline. This version is generally referred to in Agile software such as potential challenges in securing user buy-in. This can result in	legislative expectations for the Core Solution approach. • Prioritize feedback			by DHS. Per the Go to Green plan, some required BES functionality will be		
project success and reduce user n.			development as: a Minimum Viable Product (MVP), which is a simplified limited user adoption, user dissatisfaction, and negative publicity, version of a product that 1) offers functionality that meets the core needs of particularly considering the financial investment made for the delivery of	from users and FNS to ensure the Core Solution meets their core needs and so users are clear on what features they are, and are not, getting in the			implemented post-Pilot. This may create unplanned workarounds and rework as the full impact of this approach becomes known through testing		0
			version of a product that 1) offers functionality that meets the core needs of particularly considering the financial investment made for the delivery of users, 2) can accelerate the timeline for go-live, and 3) allows the project to limited functionality. A compressed timeline may compromise the quality of				rework as the full impact of this approach becomes known through testing and training. 02/29/24 - The ASI drafted a Go-to-Green plan that includes		2
			get real-world feedback from users to refine future product development. designs, user interface sophistication, and lead to an uptick in software bug:	challenges throughout the core solution development process including			an October 2024 Go-Live date, with several features to be released after		fe
			and suboptimal code. Further, this approach may expose the project to	code quality, cutting scope to meet development milestones, insufficient			Pilot. Implementing the functionality of a core solution not tested in a real-		in
			regulatory compliance risks, such as last-minute objections from regulator	y user validation of demonstrated functionality, and fully defined			world Pilot environment may lead to unexpected issues and bugs. IW		F
			bodies like FNS, which could find certain system elements non-compiliant with their standards and delay the go-live date. Misalignment between	workarounds to accommodate for the missing functionality. • DHS carefully assess whether the advantages of a timely release outwelch the advantages			remains concerned that user expectations will not be fully met as the go-live		m
				assess whether the advantages of a timely release outweigh the advantages of going live with a system that provides more comprehensive functionality.			system will be missing functionality that could be important to many users.  01/23/23 - The ASI recently transitioned the OCM leadership role to a new		th
			staxenoider expectations and the Lore solution may lead to dissatisfaction or a lack of support for the project and could negatively impact future	requires fewer workarounds, and increases user satisfaction and buy-in. •			resource. OCM activities will be crucial in reducing the risk associated with		u
			project funding requests. Implementing a limited Core Solution typically	Actively monitor tester and pilot feedback and track users biggest pain			implementing the Core Solution and effectively managing user, public, and		-
			requires the customer to implement multiple workarounds until automate	od points. Pain points can then be prioritized based on negative impact and			legislative expectations. The ASI has stated they do not expect this transition		pl
			features can be built into the system. Users could become impatient if the	ese project leadership can decide if fixing or changing poor designs can be			to negatively impact the project and have noted some potential		im
			features are further delayed when bug fixes and other features take precedence. Others may lose confidence that the features or system	implemented prior to go-live.			improvements. 12/31/23 - Delays in some planned activities (e.g., epic demos, interface designs) and the development of the secure enclave are		fu m
			precedence. Our properties of the properties of				causing milestones to be missed. IVV remains concerned about potential		(Pi
			missing functionality that stakeholders were expecting typically requires a	1			quality impacts due to the need to accelerate efforts to compensate for		Sta
			increase in OCM efforts both by the ASI and DHS staff to temper				missed milestones. Delays in some planned activities (e.g., epic demos,		23
			stakeholders' reactions to a system with limited functionality.				interface designs) and the development of the secure enclave is causing		ac
							milestones to be missed. IVV remains concerned about potential quality impacts due to the need to accelerate efforts to compensate for missed		Ca
							impacts due to the need to accelerate efforts to compensate for missed milestines		red
									"le
d collaboration between the ASI and Mo	folina, Brad Finding -	8/1/2023 System Design	During the UAT process for release 11, there has been a high level of  A significant amount of money and DHS resource time have been investee	in OPEN - Include a wide enough audience in all design and demo sessions to Now	4 3 Me	d Open	03/31/2024 - Due to a high number of questions and concerns from DHS 10/11	/11/2023 Jessica - Our SMEs are providing their feedback. This is one o	*10
ed collaboration between the ASI and Months design process could lead to BES	tolina, Brad Finding - Issue	8/1/2023 System Design	concerns raised by the DHS testers regarding the usability of the BES system, the BES solution, with the expectation that the new system will at minimum	validate FNS and DHS functional and technical requirements and system	4 3 Me	d Open	during Epic demo 261 (Approvals and Supervision), the ASI committed to the its	items that I clarified with IV&V, that there are feedback given, no	"le d
the design process could lead to BES ity issues and functionality gaps in the	folina, Brad Finding - Issue	8/1/2023 System Design	concerns raised by the DHS testers regarding the usability of the BES system, the BES solution, with the expectation that the new system will at minimum challenges with the user interface, missing functionality, and basic screen provide all functionality found in current applications – but really should	validate FNS and DHS functional and technical requirements and system usability Perform Sprint and Epic demos in alignment with development	4 3 Me	d Open	during Epic demo 261 (Approvals and Supervision), the ASI committed to the its hosting another demo to address all the feedback. Changes raised late in the feedback	tems that I clarified with IV&V, that there are feedback given, no back means design is ok. I rec'd an emal back from Joe F. that IV&V	"le of
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Title Reporter Type	Date Category		Significance	Recommendation	Event Horizon Impact Pro	robability Priority	Status	Status Update	Client Comments	Vendor Comment
2 The lack of technical documentation may Heath, Dustin Finding -	4/27/2023 Security and	In April, the ASI/DHS system security plan (SSP) authors began writing	Once the system architecture and design have been completed, the SSP	Determine when the infrastructure design baseline will be completed	Prior to the start of 5	4 High	Open	03/30/2024 - During March, the DHS/ASI security teams focused on	Cheff Commence	Vendor comment
lead to incorrect implementation statements Risk	Privacy	implementation statements. Currently, the technical documentation		Determine when documentation will be created, updated, and available for	the third-party			documentation and the Tenable Nessus scans on the base BES Production		1/12/2024 -
or delay the System Security Plan			of the SSP is scheduled to be published August 15th, 2023, and the final SSP (ready for federal partner review) is scheduled for September 15, 2023. The		assessment.			environment (without the Secure Enclave). The Secure Enclave is not included in the BES 1.0 Core Release and will not be part of Pilot. Therefore		Progress should
		Implementation statements are currently being written from the perspective	SSP is a large technical document with hundreds of controls and control	review of all SSP controls for content and accuracy that have been written a				the upcoming 3rd party security assessment will not include the Secure	•	"In process". Da
		of how the system should be designed from the SSP author's perspective	enhancements, and each one requires an implementation statement of how	drafts prior to the start of the third-party assessment and submission of the				Enclave. Security documents (e.g., data flow, network diagrams, Plan of		Rolla conducte
		instead of how the system is actually designed. The SSP authors need to	the control or enhancement has been met.	SSP package to federal regulators. This will allow the SSP authors to update				Actions and Milestones (POAMs), and procedural documents such as		level review of ti
		know and use documentation such as System Architecture and Design, network topology, dataflow, ports and protocols, tools used for logging, etc.		controls with changes from Design through Implementation.				Change Management procedures) may not be complete for the 3rd party assessment starting in April, which may result in potential findings and		controls and sha with Barbara/Vi
		network topology, datanow, ports and protocols, tools used for logging, etc.						POAMs for remediation if not available. Additionally, DHS reported that		feedback during
								several DHS Security and Privacy policies were not updated in the past 365	5	week of Decemb
								days as required by NIST 800-53. 02/29/2024 – The security staff resolved		(prior to submitt
								issues in the Google Assured Workloads services for the Secure Enclave. Th ASI continues to remediate findings from the vulnerability and compliance	e	to SSA). The implementation
								scans on the environment and work through issues related to the Tenable	•	for each control
								Nessus credentialed scanning. The security team rescheduled the due date	s	updated to refle
								for the supporting security and privacy documentation for the SSP and		current status a:
								intends to be completed by March 4th, 2024. Since there is a proposed		12/12. This acti should not be
								schedule change in the project's "Go-To-Green Plan", this finding remains risk instead of being elevated to a realized issue. 01/31/2024 – The DHS	3	confused for a s
								and ASI security teams continue to work on the secure enclave and		controls assessn
								documentation that supports the SSP. Documents scheduled for completio	n	which is audit-st
								by 1/31/24 include the secure enclave SSP additions, incident Response Pla (IRP). Privacy Impact Analysis (PIA). Configuration Management Plan, and	n	validation of the controls — typi
								Continuous Monitoring Plan. Other procedural documents will be complete	d	conducted by a
								by the end of February 2024. As the Independent Security Controls		party.
								Assessment is dependent on the completion of some of these documents		
Development delays could negatively impact. Fors, Michael. Finding -	c/an/ama confirmation and	ASI had previously reported development activities have been slowed as	If the ASI is unable to achieve a velocity that enables them to meet planned	COSTAL - Description - A File of Costal and construction - and de CAST	Investigate 2	3 Med	Open	and artifacts, incomplete documentation may result in assessment finding: 03/31/24 - To address this issue, the ASI reported they built the revised BES	i.	As stated before
the project schedule and delay go-live. Issue	b/3U/2U22 Configuration and Development	As i nad previously reported development activities have been slowed as they have been unable to achieve and/or maintain their expected	milestones, schedule delays may lead to a delayed system go-live date.	(potentially via the weekly DDI status meeting) with an accurate velocity	manufate 3	o med	Open	Project Schedule with some slack/float time. IVV is researching Data		10/31/2023 - V
, , , , , , , , , , , , , , , , , , , ,	_everyment	development velocity. Previously, the development team was challenged	Failure to achieve a level of accuracy in estimating development tasks could	(e.g., story points per day/week/month) and assure that the current velocity				Conversion and the impact, if any, it had on the most recent Schedule delay		mixed bag her
		with accurately estimating development task level of effort (i.e. story	lead to a project schedule that is flawed and unrealistic. Previously, DHS	is accurately and consistently reflected in the project schedule. • ASI provide				The conversion team has some remaining data elements to map. They		are mentioning
		points) and the project has been challenged with producing a project	had indicated, and IVV agreed, that some of these delays were due to some	DHS with the time needed to effectively evaluate the software				reported that the full scope of 'data cleansing' may not be complete before		misunderstand
		schedule that accurately reflects realistic timelines (see Finding #74). The ASI continues to be challenged with finding qualified resources in a timely	ASI BAs lacking the expertise required to create optimal designs and system of specifications that developers could consume without requiring extensive	emonstrations (demos) and elicit productive design discussions with DFS attendees during each demo. • ASI regularly report estimated story points				converting the data. IVV is continuing to research and plans to provide an update in a future report. 02/29/24 - The ASI reported additional delays		MF - improve t design
		manner.	clarification from the ASI BA/SA team. DHS and IVV observed instances	for the total remaining project work to reach go-live and presents a dynamic				that will push out Go-Live to October 2024, based on the draft Go-to-Green		communications
			where ASI RAs/SAs have presented less than optimal designs and left it to	hurn-down chart to track the progress COMPLETE CLOSED • DHS request				plan. The ASI reported the Root Causes of this delay include Excessive		Rama - I am tryi
			DHS (who may lack software or UI design expertise) to improve, which has	the ASI strategically add the right project team resources to effectively				defects, - Lack of Code quality with downstream impacts to include		understand wh
			contributed to unproductive design sessions (see Finding #61). It remains unclear if scope creep has contributed to these delays.	increase velocity. Note that adding additional junior resources may not be a effective as staffing additional expert-level development, analysis, and othe				additional defects and critical blockers causing delays with Sprint and Epic demos and the completion of Integration Testing, - Development delays		development del two months left
				resources that can lead and mentor lunior resources + ASI reviews the				with the Hana/BES interface and Secure Enclave. The draft Go-to-Green		DDI.
				development process and identifies and mitigates the challenges preventing				plan includes reorganizing the development team to have more experience	d	Vic - we wil eval
				them from incorporating Epic demo activities into the project schedule. (9/29/23 - ASI will not be doing this, with DHS approval)				developers focus on critical defects and consistent enforcement of development standards across all development teams and other process		the draft.
				(9/29/23 - ASI WIII not be doing this, with DHS approval)				improvements. 01/23/24 - Ongoing development delays are still affecting		
								the Project, requiring additional development and INT Sprints and		
								postponing Sprint and Epic demos. To keep the planned go-live date the		
								project elected to overlap INT and SIT, but this is subject to the Go-to-Green	l .	
								Plan that the ASI announced at the end of January. 12/31/23 - The ASI reported development delays related to 10 epics but has also produced a		
								reported development delays related to 10 epics but has also produced a mitigation plan to manage these delays and stay on track for go-live. IVV		
								remains concerned that any additional delays might push out the project		
								schedule and implementation milestones. 11/30/23 - The ASI reported		
								delays in interface design and development, and unplanned development effort required to unwind EBT functionality deferred to post-go-live due to		
								effort required to unwind EBT functionality deferred to post-go-live due to a missing requirement for PIN issuance. Additional development sprints were		
	11/29/2021 Project	DHS and the ASI have tried multiple times to rework the schedule with	If estimates for project schedule activities are not accurate, this can lead to		Immediate 3	4 High	Open	missing requirement for PIN issuance. Additional development sprints were 3/31/2024 - The BES Project Schedule that aligns with the Go to Green plan		
estimations diminishes effective planning Issue	Management	results that have not yielded improvement. Concerns with the structure,	constant schedule changes, resources not being available when needed,	based on the project teams past performance and resources available to do				was published by the ASI during this reporting period. The overlap of		
and resource management, which could	mangement	estimating practices, and ability to manage to the schedule persist. The use	rushed activities, and general frustration which can lead to schedule delays, t	he remaining work ASI provide details on how Velocity measures were				Integration Testing (INT) and SIT, and adding functionality into SIT after it		04/10/2024 -
and resource management, which could result in late deliverables, cost increases, and a late on live	mangement	of multiple tools to track resources obfuscate resource management.	rushed activities, and general frustration which can lead to schedule delays, to low quality output, scope changes, and budget issues.	he remaining work - ASI provide details on how Velocity measures were used to calculate the remaining development work - ASI conduct a Root				has started may lead to more delays as seen in prior schedules. 2/29/2024		Please confirm:
and resource management, which could result in late deliverables, cost increases, and a late go-live.	The age of the control of the contro	of multiple tools to track resources obfuscate resource management.  Previous IV&V findings focused on specific schedule components such as	rushed activities, and general frustration which can lead to schedule delays, t	he remaining work ASI provide details on how Velocity measures were used to calculate the remaining development work ASI conduct a Root Cause Analysis (RCA) with DHS and IVV to determine why the BES project				has started may lead to more delays as seen in prior schedules. 2/29/2024  The Project has experienced many delays, the most recent of which was a four-week delay announced the end of January and the draft Go-to-Green		Please confirm description of ti
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ID Trie	Reporter Type	Identified Date Category	Observation	Significance	Recommendation	Funnt Horizon	Impact Probability	Analyst I	Status Hadata	Client Comments	Vendor Comments
70 Insufficient configuration management	Fors, Michael Finding -		The BI-6 DDI Plan Deliverable, Section 5.2 establishes the framework for the		OPEN • ASI adhere to plans for configuration management as documented				3/31/24 - Responsibility for the Configuration Management Plan (CMP)	Cheff Commence	Vendor comments
could lead to development confusion and	Rick	Development	Configuration Management Plan, however, it remains unclear if sufficient	ensures the BES is understood and works correctly. The BES solution	in BI-6 DDI Plan, Section 5.2 and clarify details and/or any changes with DHS			LUW .	reverted to the ASI (previously, the DHS Security Contractor was updating		
reduce the effectiveness of defect resolution	Think.	Development	progress has been made toward establishing CM processes and governance,		ASI validate plans for configuration management with DHS and agree on a				the CMP for related security controls). The ASI is resuming this scope of		10/31/2023 -
				Management that may reduce errors and should provide the project team					work at a time when its resources are stretched and may lead to CMP and		Vic - We provided
			projects Security Plan has yet to be finalized which may include additional	with accurate, dynamic and timely information on some of the configuration					configuration management quality challenges. 2/29/24 - No material		listing, working or
			requirements or decisions that could impact CM. The project currently	items. However, it is critical that DHS/ASI agree to the full list of items that					update in this reporting period. 1/23/24 - No material update in the		plan to implement.
			relies on Github for tracking of some configurations.	are included in the configuration plan along with the details regarding the					reporting period. 12/31/23 - The project will utilize the DHS contractor		MF - Broad categor
				management of the configuration items, reporting and audit features.	configuration management activities and assure defined CM steps and plans				currently assisting with security activities to update the Configuration		Vic - we are working
					are being followed, are effective, and are achieving DHS objectives for CM.				Management Plan (CMP). The scope of work that the DHS contractor is		on the details now
					7/31/2022				responsible for is unclear to IVV. 11/30/23 - The ASI has yet to provide a		This will become m
									detailed list of configuration items to DHS and IVV. IVV has restated this		Important and we
									request to the ASI so that the level of detail is clear. 10/26/23 - The ASI		work to get ahead
									provided broad information on the configuration items being tracked but		the M&O plan.
									have yet to provide detailed configuration items for IVV review. The ASI has		10/11/2023
									deprioritized some configuration management activities, which it intends to		
									perform in preparation for Maintenance and Operation (M and O). 9/28/23	* · · · · · · · · · · · · · · · · · · ·	IV&V requested
									The ASI gained DHS' approval on the items that will be tracked and		list last month and
									monitored as part of configuration management. IVV requested the list last		waiting on the ASI
									month and is waiting on the ASI to respond. 8/31/23 - No material update. 7/31/23 - No material update. 6/30/23 - No material update. 5/31/2023 -		respond - Pleas
											see the following li
									The ASI continues to make progress with its utilization of the ServiceNow Configuration Management (CM) tool. They have recently performed an		of configuration management items
									initial import of Google Cloud Platform server details into the ServiceNow		which are/will
									Configuration Management Database. *** Continued work. Setup in		managed in
									ServiceNow, will be building up instances. Ongoing support and main.		ServiceNow:
									Dont' think still a risk. IVV to discuss. 4/30/2023 - The ASI finalized the		Incident Response
									ServiceNow (SN) modules they will utilize for the project. 3/31/2023 - The		Change/Configuration
									ASI is currently evaluating which Service Now (SN) modules will be the best		Management
63 The lack of early planning and coordination	Reynolds, Finding -	1/21/2021 Integration and	The following planning and execution items have not yet been addressed	DDI project often underestimate the time needed to effectively manage all	OPEN 6. Confirm testing dates with interface partners in writing. 7.	Prior to FAT	5 4	High C	3/31/2024 - DHS and IV&V are currently reviewing the draft Interface Test		
with interface partners may result in	Mark Issue	Interface	and documented by the ASI Connectivity is planned to utilize a presently	the tasks and activities to successfully implement data sharing. A clearly	Complete early proof of concept interfaces to avoid unexpected delays due				Plan published by the ASI this month; we will provide an update on this issu	ie.	
schedule delays.		Management	undefined ETS API Gateway; however, there is no evidence that details have	defined communication plan and schedule that includes the coordination,	to external organization miscommunications or their own internal delays in				in the next report. 02-29-2024 - The MOU/MOAs were completed and the		10/31/2023 - Good
			been determined or documented in this regard There is little evidence of	planning, and execution activities along with milestone dates can minimize	assisting the BES project. CLOSED 8. ASI and DHS conduct a root cause				Interface Control Documents (ICD) are updated. The interface testing team		and accurate as o
			active and sufficient communication with interface partners for	the risk of potential delays. In addition, after planning has been completed,	analysis to determine the reason FDDs were changed without DHS				did not produce the testing plan on February 16th as specified in the draft		end of October.
			coordination, design, and testing activities (Unit Test, SIT, UAT) Interface	interface partners will have to be available during interface implementation					Go-to-Green plan. 01-31-2024 - The final two MOA/MOUs were signed.		Metwith DoTAX (C
									Interface development is behind schedule and will require workarounds		to get appendix
			planning and execution tasks and activities, including those for interface	to ensure that the interfaces are properly developed and tested before	interface partner for the duration of the BES DDI activities. COMPLETED						
			planning and execution tasks and activities, including those for interface partners, are neither resident nor managed within the Project Schedule.	to ensure that the interfaces are properly developed and tested before deploying the system to production.	10/29 2. Identify and document all interface partners' contacts. COMPLETED				when FAT begins. The ASI faces challenges with interface partners that laci		details. Sent to Sco
					10/29 2. Identify and document all interface partners' contacts. COMPLETED 3/31/2022 3. Define a release schedule for each interface to include				test environments. The interface testing team has not scheduled meetings		details. Sent to Sco M. to finalize updar
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