JOSH GREEN, M.D. GOVERNOR KE KIA'ĀINA



STATE OF HAWAI'I | KA MOKU'ĀINA O HAWAI'I DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | KA 'OIHANA LOIHELU A LAWELAWE LAULĀ

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES | KE'ENA HO'OLANA 'ENEHANA P.O. BOX 119, HONOLULU, HAWAII 96810-0119

February 19, 2025

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

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

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

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

Sincerely,

Christine M. Sakuda Chief Information Officer State of Hawai'i

Attachments (2)

mirror_mod.use_y = True mirror_mod.use_z = False elif_operation == "MIRROR_7": mirror_mod.use_x = False mirror_mod.use_y = False mirror_mod.use_z = True

#selection at the end -add ba mirror_ob.select= 1 modifier ob.select=1 bpy.context.scene.objects.active print("Selected" + str(modifier_of print("Selec

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

KEIKI Replatform Off Mainframe (KROM) Project

AND

MONTHLY IV&V REVIEW REPORT

December 24, 2024 | Version 0.1



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BACKGROUND

The State of Hawaii (State), Department of Attorney General (AG), Child Support Enforcement Agency (CSEA) contracted Protech Solutions, Inc. (Protech) on October 2, 2023, to replatform the KEIKI System and provide ongoing operations support. Protech has subcontracted One Advanced and DataHouse to perform specific project tasks related to code migration, replatforming services, and testing. Department of AG contracted Accuity LLP (Accuity) to provide Independent Verification and Validation (IV&V) services for the project.

Our initial assessment of project health was provided in the first Monthly IV&V Review Report as of October 31, 2023. Monthly IV&V review reports will be issued through August 2025 and build upon the initial report to continually update and evaluate project progress and performance.

Our IV&V Assessment Areas include People, Process, and Technology. Each month we will select specific IV&V Assessment Areas to perform more focused IV&V activities on a rotational basis.

The IV&V Dashboard and IV&V Summary provide a quick visual and narrative snapshot of both the project status and project assessment as of December 24, 2024. Ratings are provided monthly for each IV&V Assessment Area (refer to Appendix A: IV&V Criticality and Severity Ratings). The overall rating is assigned based on the criticality ratings of the IV&V Assessment Categories and the severity ratings of the underlying observations.

TEAMWORK AND PERSERVERANCE

"Success is almost totally dependent upon drive and persistence. The extra energy required to make another effort or try another approach is the secret of winning."

- Denis Waitley



PROJECT ASSESSMENT



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



LOW

N/A

MEDIUM

HIGH

IV&V OBSERVATIONS



PROJECT BUDGET*





as it does not include all project activities.

KEY PROGRESS & RISKS

- Testing Progress: Batch testing reached 31%, and FTD execution improved to 35%, but unresolved defects still block 92% of cases, delaying critical test readiness.
- Data Validation: SQL-to-SQL validation and field alignment issues progressed, but persistent interface data discrepancies and mainframe inefficiencies risk cutover delays.
- Schedule Slippage: The KMS Go-Live date reported in the KEIKI Project Schedule 121824 slipped by 22 days (to October 14, 2025), with further delays possible if dependencies are not resolved.
- Interface Integration: Weekly workshops advanced interface testing, but modernization efforts at partner agencies continue to impact timelines.
 - Resource Constraints: Mainframe adjustments improved testing efficiency, but skilled resource shortages for critical testing areas remain a barrier.

PROJECT SCHEDULE – Baseline to Current Schedule Progress



DECEMBER 2024 · KROM PROJECT

ЭСТ	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
()	Y	()	Overall	Project Schedule: Key blockers, including interface data discrepancies and unresolved SQL replication validations, continue to pose risks for schedule slippage. Batch testing progress (31% complete) and the Financial Test Deck (FTD) execution (35% complete) reflect delays in critical testing areas, though resolutions to null and packed binary field issues have mitigated some risks. Ongoing collaboration between CSEA and Protech is required to finalize test data delivery and maintain momentum in testing activities. Schedule slippage is evident in critical testing and dependency areas, which, if not resolved promptly, will jeopardize cutover readiness and extend the project timeline further. The project schedule has currently slipped by 22 days as of 12/24/24.
				Project Costs: Contract invoices remain within the total contracted costs. However, resource adjustments for data extraction and validation efforts may necessitate future assessments of budget allocations if delays persist.
				Quality: Weekly testing status reports provide insights into defect trends and batch validation progress but lack comprehensive transparency in key metrics, such as end-to-end data validation outcomes. Risk management activities are being tracked bi-weekly, with updates shared on major issues like data extraction inefficiencies and interface integration challenges. Validation efforts have improved data consistency, but further metrics tracking is essential for monitoring progress in real-time.
				Project Success: Significant milestones include resolving critical data issues (nulls and packed binary fields) and advancing SQL-to-SQL validation checkpoints. While interface workshops and testing sessions have progressed, remaining interface discrepancies and resource constraints highlight the need for continued focus on resolving these challenges to achieve project milestones on schedule.
G	G	G	People	The following new observations were opened to bring attention to potential impact on critical testing areas.
			Team, Stakeholders, & Culture	• Resource Constraints: Skilled resource shortages were observed. The concern is with potential impact to critical testing areas, including interface and Financial Test Deck (FTD) testing.
				 Training Gaps: Ongoing upskilling for CSEA staff in the new KEIKI environment showed limited progress, delaying their ability to fully manage development tasks.
				• Stakeholder Engagement: Weekly interface workshops and risk meetings improved collaboration, but concurrent modernization efforts by partner agencies remain a challenge to timeline alignment.
				 Defect Resolution Progress: Key issues, such as null fields and packed binary data defects, were resolved, reducing blockers for batch and FTD testing.
				• Transparency Needs: Enhanced reporting on resource allocation and defect resolution is required to support timely decisions and improved stakeholder communication.

DECEMBER 2024 · KROM PROJECT

ОСТ	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
		V	Process Approach & Execution	Analysis was performed between the current schedule and the baseline deliverable schedule which resulted in reopening observation 2023.10.002 R2. The following status of deliverables highlight possible gaps in process execution, dependency resolution, and resource management.
				 Batch Testing Progress Possible Cause: Inefficiencies in data extraction and unresolved SQL replication issues. Late Deliverable: Deliverable #11 (Acceptance Test Plan) Planned Date: April 30, 2024 (KEIKI Replatforming Project Management Plan - Final) Estimated Actual Date: June 30, 2024 (KEIKI Project Schedule 121824.pdf)
				 Financial Test Deck (FTD) Execution Possible Cause: Unresolved defects blocking 92% of test cases. Late Deliverable: Deliverable #15 (User Guide) Planned Date: July 3, 2025 (KEIKI Replatforming Project Management Plan - Final) Estimated Actual Date: August 10, 2025 (CSEA KROM - Weekly Test Status Report_12182024 v0.1.docx)
				 Interface Integration Validation Possible Cause: Dependencies on partner agency modernization and incomplete workshops. Late Deliverable: Deliverable #8 (KEIKI System Requirements Definition) Planned Date: March 19, 2024 (KEIKI Replatforming Project Management Plan - Final) Estimated Actual Date: May 25, 2024 (KEIKI Project Schedule 121824.pdf)
				 KEIKI Database Migration Possible Cause: SQL replication discrepancies and validation inconsistencies. Late Deliverable: Deliverable #6 (Code and Data Conversion Plan) Planned Date: February 7, 2024 (KEIKI Replatforming Project Management Plan - Final) Estimated Actual Date: March 15, 2024 (KEIKI Project Schedule 121824.pdf
				 Go-Live Certification Possible Cause: Slippage in testing and integration milestones. Late Deliverable: Deliverable #18 (Go/No-Go Letter Certifying Production Readiness) Planned Date: September 22, 2025 (KEIKI Replatforming Project Management Plan - Final) Revised Date: October 14, 2025 (KEIKI Project Schedule 121824.pdf)
				 Resource and Dependency Management Possible Cause: Resource shortages and unresolved dependencies such as interface discrepancies. Late Deliverable: Deliverable #19 (Transition Signoff) Planned Date: October 6, 2025 (KEIKI Replatforming Project Management Plan - Final) Estimated Actual Date: November 10, 2025 (KEIKI Project Schedule 121824.pdf)
				Performing further root cause analysis and identifying mitigation strategies are needed to overcome potential delays and realign with revised milestones. The significant potential for project schedule slippage necessitates assigning a higher risk rating.

DECEMBER 2024 · KROM PROJECT

NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
		AREA Technology	 System UI refinement tasks are 84% complete, with the walkthrough and validation of the plan pending final approval. Data SQL-to-SQL comparisons and validation checkpoints showed improvements, reducing data alignment inconsistencies. Critical issues in data extraction, such as packed binary field handling, were resolved, enabling progress in batch validation. Security Risk assessments for binary and ASCII file handling were initiated, mitigating potential data corruption risks during file conversions. FTP/SFTP configurations for system interfaces were addressed in workshops, improving alignment with partner agency requirements.
			While progress was made, delays in testing and data validation, along with dependency management, continue to pose risks to the project timeline.
			AREA Image: Organization of the second se

IV&V ASSESSMENT AREAS

People

Process

Technology

status: N/A

TITLE: Enhancement of Resources Allocation

Observation: Critical tasks like "AWS Environment Pub1075 Compliance" and "KMS: Acceptance Test Scripts Development Complete" have 0% completion despite their planned start in October 2023. This indicates potential resource or prioritization constraints. Weekly testing reports highlight slow progress due to insufficient resources (data processing) allocated to batch validation and interface testing. For example, only 16% of batch jobs have passed validation as of December 18, 2024. Though data transfer and processing is the primary issue, downstream considerations for knowledge transfer must also be considered and delivered timely to prevent future testing and validation delays and provide a seamless hand off to CSEA to maintain quality.

Related RAID Log Items:

OBSERVATION #: 2024.12.001

*Risk #32: Migration to a new KEIKI coding language requires extensive upskilling of existing CSEA staff, delaying full control over KEIKI development.

*Action #67: Identifying key programs for training vendors highlights the need for additional resources to support knowledge transfer.

Industry Standards and Best Practices: PMBOK[®] v7 emphasizes resource optimization as part of the "Resource Management" domain. Aligning resource capacity with demand ensures timely task completion.

Analysis: Resource allocation challenges are hindering progress on critical tasks like compliance testing and test script development, evidenced by 0% completion rates and testing backlogs (e.g., only 16% of batch jobs validated). Addressing these issues through skilled resource deployment and upskilling initiatives will mitigate delays, accelerate milestone completion, and align with PMBOK[®] principles for optimized resource management.

Recommendation: (2024.12.001.R1) Enhancement of resource allocation: the vendor team should consider assigning and aligning additional or more experienced resources to the delayed tasks and backlog testing areas such as financials and support UI validation.

	OBSERVATION #: 2024.12.002	status: N/A	TYPE: PRELIMINARY	severity: N/A			
IV&V ASSESSMENT AREAS	TITLE: Strengthen Stakeholder Engagement						
People Process Technology	Observation: Notes from the project progression. Weekly reports indicate protocol issues. Related RAID Log Items: *Risk #31: Engagement with multiple risks. *Risk #35: Interface workshops and	e challenges in joint troubles e stakeholders in concurrent	hooting sessions with IBM d	ue to PII and file transfer igate interface testing			

Industry Standards and Best Practices: ADKAR[®] emphasizes building awareness and desire for change among stakeholders to align efforts.

Analysis: Engaging multiple stakeholders in concurrent projects (Risk #31) is critical to mitigating interface testing risks, but this requires synchronized coordination to prevent delays. Interface workshops and stakeholder meetings (Risk #35) play a key role in fostering collaboration and ensuring timely resolution of interface-related issues, reducing the risk of misalignment in testing and implementation activities.

Recommendation: (2024.12.002.R1) Facilitate regular communication with stakeholders like CSEA through daily meetings to expedite resolution of open issues. This will improve turnaround time for defect resolution and test execution dependencies while strengthening stakeholder engagement.

IV&V	ASSESSMENT
ARFA	S

People

Process

Technology

status: N/A

TITLE: Revise Task Prioritization

OBSERVATION #: 2024.12.003

Observation: Non-critical tasks are being tracked alongside critical ones, diluting focus and potentially straining resources. Financial Test Deck (FTD) testing is blocked by unresolved defects, stalling progress on 92% of pending cases.

Related RAID Log Items:

*Issue #47: Data extraction processes are not optimized, causing delays in cutover activities.

*Risk #63: SQL replication and extracted data mismatches may lead to system failures during application validation.

Industry Standards and Best Practices: SPM (The Standard for Project Management) defines prioritization as essential for maintaining project alignment with strategic objectives.

Analysis: Tracking non-critical tasks alongside critical ones is straining resources and delaying progress on essential activities like Financial Test Deck (FTD) testing, which is stalled by unresolved defects impacting 92% of cases. Refocusing on critical path tasks and resolving key defects, as emphasized by SPM, will prevent cascading delays and enable progress in blocked testing areas.

Recommendation: (2024.12.004.R1) Focus on critical path tasks, prioritize defect resolution in FTD and interface batch jobs, and deprioritize non-critical deliverables. Prioritizing critical deliverables ensures that delays do not propagate through the project timeline and unlocks progress for blocked testing activities.

	OBSERVATION #: 2024.12.004	status: N/A	TYPE: PRELIMINARY	severity: N/A				
IV&V ASSESSMENT AREAS	τιτιε: Establish Progress Mo	TITLE: Establish Progress Monitoring and Reporting						
People Process	Observation: Testing metrics validation at only 21% covera		arying levels of progress, with ar	eas like enforcement batch				
Technology	Related RAID Log Items:							
*Issue #47: Data extraction delays highlight the need for improved progress tracking and reporting.								
	Industry Standards and Best effective oversight.	Practices: IEEE 1012-2016 re	commends verification and valic	lation checkpoints for				

Analysis: Inconsistent progress metrics, such as only 21% coverage in enforcement batch validation, indicate gaps in tracking and reporting that hinder effective oversight. Implementing a real-time dashboard, as recommended by IEEE 1012-2016, will provide actionable insights to prioritize resources and address delays efficiently.

Recommendation:(2024.12.06.R1) Establish Progress Monitoring and Reporting: Implement a real-time dashboard to monitor test execution rates, defect closure, and coverage metrics. Provides actionable insights for targeting resources and resolving delays more effectively.

	OBSERVATION #: 2024.12.005	status: N/A	TYPE: PRELIMINARY	severity: N/A			
IV&V ASSESSMENT AREAS	TITLE: Request Extension for Non-C	TITLE: Request Extension for Non-Critical Deliverables					
People Process Technology		Observation: Some lower-priority testing, such as reporting subsystem batch jobs, reflects 0% progress. Industry Standards and Best Practices: PMBOK [®] v7 encourages scope and schedule flexibility in adaptive project					
Analysis: Delays in non-critical tasks, such as reporting subsystem batch jobs with 0% progress, highlight the need to reallocate resources to critical testing activities. By deprioritizing these areas and requesting extensions, as supported by PMBOK [®] v7, the project can focus on achieving timely completion of high-priority deliverables such as KMS Go Live.							

Recommendation: (2024.12.07.R1) Request Extension for Non-Critical Deliverables: Deprioritize non-critical testing areas and request extensions for their delivery to reallocate focus to critical testing. To ensure timely completion of high-priority deliverables such as KMS Go Live.

		OBSERVATION #: 2024.12.006	status: N/A	TYPE: PRELIMINARY	severity: N/A		
IV&V ASSESSMENT AREAS		TITLE: Request Extension for Non-Critical Deliverables					
People		Observation: Risks related to depend	encies, resource availability	, and stakeholder approvals	s are not explicitly		
Process	mitigated in the schedule. Weekly reports highlight an increasing trend in defects, with 480 defects logged as of December 18, 2024. Related RAID Log Items:						
Technology							
		*Risk #63: Data extraction issues high	light recurring risks that mu	ust be mitigated.			

*Risk #35: Interface testing risks emphasize the need for robust risk tracking and mitigation strategies.

Industry Standards and Best Practices: ISO/IEC 16085:2021 highlights risk management as a critical process for life cycle projects.

Analysis: The increasing trend in logged defects (480 as of December 18, 2024) and unmitigated risks related to dependencies and resource availability emphasize critical gaps in risk management. Developing a robust risk mitigation plan, as recommended by ISO/IEC 16085:2021, will address recurring issues in defect-prone areas like financials and interfaces, reducing the likelihood of further delays.

Recommendation: (2024.12.08.R1) Establish a risk mitigation plan targeting defect-prone areas such as financials and enforcement systems, proactively reducing the likelihood of additional delays caused by recurring issues.

IV&V ASSESSMENT	OBSERVATION #: 2023.10.002	status: Reopened	type: Risk	severity: Moderate	
AREAS	TITLE: Project Management Resp	oonsibilities			
People					
ProcessObservation: Project management responsibilities may impact effective project execution. The related RAID Items that are overdue or at risk for causing project slippage include: •Batch Testing Progress Late Deliverable: Deliverable #11 (Acceptance Test Plan) Planned Date: April 30, 2024 (KEIKI Replatforming Project Management Plan - Final) Estimated Actual Date: June 30, 2024 (KEIKI Project Schedule 121824.pdf)					
	 Financial Test Deck (FTD) Executi Deliverable at risk: Deliverable Planned Date: July 3, 2025 (KEII Estimated Actual Date: August 	on #15 (User Guide) KI Replatforming Project Mana	agement Plan - Final)	.82024 v0.1.docx)	
	 Interface Integration Validation Late Deliverable: Deliverable #8 (KEIKI System Requirements Definition) Planned Date: March 19, 2024 (KEIKI Replatforming Project Management Plan - Final) Estimated Actual Date: May 25, 2024 (KEIKI Project Schedule 121824.pdf) 				
	 KEIKI Database Migration Late Deliverable: Deliverable #6 Planned Date: February 7, 2024 Estimated Actual Date: March 1 	(KEIKI Replatforming Project	Management Plan - Final)	
	 Go-Live Certification Deliverable at risk: Deliverable Planned Date: September 22, 2 Revised Date: October 14, 2025 	025 (KEIKI Replatforming Proj	ect Management Plan - F		
	 Resource and Dependency Mana Deliverable at risk: Deliverable Planned Date: October 6, 2025 Estimated Actual Date: Novemb 	#19 (Transition Signoff) (KEIKI Replatforming Project N	. ,		
	Industry Standards and Best Pract quality and resource management		ne best practices for proje	ect planning, schedule, cost,	

IV&V ASSESSMENT		OBSERVATION #: 2023.10.002 R2	status: Reopened	type: Risk	severity: Moderate		
AREAS		TITLE: Project Management Responsibilities cont.					
People							
Process							
Technology	Analysis: An evaluation between the current schedule and the baseline deliverable schedule has identified sever deliverables at risk. The potential root causes include an overly ambitious project timeline, unforeseen delays it						

Analysis: An evaluation between the current schedule and the baseline deliverable schedule has identified several deliverables at risk. The potential root causes include an overly ambitious project timeline, unforeseen delays in resolving testing issues and defects, constraints in batch load scheduling, and unavoidable delays due to long runtimes. The potential risk of impacting the project schedule warrants reopening this earlier observation and assigning a moderate risk rating.

Recommendation: (2024.12.004.R1) Determine the root causes of delays and develop plans to address them.

- Perform a root cause analysis including defining the problem, brainstorming possible causes, and developing a plan to address the root cause of the problem such as resource constraints, dependencies, and undefined tasks. Assess potential opportunities for creating parallel workstreams and efforts.
- Based on the experience of the last two months, create a realistic schedule based on the time and resources needed to perform tasks.

Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

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

Criticality Rating

G

NA

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

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

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

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

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

TERMS

RISK An event that has not happened yet.

ISSUE

An event that is already occurring or has already happened.



Severity Rating

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

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

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



TERMS

POSITIVE Celebrates high performance or project successes.

PRELIMINARY CONCERN Potential risk requiring further analysis.



Appendix B: Industry Standards and Best Practices

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

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

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



Appendix C: Prior Findings Log



indings Log

	ORIGINAL	CURRENT		INDUSTRY STANDARDS AND BEST					
YPE	SEVERITY	SEVERITY	OBSERVATION	PRACTICES	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE C
isk	Prelim	Moderate	Untimely project management responsibilities may impact effective project execution. The review of prior findings confirms that several closed issues correlate with ongoing challenges in data validation, resource management, interface dependencies, and testing progress. To ensure project success and minimize cutover risks, reopening these findings and implementing corrective actions are advised. Dependencies such as task 593 for "KMS: Acceptance Test Scripts Development Complete" remain unfulfilled. Weekly reports identify unresolved data file dependencies and incorrect file formats (e.g., GDG issues in batch jobs), further delaying progress. Linear task sequencing contributes to delays where tasks could feasibly run in parallel (e.g., compliance and database migration). Financials have 0% validation coverage in the refined UI, highlighting the backlog.	demand ensures timely task	Previous: The Protech Project Manager provided a draft project schedule; however, it was incomplete and listed due dates that were already missed for several deliverables. The implementation of strong schedule and resource management practices early will help the project start off right and stay on track. Protech's Project Manager is experienced with similar implementations and is working collaboratively with the project team to address feedback. Possible root causes or contributing factors are turnover of project managers, an aggressive project timeline, and need for additional project management support. Another possible root cause is Protech's need to revisit the project RFP and submitted proposal to reduce the misalignment of expectations, creating longer deliverable review cycles. Feedback on preliminary deliverables does not appear to be adequately addressed. For example, the need for a resource loaded schedule was communicated verbally and in meetings repeatedly. Current: Unresolved dependencies, such as task 593 and data file issues are delaying progress on critical testing milestones like "KMS: Acceptance Test Scripts Development Complete." Addressing these delays through resource reallocation, collaboration with State partners, and adherence to IEEE 12207-2017 standards will ensure smooth integration of KEIKI system interfaces and uninterrupted downstream task progression. Delays caused by linear task sequencing, such as in compliance and database migration, highlight the need for implementing parallel workstreams to address backlogs like the 0% validation coverage in financials. Following ISO/IEC 16085:2021, initiating concurrent workstreams across subsystems will improve testing throughput and reduce dependencies, expediting overall project progress.	project tasks. • Provide the appropriate detail of tasks, durations, due dates, milestones, and key work products for various parties. CSEA assigned tasks should also be clearly reflected in the project schedule. • Obtain agreement on the baseline schedule and then hold parties accountable for tasks and deadlines. REOPENED : 2023.10.002.R2 – Determine the root causes of delays and develop plans to address them. • Perform a root cause analysis including defining the problem, brainstorming possible causes, and developing a plan to address the root cause of the problem such as resource constraints, dependencies, and undefined tasks. Assess potential opportunities for parallelizing workstreams and efforts.	Reopened	 11/30/23: This was originally reported in the October 2023 IV&V Monthly Report as a preliminary concern but was upgraded to and rewritten as a risk this month with recommendations. The project is still challenged with insufficiently updating deliverables and continued delays in the proposed project schedule. 12/31/23: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). More rigor on foundational project management practices is needed to prevent further delays and increase the quality of project execution. The approved project schedule still lacks detailed task to adequately plan project resources and monitor project performance. Although the project schedule has some percentage completion, the process to monitor and calculate metrics is unclear. 01/31/24: Despite several meetings, there is still a need for a greater shared understanding of schedule concerns between Protech and CSEA. This risk will continue to be evaluated with the recent addition of Protect resources to improve the timeliness of project execution, a recommendation was added that project schedule doas not include all project tasks and is being updated to include more granular-level project activities. One recommendation was diosed as Protech added additional project management resources. 03/31/24: Closed two recommendations as a new, separate observation with recommendations related to schedule and resource management was opened. Refer to observation 2023.03.002. Project managers thould prioritize working closely together to assess upcoming activities, the impact of project status meding. 04/30/24: The CSEA project manager still needs to independently validate the variance and citical path. For monthly steering committee and project status meetings, it would be beneficial for CSEA to take a more active role in communicating their perspective on project progress to stakeholders. 05/31/24: The risk was closed as project management activities are being executed more t	Original Close: () 5/31/2024 () Reopened: 12/24/24 () 1
isk	Moderate	Moderate	There is a risk for delays in the data extraction process, which is critical for the cutover activities, due to reliance on shared mainframe resources, inefficiencies in data extraction programs, and long download/upload times. This could impact the project by increasing costs, compromising the quality of the overall solution, and causing operational downline of 4 to 5 days during the cutover weekend, thereby extending the project timeline.	IEEE 1012-2016	The data extraction process is critical for the cutover activities and current projections show potential for significant delays. This issue results from reliance on shared mainframe resources, inefficiencies in data extraction programs, and long download/upload times. Each time new data is needed for testing, the entire database must be extracted, which is time-consuming. CSEA is evaluating a SQL replication strategy to replace the current process and has assigned two dedicated resources to identify and test this approach. Daily meetings with DDI and CSEA have been established to collaborate on this issue. The target for validating this approach is July 31st. The static data collected from the data extract process projects a worst- case scenario of 12 to 36 days to fully extract ADABAS data to the 374 flat files, including downloading and uploading the files. This arises due to : 1) CSEA uses a shared mainframe, 2) inefficiencies of data extraction programs, 3) download/upload times. The data extract process is centra to the cutover activities completing over Fri/Sat/Sun. If not improved, CSEA may face 4/5 days operational downtime for cutover weekend.	stages. 2024.08.001.R2 - Validation of Extracted Data Consistency • Standard(s): IEEE 1012-2016 Emphasis: Validation ensures that the system meets its intended use and satisfies user needs.	Open		

	CURRENT	OBSERVATION	INDUSTRY STANDARDS AND BEST PRACTICES	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE C
					O Recommendation: Assess the risks associated with the conversion and handling of binary and Ascii files. Discrepancies in binary file counts and the use of converters for 27 files were discussed. It is recommended to perform risk analysis on these conversions, ensuring that any potential data corruption or loss during conversion is identified and mitigated. Consider implementing additional testing and validation for these specific files.			
					2024.08.001.R4 - Resource Management and Space Availability • IEEE 1012-2016 Emphasis: Resource management is crucial for the successful execution of project activities. o Recommendation: The observation regarding potential space risks should be taken seriously. Conduct a resource assessment to ensure that there is sufficient storage and computing resources to handle the extraction, conversion, and processing of data. This should be done before the extraction process begins, with			
					contingency plans in place in case of resource shortages.			

YPE		CURRENT		INDUSTRY STANDARDS AND BEST	T ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE C
isk	Moderate	Moderate	The timing of other State of Hawaii modernization projects impacts the ability to properly design KEIKI system interfaces and will necessitate the need for interface modifications after its deployment, which can lead to additional costs, delays, and disruption to the system.		running on the State's mainframe for system file and data exchanges with multiple State of Hawaii agencies. The timing of multiple agencies moving off the mainframe at different times will result in the need to modify KEIKI system interfaces after the system has been deployed. Until other State modernization projects are completed, the KEIKI project cannot perform server-based data exchanges and will need to continue to interface via the mainframe. In addition, as the KEIKI project involves integrating a modernized child support system with existing legacy systems, there may be other technological and architectural gaps that arise. These gaps can include differences in technology stacks, such as programming languages,	CLOSED: 2024.07.001.R1 - It was recommended that CSEA meet with the new Chief Data Officer. And also to meet with the EFS team to identify any potential impacts to CSEA and align with IT policies. CLOSED: 2024.03.001.R1 – CSEA should coordinate regular meetings with impacted State of Hawaii agencies. • Roles, responsibilities, expectations and interface requirements should be clearly defined to ensure information and project status is proactively communicated for the various modernization efforts. 2024.03.001.R2 – The projects should properly plan for interfaces so that they are flexible enough to accommodate future changes and are compatible with other agencies. • Clearly identify all the interfaces that the system will interact with and how they will communicate. • Develop interfaces and data structure that are flexible enough to accommodate changes to the interfaces. • Detailed testing will be required as the various departments upgrade their systems to ensure compatibility.	Open	 04/30/24: CSEA organized a meeting with other Departments in April to exchange information regarding the status of their respective system modernization efforts, specifically those related to the shared mainframe and dependencies. 05/31/24: Accuity closed one recommendation as CSEA is coordinating regular meetings with impacted State of Hawaii agencies to monitor the status of their modernization projects and mainframe operations. CSEA is planning to develop an inventory of interfaces to share at an upcoming meeting with impacted Departments. 06/30/24: CSEA and Protech agreed to develop a list of interfaces categorized into three groups: 1) Axway (source: AWS vs. Mainframe); 2) Mainframe (group of interfaces on the mainframe with departments pointing to Axway), and 3) Cyberfusion. They also decided to share this list at the next monthly meeting with State Departments. 1V&V will continue to monitor the coordination with other State of Hawaii modernization projects. 7/31/24: TFS 'new Chief Data Officer and the EFS team have been contacted and will be meeting with CSEA. 8/30/24: ETS' new Chief Data Officer has been aligned as a key stakeholder and is in the process of focusing on data governance policies and interface concerns with the EFS team (2024.07.001.R1) IV&V will continue to monitor and update as the focus on policies and interface concerns progress. 	r II

YPE		CURRENT	OBSERVATION	INDUSTRY STANDARDS AND BEST		RECOMMENDATIONS	CTATUC	STATUS UPDATE	CLOSED DATE
							STATUS	9/30/24: The new Chief Data Officer is engaged in the focus on data governance policies and interface details with the EFS team, this effort will be ongoing through project Go-Live. 10/31/24: 2024.07.001.R1 (Alignment of Data Policies with Chief Data Officer) CSEA has conducted the recommended meetings and established alignment on data exchange policies and impact assessments, this recommendation on to data exchange policies and impact assessements, this recommendation and be closed. Continued coordination could be noted as a follow-up item rather than an open recommendation. 2024.03.001.R2 (Interfaces) Open/In Progress: Good progress has been made in identifying interfaces, and with continued focus on data coordination and flexibility planning, we can further strengthen alignment with this recommendation. Ongoing efforts to secure reliable data and enhance adaptable structures will help ensure compatibility and reduce potential disruptions in the future. 11/27/24 - (2024.03.001.R2) – Interface Planning and Compatibility All interfaces have been cataloged, classified as inbound, outbound, or both, with their communication protocols clearly defined. This includes identifying dependencies with external systems from partner agencies. Further validation of interface files, particularly those with missing or incomplete data, is being prioritized during ongoing batch testing. Interfaces and related data structures have been developed with flexibility in mind, allowing for future changes without significant redevelopment. The system design supports updates to schema or message formats. Continue refining flexibility by testing adaptability with mock data representing potential future scenarios and configurations. Interface validation testing is underway using production-like files. Initial validations highlighted discrepancies in legacy and replatformed outputs, which are being addressed iterative). Detailed testing will continue alongside integration challegis exeltina gingery systems incompatible with upgrades to ext	
isk	Moderate		Industry Standards and Best Practices: IEEE 730-2014 standard recommends that status reports include certain key information to ensure effective communication of testing and quality assurance activities.		There is currently a weekly testing report provided to the Project Team. The report conveys the number of testing scenarios in process, however the report does not offer a total number of test cases to be processed for each workstream, nor does it convey full metrics, such as percentage of completion of the total scope within the testing categories and how those align with the project schedule parameters. This can contribute to risk when total transparency is not displayed.	actions based on the current state of testing, as well as the next steps for future testing activities. Ensure that key stakeholders	Closed	9/30/2024: 2024.08.001.R1 (Testing Reports) Significant improvements have been made in the most recent reports and provide a clearer understanding for all stakeholders. IV&V will continue to monitor as these improvements to visibility progress. 10/31/2024: 2024.08.001.R1 (Testing Reports) The weekly testing reports now include pass/fair ates, coverage metrics, defect tracking, and milestone updates, providing a clearer understanding of testing progress and project health. This aligns with the recommendation for improved reporting metrics and stakeholder communication.	

		CURRENT	OBSERVATION	INDUSTRY STANDARDS AND BEST PRACTICES	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE C
		Moderate	The project faces a significant risk of incurring extensive costs for delivering the necessary data to test the refactored KEIKI application, potentially leading to delays in the project timeline and increased budget constraints. Despite discussions with Protech and AWS, the issue remains billing-related rather than technical, necessitating ongoing negotiations with ETS to determine financial responsibility. CSEA has developed a second option to use a SQL to SQL transfer in to reduce the amount of federal funding needed for this piece of the contract. In the month of July testing will be conducted to test the viability of this cost saving measure. A decision will be made at the end of July. With the new State CIO starting on August 15, decision-making could be further delayed into the Fall.		Meetings have been held with Protech to discuss the data extraction costs. Protech has engaged AWS for options, but AWS indicates the issue is billing-related, not technical. The cost of delivering data for testing is critical for the KEIKI project, but CSEA finds the current costs prohibitive. Discussions with Protech and AWS indicate the need to resolve the billing issue rather than technical challenges. Without a resolution, this issue could impact the project timeline and budget. CSEA continues to engage ETS to negotiate a cost cap and explore alternative solutions.	2024.07.002.R1 – Continue negotiations with ETS to secure financial support for data delivery. Engage in discussions to find a feasible cost structure that aligns with project budgets. • Ensure clear communication of cost concerns and impacts to ETS.	Closed	37AIOS UPDATE 737J24: The SQL to SQL method for data extraction and transfer has been confirmed. CSEA has addressed the issue of cost.	T/31/2024 T
sue	Moderate		Inadequate schedule and resource management practices may lead to project delays, missed project activities, unrealistic schedule forecasts, or unidentified causes for delays.		to get the project back on track. Although the project metrics are showing a 17-day variance, some project tasks are delayed 1 to 2 months from the approved baseline including building the KEIK database, developing system test excution, etc. CSEA should have a clear understanding of the impact of delays on the overall timeline and validate the 17-day schedule variance.	2024.03.002.R1 – Based on the complexity of the KEIKI project, review and refine the schedule regularly with detailed tasks, realistic durations, and adequate resources. • The project managers should meet weekly to discuss the project schedule, continue to identify detailed-level tasks based on high- level timelines, and identify schedule and resource related risks. • The CSEA project manager should conduct independent reviews of the schedule and project metrics, proactively communicate upcoming State tasks to CSEA stakeholders, create State specific detailed schedules, and communicate any concerns with the quality of vendor execution. • The Protech project manager should be executing tasks based on the approved schedule, identify schedule variances, ensure all project resources are on track, and report on quality and project metrics to ensure the project is meeting its objectives and goals.		04/30/24: Project managers started meeting regularly to review the project schedule. The project managers will do a deeper analysis of the upcoming technical tasks, and then recalibrate the project schedule in May. 05/31/24: Protech delivered a draft of the replanned project schedule and analysis for CSEA's feedback and approval. The revised schedule maintains the original Go-Live date. 06/30/24: Issue closed. The schedule was updated and the 17-day variance was successfully mitigated, ensuring the project remained on track. The project schedule continues to be discussed weekly. IV&V encourages the CSEA PM to conduct independed reviews of the schedule and project meisci. VKAV will continue to monitor progress made on schedule and resource management practices.	6/30/2024 T d e T d

	ORIGINAL	CURRENT		INDUSTRY STANDARDS AND BEST						
YPE	SEVERITY	SEVERITY	OBSERVATION	PRACTICES	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED	
reliminary	N/A		Additional information is needed regarding Protech's program		In February, Protech delivered the System Requirements Document and		Closed	03/31/24: Protech is planning on a presentation in April or May to explain how		2024
			development and testing approach.		Test Plan which are still under review. CSEA already provided a number			their testing approach will ensure that the new system and user interface will		
					of comments for both deliverables requesting additional clarification or			maintain the same functionality as the old system. Without documented		
					additional documentation. Both deliverables do not provide sufficient			requirements, it is still unclear how program development progress, testing,		
					understanding of Protech and One Advanced's approach for the			and acceptance will be managed and monitored.		
					program development and testing phase. There needs to be a clearer					
					mutual understanding of how Protech's development and testing			04/30/24: Protech will present their testing approach in May. The		
					approach will ensure that the new system and user interface will			presentation is important as test scripts are finalized, and system testing is		
					maintain the same functionality, data, and system interfaces as the old			approaching.		
					system. The System Requirements Definition deliverable is high-level					
					documentation of items such as source code, data component, and			05/31/24: Protech's testing approach presentation was pushed back to June.		
					interface tables but does not actually capture the required functionality			The presentation is critical as test scripts are finalized and system testing		
					using industry standard format for requirements. Documenting			begins in June.		
					requirements is especially important for the development of the new					
					front-end user interface (UI). The System Requirements Definition			06/30/24: Preliminary closed. CSEA acknowledged the risk associated with not	t	
					deliverable included a User Interface section but does not include			having defined UI system requirements. Instead, the test scripts are used as		
					sufficient information regarding UI requirements. Protech has another			the requirements. The teams collaborate closely and hold regular test		
					UI Refinement plan deliverable due in May 2024, however, it is unclear			meetings to ensure alignment and thorough testing.		
					if UI requirements will be included in that deliverable.					
								IV&V will continue to monitor the clarification of the program development		
					If system requirements will not be used to manage development of UI			and testing approach.		
					as well as replatforming and refactoring of code work, then it is					
					important to understand how Protech and One Advanced are planning					
					to manage and report on development progress. Additionally, without					
					documented system requirements, testing will be even more critical for					
					identifying gaps in or issues with functionality during the development					
					process. CSEA also has a number of comments and questions on the					
					Protech Test Plan deliverable. In addition to the System Test					
					Plan, Protech is developing an Acceptance Test Plan (UAT Plan)					
					deliverable due in April 2024 which may help to provide additional					
					clarification of the comprehensive testing strategy and delineation of					
					testing responsibilities between Protech and CSEA.					
					CSEA plans to work with Protech to clarify and refine both deliverables.					
					IV&V will continue to monitor this preliminary concern as additional					
					information is discovered.					
					information is discovered.					

Vor	ORIGINAL	CURRENT	OBSERVATION	INDUSTRY STANDARDS AND BEST	r ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE C
irk isk	SEVERITY Moderate	Low	Deservation Ineffective project status meetings and reports can lead to delayed decision-making, lack of accountability, and reduced morale.		Weekly status reports are provided with a dashboard of the project status, high level schedule, late tasks, tasks planned this week, open tasks, 30-day look ahead, deliverable status; risks log, key decisions, change requests, and other project information. Despite numerous data points, the weekly project status reports may not give a complete picture of the project's progress. To get a better understanding of any delays, risks, issues, or action items, additional research and analysis of past reports; review of the Microsoft Project schedule, and inquiry with project members is necessary. For example, late project deliverables may be listed as simply "in progress"; however, one is unable to determine how many additional days the deliverable was pushed back	CLOSED: 2024.01.001.R1 – CSEA should play an active role in refining the project status report and providing topics for weekly project meetings. • Contribute to the improvement of project meetings and reports that actively engage team members and highlight key information relevant to the audience to promote problem-solving and constructive dialogue.	Closed	 STATUS UPDATE O2/29/24: A new recommendation was added and two recommendations were closed. Two recommendations were closed as CSEA and Protech worked together to improve project status reports to be more clear, meaningful, and relevant to the audience. The streamlined status reports are facilitating greater understanding and allowing more time for meaningful discussion amongst project states helders. O3/31/24: Although improvements were made to project status reports, they could be further improved by outlining delayed tasks and upcoming activities to ensure stakeholders are adequately prepared. CSEA continued to refine success metrics to prepare for reporting which will begin next month. O4/30/24: Accuity closed two recommendations. Project status reports continue to be refined and now clearly report tasks that have been rescheduled from the previous week's reporting period. CSEA did not start reporting on success metrics in April as planned. O5/31/24: Accuity doreased the severity rating from Level 2 (Moderate) to Level 3 (Low). The CSEA PM presented some of the project's key success metrics at the May Steering Committee Meeting. High-level pre-delivery testing metrics were provided in May. O6/30/24: Risk closed. As system testing started in June, the team started adding a Weekly Test Report. The report outlines the testing scope, the defects that were retested and validated, and gives a summary of the progress of all test cases. IV&V will continue to assess the effectiveness of project status reports and meetings. 	6/30/2024 T d s t
ositive	Moderate		The Automated Application Assessment process was well planned and executed.		Protech's partner, Advanced, worked closely with CSEA's technical SMES and outlined a clear, well-defined process to collect and assess the KEIKI mainframe application in preparation for the migration and code conversion. Advanced's weekly status updates and follow-ups helped all stakeholders understand their roles, responsibilities, outstanding tasks, and status of activities. Their final assessment report was comprehensive, data-driven and insightful, and prepared the project team well as they begin the next phase of legacy code and data system migration.		Closed	N/A	01/31/24 C

VPF		CURRENT	OBSERVATION	INDUSTRY STANDARDS AND BEST PRACTICES	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE
isk	Moderate	Moderate	Complex data system migration requirements, combined with incomplete documentation and the absence of a formalized process for non-code tasks, may lead to project delays, unmet contract requirements, and quality issues.		delays if not properly planned and managed. The KEIKI system's incomplete documentation and multitude of jobs, workflows, interfaces, and interface files pose a risk of overlooking certain elements, making it challenging to track and validate migration requirements. The project lacks a formalized process for non-code tasks in the data system requirements collection, migration, and validation activities. The project has a formalized process for application code migration but lacks a clear process for gathering non-code and ancillary elements including hardware, software, interfaces, and batch files. The absence of a separate, formalized process and reliance on manual processes using Excel workhets may result in data loss, poor quality, and technical issues affecting system performance and user experience. The SI's waterfall approach requires upfront gathering and definition of	determining the timeline, tasks, tools, and resources needed to perform these activities. • Develop a formalized data migration acceptance process for the remaining cycles with defined acceptance criteria. • Determine what validation is needed by other agencies and		12/31/23: CSEA appointed two dedicated Data System Migration Leads. It is unclear if Protech also appointed a dedicated lead. A clear plan is still missing, and CSEA documented a formal issue related to the lack of information coordination and redundant requests related to the data system migration requirements. 01/31/24: Risk closed as the inventory of non-code and ancillary elements including hardware, software, interfaces, and batch files was completed and will be validated as part of the technical architecture and system requirements documentation.	01/31/24 R a
ositive	N/A	N/A	The project team members are engaged and the environment between Protech and CSEA is collaborative.	PMI Project Management Body of Knowledge (PMBOK) Chapter 2.2 and PMI The Standard for Project Management (SPM) Chapter 3.2 state the importance and benefits of creating a collaborative project team environment.	The CSEA SMEs appear to be engaged in ongoing Assessment sessions and accountable for timely completing required tasks, providing information, and responding to questions. The project team members regularly seek feedback, input, and clarification in an open and respectful manner. The experience and knowledge of Protech team members combined with the dedication and high level of engagement from CSEA SMEs support the positive project team environment.	N/A	Closed	N/A	11/30/23 C



Appendix D: Comment Log on Draft Report



Comment Log on Draft Report

KROM	Project: IV	&V Document Comment Log		
ID #	Page #	ACCUITY Comment	Commenter's Organization	Accuity Resolution
1	4	The dashboard indicates 7 new observations this month (2 in People and 5 in Process). However, the graph shows 6 total Process observations, despite there being 0 in November. Appendix C suggests that observation 2023.10.002.R2 was reopened—can you confirm if this accounts for the 6th Process observation in the graph? Additionally, should the report include an explanation for why this observation was reopened, as it is currently absent?		 IV&V confirms that the 6th observation is in Appendix C and is Observation 2023.10.002.R2. IV&V agrees with CSEA and will be removing preliminary observation 2024.12.004 since it is covered in observation 2025.12.03. The subsequent observation numbers were renumbered consequentially. The recommendation reopened advises a determination by root cause analysis of delays and developing plans to address them. This recommendation was reopened to reference the schedule slippage statements on pages 4 (Key progress & risks), pg. 5 (Overall-Project Schedule), and pg. 6 (Process- deliverables status)
2	4	The December draft report reflects a change in the Process criticality rating from Yellow Up Arrow (November) to Yellow Down Arrow (December). However, the 5 new Process observations are marked as "preliminary," which typically should not impact the criticality rating until they are validated.		See Appendix C /Process/Observation ID 2023.10.002/Analysis: Current/Recommendations: REOPENED. Reopening a previously closed recommendation allows for immediate impact to the criticality rating. Preliminary observations are not impactful until they are reviewed and validated.

ID #	Page #	ACCUITY	Commenter's Organization	Accuity Resolution
		Can you provide clarification on the factors driving this change in criticality? Was it influenced by the reopening of 2023.10.002.R2 or by other considerations?		
3	App. C	Observation 2023.10.002.R2 was reopened on 12/24/24 after being closed on 5/31/24. However, there is no explanation provided in the main body of the report, and it is only mentioned in Appendix C. Can you clarify whether reopening risks should be explained exclusively in appendices? Or should the rationale for reopening this observation be included in the main report?		IV&V agrees to make the reopening of observation 2023.10.002.R2 clearer and has added it into the main body of the report.
4		In the December draft, there is no page documenting the reopened Process observation 2023.10.002.R2, even though each new preliminary observation has a page.		IV&V agrees to make the reopening of an observation clearer. Pages 14-15 were added, and a new section was added to the Table of Contents titled, "Reopened Observation(s)."
5				

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