

#### OFFICE OF ENTERPRISE TECHNOLOGY SERVICES

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October 25, 2022

The Honorable Ronald D. Kouchi President of the Senate and Members of the Senate Thirty-First State Legislature State Capitol, Room 409 Honolulu, Hawaii 96813 The Honorable Scott K. Saiki Speaker and Members of the House of Representatives Thirty-First 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 Commerce and Consumer Affairs, Business Registration 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 Chief Information Officer State of Hawai'i

Attachment



MONTHLY IV&V REVIEW REPORT

September 30, 2022 | Version 1.0





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# Document History

DATE DESCRIPTION	AUTHOR VERSION
10/10/22 Monthly IV&V Review Report Draft created Sc	ndra Ouye 0.0
Monthly IV&V Review Report Final updated to reflect no comments submitted in Appendix D.	ondra Ouye 1.0



### **BACKGROUND**

The State of Hawaii (State), Department of Commerce and Consumer Affairs (DCCA) contracted Century Computers, Inc. (Pacxa) on July 1, 2022 to provide services for the Business Registration Modernization (BRM) Project to redesign the Business Registration (BREG) Division's business registration processes and modernize its systems. DCCA contracted Aalta LLC (Aalta) to provide project management services for DCCA and also contracted Accuity LLP (Accuity) to provide Independent Verification and Validation (IV&V) services for the BRM Project

Our initial assessment of project health was provided in the first Monthly IV&V Review Report as of August 31, 2022. Monthly IV&V Review Reports will be issued through December 2023 and will 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 focus of our IV&V activities for this report included the completion of a two-month assessment of Technology and the beginning of a two-month assessment of Process.

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 September 30, 2022. 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.

**PLANNING** 

"Plans are nothing; planning is everything."

- Dwight D. Eisenhower



# **PROJECT ASSESSMENT**

SEPTEMBER 2022

## SUMMARY RATINGS

### **OVERALL RATING**



Deficiencies were observed that merit attention and remediation in a timely manner.

**PEOPLE** 



**PROCESS** 



**TECHNOLOGY** 



**CRITICALITY RATINGS** 











## **IV&V OBSERVATIONS**



# PROJECT BUDGET MILLIONS \$1.9 M \$3 \$2 ■ INVOICED ■ TOTAL Only includes contracts. IV&V unable to validate total budget.



## **KEY PROGRESS & RISKS**

- Planning and Discovery activities are progressing but are expected to take two weeks longer than originally planned. It is unclear at this time if these delays will impact the overall timeline.
- · The project implemented some of the foundational project processes and recurring meetings. Additional processes, metrics, and resource plans are still needed.
- Key technical decisions are pending and may impact the project schedule and costs. The Project needs to discuss options and set a plan of action to minimize the potential impact and risk to the project.



# SEPTEMBER 2022 · BRM PROJECT

AUG	SEP	OCT IV&V ASSESSMENT AREA		IV&V SUMMARY
G	•	Overall		Planning and Discovery activities are progressing but are slightly delayed. Key technical decisions may impact the overall project schedule and costs.
				Project Schedule: The Planning and Discovery stages are expected to take two weeks longer than originally planned. It is unclear at this time if these delays will impact the overall timeline (2022.09.001).
				<i>Project Costs</i> : Invoices to-date are within total contract costs. Pending technical decisions may impact project costs (2022.08.007).
				Quality: The quality management plan is a project deliverable that will be completed in the Planning stage.
				<i>Project Success</i> : Project goals were drafted; however, quantitative success metrics need to be defined (2022.08.006).
<b>G</b>		NA	People Team, Stakeholders, & Culture	<ul> <li>Identification of the DCCA workstream lead roles (e.g., data conversion lead, testing lead) and potential candidates within DCCA is pending. It is still unclear if there are adequate DCCA project resources to efficiently perform project work. DCCA project roles and responsibilities should be clearly defined and the resource plan completed as soon as possible (2022.08.002).</li> <li>Selection of the steering committee members is close to being finalized. The governance model and the kickoff of committee meetings should be finalized soon (2022.08.003).</li> <li>The Pacxa and the contracted DCCA project managers seem to be more in sync and getting into a better rhythm with the implementation of recurring project management meetings.</li> <li>The DCCA SMEs continue to be engaged during the Joint Application Requirements (JAR) sessions.</li> <li>High level project communications were drafted and shared with BREG employees.</li> <li>Initial drafts of the organizational change management (OCM) plan, readiness plan, and communication matrix were developed.</li> </ul>

# SEPTEMBER 2022 · BRM PROJECT

AUG	SEP	OCT	IV&V ASSESSMENT AREA	IV&V SUMMARY
<b>G</b>	NA NA		Process Approach & Execution	<ul> <li>The Planning and Discovery stages are delayed and expected to take two additional weeks. Improvements to schedule management processes are needed to better detect and prevent delays (2022.09.001).</li> <li>Pacxa continues to prepare the formal project management plan and detailed project schedule as deliverables of the Planning stage.</li> <li>"As-Is" process discussions and reviews continue to be extended; however, JAR sessions were completed ahead of schedule.</li> <li>Original contract requirements and wishlist requests were discussed during the JAR sessions and updated in the requirements traceability matrix (RTM). Pacxa plans to perform the initial fit-gap analysis of the updated requirements in early October 2022.</li> <li>Some clarifications were made regarding cost management roles and responsibilities. Additional discussions regarding cost management processes as well as further identification of other project costs (e.g., software licenses, data storage, project tools) are still needed (2022.08.004).</li> <li>Weekly project manager and team meetings were implemented. DCCA also plans to kickoff recurring technical meetings in October 2022.</li> <li>A RAID log was implemented to track project risks and issues. Risks will be discussed in the weekly team meetings. The need for separate risk-focused meetings will be reassessed later.</li> <li>The Project evaluated and discussed different project management and configuration management tools.</li> <li>Quantitative success metrics need to be defined (2022.08.006).</li> </ul>
<b>©</b>	•	NA	Technology System, Data, & Security	<ul> <li>Key technical decisions are pending and may impact the project schedule and costs. The Project needs to discuss options and set a plan of action to minimize the potential impact and risk to the project (2022.08.007).</li> <li>The delays in the Planning and Discovery stages pushed back the Build and Validate stage to begin in late October 2022. The Build and Validate stage will kick-off with Joint Application Design (JAD) sessions. Pending technical decisions could impact progress for configuring the solution for the JAD sessions.</li> <li>The data conversion plan is being developed; however, some of the pending technical decisions may impact progress to complete or change assumptions in the plan.</li> </ul>

**IV&V ASSESSMENT** AREAS

People

**Process** 

Technology

OBSERVATION#: 2022.09.001

STATUS: OPEN

TYPE: RISK

SEVERITY: 3

### TITLE: CURRENT PROJECT DELAYS

**Observation:** Current project delays may impact the overall project timeline.

Industry Standards and Best Practices: PMI PMBOK Chapter 2.4 summarizes different schedule management techniques including crashing, fast tracking, variance analysis, and trend analysis.

Analysis: The Planning and Discovery stages were expected to be completed in early October 2022 but are estimated to be two weeks behind schedule. The detailed project schedule is a deliverable of the Planning stage and the information gathered during the Discovery stage to-date will be used to better estimate the work for the remaining stages of the Project. As such, it is unclear if the two week delay will have any impact on the overall timeline.

Improvements to the schedule management processes are needed to better estimate time needed to complete tasks, more quickly detect when tasks are falling behind schedule, and openly discuss options and strategies for minimizing delays. Strong schedule management practices help to keep the project on track and prevent reoccurring delays.

**Recommendation:** 2022.09.001.R1 – Improve schedule management processes.

- · Identify and address the root causes of the delays.
- Implement processes to monitor and report task delays.
- · Consider using project performance metrics to better detect schedule trends and issues.



IV&V ASSESSMENT AREAS

People

**Process** 

**Technology** 

OBSERVATION#: 2022.08.007

STATUS: OPEN

TYPE: RISK



### TITLE: PENDING TECHNICAL DECISIONS (UPDATED)

Observation: Key technical decisions are pending and may impact the project schedule and costs.

Industry Standards and Best Practices: DAMA International's Guide to the Data Management Body of Knowledge (DMBOK), Data Integration and Interoperability describes processes related to the movement and consolidation of data within and between data stores and applications. Institute of Electrical and Electronics Engineers (IEEE) 15288-2015 Section 6.4.5 outlines the various activities and tasks in the design process that includes the refinement and full definition of interfaces. DocuSign CLM also provides best practices for a Salesforce integration in the "DocuSign CLM for Salesforce Administrator Guide".

**Analysis:** This was originally reported in the August 2022 IV&V Monthly Report as a preliminary concern but was upgraded to a risk in September 2022.

There are some key technical decisions that are pending (e.g., DocuSign repository, Salesforce org, NIC Hawaii). Pending decisions could impact progress for configuring the solution for the upcoming Joint Application Design (JAD) sessions in late October 2022 as well as the development of the data conversion plan. These key technical decisions need to be made in a timely manner to prevent impact to the project schedule. Further discussions are still needed to understand potential costs, project impact, and risk mitigation options. A plan of action needs to be developed and closely monitored to manage the many individual but critical tasks needed for timely resolution.

Recommendation: 2022.08.007.R1 – Discuss possible options.

• Risks, costs, and schedule impacts for each option must be clearly communicated and understood.

2022.08.007.R2 - Set and execute a plan of action.

• Detail out the tasks, targeted due dates, and responsible parties.



## Appendix A: IV&V Criticality and Severity Ratings

#### **IV&V CRITICALITY AND SEVERITY RATINGS**

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

### **TERMS**

#### **RISK**

An event that has not happened yet.

#### **ISSUE**

An event that is already occurring or has already happened.

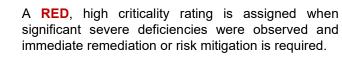
#### **Criticality Rating**

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















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







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



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



### **Severity Rating**

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

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

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



**SEVERITY 1:** High/Critical level



**SEVERITY 2:** Moderate level



**SEVERITY 3:** Low level



**PRELIMINARY** 

**TERMS** 

**POSITIVE** 

Celebrates high

performance or

project successes.



# 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 16085:2020	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 15288-2015	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 Observations Log

### Appendix C: Observations and Recommendations Log

ASSESSMENT	OBSERVATION	71/05	ORIGINAL	CURRENT	OBSERVATION	ANALYSIS	RECOMMENDATIONS	OT ATUO	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
People	2022.08.002	Risk	Low	Seveni	Insufficient DCCA project resources may lead to project delays, reduced project performance, or turnover of project resources.	this inclear at this time if there are adequate DCCA project resources to efficiently perform project work to achieve the aggressive high-level timeline. DCCA did contract an external full-time Project Manager (Aalta) who officially onboarded at the end of August 2022. Having a dedicated and experienced resource in the Project Manager role has been shown to increase project success compared to a resource who is often pulled back to perform regular job duties. DCCA also appointed resources for the OCM and communications lead roles; however, other project roles and resources are not yet identified. The new DCCA Project Manager is working to identify the additional DCCA workstream lead roles (e.g., data conversion lead, testing lead) needed to efficiently and effectively perform project work as well as identify potential candidates within DCCA to fill these lead roles. A common issue in SOH modernization projects is that assigned resources must often balance competing priorities of project work and ongoing operational work. Additionally, assigned resources don't always have the necessary experience or knowledge of how to perform the project tasks. It is critical that a resource plan to backfill and train DCCA resources is developed to prevent project delays.	2022.08.002.R1 – Evaluate project resource needs and acquire additional resources.  - Estimate resource time requirements and identify required knowledge or skillsets.  - Develop a plan to minimize the impact to operations (e.g., backfill, reassign work) so that assigned project resources are not pulled back from project work.  - Get commitments from resources and management for the time needed to perform project work.  2022.08.002.R2 – Provide adequate training and support to assigned resources to be able to perform role.  - Consider performing general project management training so that resources understand general project processes and the purpose of project activities.  - Consider providing additional support and information to resources regarding best practices and common approaches for assigned tasks or areas of responsibility.	Open	09/30/22: DCCA is still in the process of identifying resources to assign to lead roles and brainstorming different resource management strategies (e.g., staging resources for different phases). DCCA also plans to hire additional employees in 2023 to mitigate the impact to operations.  Acculty will continue to assess the adequacy and management of project resources.	ososu valt	ecount number
People	2022.08.003	Risk	Low	Low	A delay in formalizing the executive steering committee may limit the strategic guidance and support to the project.	The Pacxa kickoff presentation noted that a governance model will be developed. The topic of a steering committee was also raised during meetings. However, the selection of the steering committee members and kickoff of the committee meetings are still pending.	2022.08.003.R1 – Assemble and formalize an executive steering committee.  -The size and selection of committee members should balance the representation of key stakeholders with the need for efficient decision making.  -Formalize the committee mission, responsibilities, and the types and the thresholds of decisions that need committee approval in a steering committee charter.	Open	09/30/22: DCCA is still in the process of formalizing steering committee members and documenting the governance model.  Accuity will evaluate the governance model once formalized.		
Process	2022.08.004	Risk	Low	Low	A lack of cost management practices may lead to unexpected or improper costs.	Major project costs were finalized for the system implementor (Pacxa), project manager (Aalta), and IV&V (Accuity) contracts. However, it is unclear how the complete project budget will be managed and how additional costs outside of the major contracts will be identified. For example, certain assumptions were made regarding the use of existing enterprise licensing for DocuSign CLM and Salesforce community licenses. As additional information and clarification of technical requirements is obtained, these assumptions and the potential additional costs must be closely managed. Other costs for project tools (e.g., code repository, project management, testing) should also be considered and managed.	2022.08.004.R1 – Prepare a comprehensive project budget and a schedule of long-term operational costs (e.g., licenses, subscriptions, maintenance, cloud services).  2022.08.004.R2 – Develop DCCA cost management processes.  -Develop processes to prepare cost variance analysis and reports.  - Develop processes to monitor contract deliverables against payment terms.		09/30/22: The contracted DCCA Project Manager will be responsible for monitoring and reporting costs for the project contracts. DCCA still needs to determine who will be responsible for managing and procuring other project costs (e.g., additional licensing, project tools).  Accuity will continue to assess cost management practices.		
Process	2022.08.006	Risk	Low	Low	A lack of quantitative success metrics may lead to differences in the interpretation of project success.	Project goals were drafted; however, quantitative success metrics were not yet defined. Clear and measurable success metrics ensure that everyone is working to the same definition of success, that progress can be monitored, and corrective actions can be taken if necessary.		Open	09/30/22: The Project will work to define KPIs and success metrics.  Acculty will review selected metrics once selected.		

ASSESSMENT	OBSERVATION		ORIGINAL	CURRENT							
AREA	ID	TYPE	SEVERITY	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2022.08.007	Risk	Prelim	Moderate	costs (Updated).	preliminary concern but was upgraded to a risk in September 2022.  There are some key technical decisions that are pending (e.g., DocuSign repository, Salesforce org, HIC). Pending decisions could impact progress	2022.08.007.R1 - Discuss possible options.  -Risks, costs, and impacts for each option must be clearly communicated and understood.  2022.08.007.R2 - Set a plan of action.  -Detail out the tasks, targeted due dates, and responsible parties.	Open	09/30/22: This was originally reported in the August 2022 IV&V Monthly Report as a preliminary concern but was upgraded to and rewritten as a risk this month with recommendations. The project team did discuss a couple possible mitigation strategies to minimize the potential impact to the project schedule of the pending technical decisions. However, there may be other risks that these strategies will create. While it is critical that the decisions are made in a timely manner, it is also important that these options and associated risks must be thoroughly discussed and fully understood by the Project.  Accuity will continue to monitor progress of key technical decisions.		
People	2022.08.001	Positive	N/A	N/A	respectful.	The project team members regularly seek feedback, input, and clarification in an open and respectful manner. The experience and knowledge of Pacxa team members combined with the dedication and high level of engagement from DCCA SMEs support the positive project team environment.	N/A	Closed	N/A		Closed as this is a positive observation.
Process	2022.08.005	Opportunity	N/A	N/A	help to promote frequent and focused discussions.	Recurring meetings help to promote collaboration and transparency, engage project team members, and coordinate various workstreams. They also provide regular touchpoints and communication channels to help keep critical project activities moving forward. Recurring project management meetings provide visibility of all project activities to Pacxa, DCCA, as well as IV&V. Recurring technical meetings have worked well in other projects as standing meeting to discuss different technical issues or topics. Recurring risk meetings promote regular and focused discussion of risks and mitigation strategies.	2022.08.005.R1 – Implement recurring meetings.  -Ensure meetings are productive and fosters open and safe communication.  -Adjust the cadence as needed depending on the needs and activities of the project.	Closed	09/30/22: Weekly project manager and team meetings were implemented. DCCA also plans to kickoff recurring technical meetings in October 2022. Risks will be discussed in the weekly team meetings. The need for separate risk-focused meetings will be reassessed later.		Closed as the Project established a plan for recurring meetings and began to implement meetings.

Appendix D: Comment Log on Draft Report



# Comment Log on Draft Report

### **BRM Project: IV&V Document Comment Log**





ID#	Page #	Comment	Commenter's Organization	Accuity Resolution
1		No DCCA comments.		
2				
3				
4				
5				



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