

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES

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June 27, 2023

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

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

Pursuant to HRS section 27-43.6, which requires the Chief Information Officer to submit applicable independent verification and validation (IV&V) reports to the Legislature within ten days of receiving the report, please find attached the report the Office of Enterprise Technology Services received for the State of Hawai'i, Department of Commerce and Consumer Affairs, Business Registration Modernization Project.

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

Sincerely,

Douglas Murdock (Jun 27, 2023 09:55 HST)

Douglas Murdock Chief Information Officer State of Hawai'i

Attachment



MONTHLY IV&V REVIEW REPORT

May 31, 2023 | Version 1.0



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Document History

DATE	DESCRIPTION	AUTHOR	VERSION	
06/13/23	Monthly IV&V Review Report Draft created	Julia Okinaka	0.0	
06/26/23	Monthly IV&V Review Report Final updated to reflect no comments submitted in Appendix D.	Julia Okinaka	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 People and the beginning of a two-month assessment of Technology. IV&V has areas of limited visibility or access to all project activities that may prevent a complete identification of project risks.

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 May 31, 2023. 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.

LEADERSHIP & CHANGE

"Set your course BY THE STARS, not by the lights of every passing ship."

- Omar Bradley



PROJECT ASSESSMENT

MAY 2023

SUMMARY RATINGS

OVERALL RATING



Significant severe deficiencies were observed requiring immediate remediation or risk mitigation.

PEOPLE



PROCESS



TECHNOLOGY



CRITICALITY RATINGS



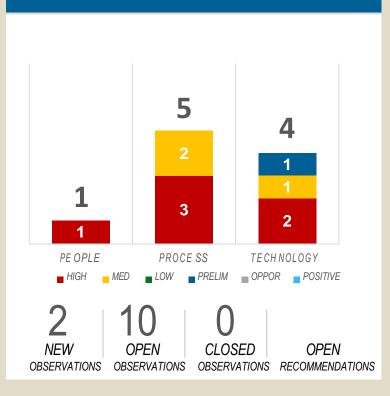




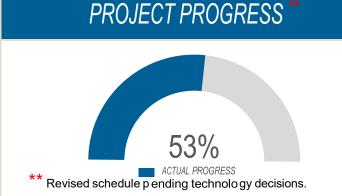




IV&V OBSERVATIONS

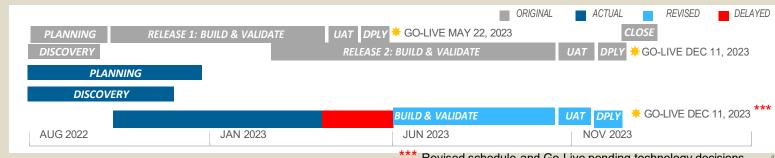






KEY PROGRESS & RISKS

- Due to changes in the technology approach, the project's schedule, cost, and scope of work are unknown.
- The project Go-Live is delayed and the new solution architecture and design are still pending. DCCA and Pacxa must work together to expedite the completion of the Discovery session and find a mutually agreeable path forward.
- All development activity for portal and case management are on hold, and only limited project activities continue.
- Without significant efforts to formalize project processes and address systemic project challenges, delays will continue, and the same issues will continue to hinder project performance under a revised project schedule.
- Insufficient review of design documentation may impact the quality of the solution.



MAY 2023 · BRM PROJECT

MAR	APR	MAY	IV&V ASSESSMENT AREA	IV&V SUMMARY
R	R	F	Overall	The project's December 2023 Go-Live date is delayed, and the new solution architecture and design are still undecided (2023.03.001). DCCA and Pacxa must work together to expedite the completion of the Discovery session and find a mutually agreeable path forward.
				Project Schedule: A new project schedule and revised Go-Live date is pending the completion of Pacxa's Discovery session and assessment report. The Discovery session for the change in the overall solution is delayed due to access challenges (2022.09.001 and 2023.03.001). Only limited project activities continue to progress.
				Project Costs: The overall technology solution direction and financial impacts are pending the results of the Discovery session. The short-term and ongoing costs need to be determined.
				Quality: Draft Quality Management Reports were provided and are pending revisions based on feedback. Client Interim Review results indicated misunderstanding about the level of review required for design documentation which could impact the quality of the solution (2023.05.001).
				Project Success: Draft project success metrics were provided in May and are being updated to reflect comments received (2022.08.006).
\\	R	R	People Team, Stakeholders, & Culture	 DCCA resource constraints and heavy workloads should be considered in making project and technical decisions, and improvements to the review process for design documentation (2022.08.002, 2022.09.001, and 2023.05.001). As the project's Discovery phase is prolonged, it is critical that the team promote a healthy culture of transparency to support the active identification of risks and development of risk mitigation plans (2023.02.001). More active project management support from Aalta is needed to optimize project resources, reduce project stress for employees, communicate instructions and expectations, and improve resource planning for project activities. DCCA employees expressed frustration and the need for improved clarity related to the Client Interim Review process, and review and approval of design documentation.
				 Project governance members are actively engaged and need to continue to play a critical role in removing barriers, making timely decisions, and holding project team members accountable. The organizational change management (OCM) team plans to conduct its next quarterly stakeholder review in June to assess any new stakeholders and changing needs. The project team is evaluating when and what to communicate regarding the new project direction.

MAY 2023 · BRM PROJECT

MAR	APR	MAY	IV&V ASSESSMENT AREA	IV&V SUMMARY
R	R	R	Process Approach & Execution	 The project should take this opportunity to formalize and execute outstanding project management activities (2023.02.002, 2023.01.001, and 2022.09.001). Without significant efforts to address systemic project challenges, delays will continue, and the same issues will continue to hinder project performance under a revised project schedule. Pacxa and DCCA conducted a retrospective after the Client Interim Review, but additional meetings and improvements to other foundational project processes are needed (2023.03.001 and 2023.02.002). Pacxa's Discovery session and assessment report are delayed, preventing the timely evaluation of the technology options to determine a path forward (2022.09.001). DCCA and Pacxa need to work together to expedite the timely completion of the Discovery session. Aalta requested that key DCCA members document their evaluation of the technology options using the Decision Analysis and Resolution (DAR) Process. This is targeted for completion in June. Project risks and mitigation plans should be actively discussed as the project continues to face challenges during this period of transition and replanning (2023.02.001). Aalta provided draft project success metrics in May and is updating the metrics based on feedback received (2022.08.006).
R	R	R	Technology System, Data, & Security	 All data loading and development activity for portal and case management are on hold pending the technology project decisions (2023.03.001). Pacxa completed 60% of their Discovery session to determine the impacts of a single-org Salesforce architecture and other technical decisions on the timeline, costs, resources, and other project activities. The Discovery session is delayed by at least two weeks as Pacxa waits for additional administrative access and separate environment to complete the remaining 40% and identify any conflicts between applications. As Pacxa investigates the impact of migrating their configuration and customization into DCCA's main single Salesforce org, additional information is needed to determine the need for a formalized governance structure (2023.05.002). The project completed Joint Application Design (JAD) sessions 13 and 14, and conducted a joint walkthrough of JAD 13 design documentation to clarify the important relationship between design sessions, design documentation, development, and testing (2023.05.001). Insufficient review and unclear review process of design documentation may lead to development against incorrect business rules and result in rework and quality concerns (2023.05.001). More rigor reviewing project deliverables and a formalized requirements management process could have caught this earlier (2023.02.002, 2023.01.001, and 2022.08.002). Limited data conversion activities are occurring related to schema analysis and data clean-up; however, additional activities are dependent on the pending technical decisions (2023.01.002).* *Accuity is not reporting individual technology risks as formal IV&V observations as they are already tracked by the project team. The rating for this IV&V Assessment Area reflects the cumulative risks.

IV&V ASSESSMENT AREAS

People

Process

Technology

OBSERVATION #: 2023.05.001

STATUS: OPEN

TYPE: RISK

SEVERITY: 1

TITLE: INSUFFICIENT AND UNCLEAR REVIEW PROCESS OF DESIGN DOCUMENTATION

Observation: Insufficient review of design documentation may lead to inaccurate development impacting the quality of the solution.

Industry Standards and Best Practices: PMI PMBOK describes best practices in reviewing and evaluating deliverables through inspection and testing, and ensuring quality activities focus on detection and prevention of errors and defects.

Analysis: DCCA testers reported approximately 250 findings during the Client Interim Review (CIR) executed in May 2023. DCCA and Pacxa are jointly reviewing these findings to properly categorize them for appropriate future action. These are some preliminary CIR results and are subject to change pending additional clarification and information:

- 67 Enhancements: The item is not working per the approved design specification, or there are small changes needed to correct the item.
- 47 Worked as Designed: The items worked as intended.
- 34 More Information Needed: The items require additional information from DCCA for Pacxa to properly categorize them.
- 33 Defects: The items were not working per design.
- 19 Triage in process: Findings are being discussed and triaged by the DCCA and Pacxa.

During these meetings to triage and understand the CIR findings, IV&V observed a gap between the way Pacxa thought some items should function according to approved design documentation, and how DCCA expected the item to work according to internal operations, policies, rules, or a combination of these. IV&V recommended that Pacxa perform a walkthrough of JAD 13 design documentation and what DCCA needed to review as part of their quality review and acceptance process of design documentation. It was discovered that the process for deliverable review and acceptance was not actively coordinated with key DCCA SMES and Aalta to ensure that accepted deliverables were adequately reviewed by the business to accurately capture business requirements. The insufficient review and unclear review process of design documentation may lead to inaccurate development impacting the quality of the solution. Pacxa extended the time period for DCCA to review and approve JAD 13 and 14 design documents.

Furthermore, Aalta was contracted to provide various project oversight services including requirements management and review of project deliverables. More rigor reviewing project deliverables and a formalized requirements management process is needed for the review of design documentation (2023.02.002, 2022.09.001, and 2023.01.001).

IV&V ASSESSMENT AREAS

People

Process

Technology

OBSERVATION #: 2023.05.001

STATUS: OPEN

TYPE: RISK

SEVERITY: 1

TITLE: INSUFFICIENT AND UNCLEAR REVIEW PROCESS OF DESIGN DOCUMENTATION

Aalta has been forwarding DCCA's approval of the design documentation; however, was not following their own process of reviewing deliverables and completing review checklists to ensure quality. Aalta should work with DCCA to develop a reasonable process and schedule for performing these reviews. As JAD 15 starts next week, the amount of design documentation outstanding for review will continue to increase.

Recommendation: 2023.05.001.R1 – Develop a process and reasonable schedule with adequate resources to revisit and review previously approved design deliverables from JAD 1 to JAD 12.

- Clarify and prioritize purpose, responsibilities, and expectations of project members in light of resource constraints.
- Consider sharing the workload with more DCCA project team members to assist with the workload and who will be involved in future CIR and user acceptance testing.
- Aalta conduct an independent review of deliverables based on best practices and JAD sessions, support DCCA's review process, and consider holding sessions with key SMEs to walkthrough/discuss design documentation.

2023.05.001.R2 – Develop a process for reviewing design documentation for current and future JAD sessions.

- Consider sharing the workload with more DCCA project team members to assist with the workload and who will be involved in future CIR and user acceptance testing.
- DCCA and Pacxa continue to work collaboratively during JAD sessions to actively give feedback, call out areas of complexity, and clearly work through business scenarios.
- Aalta should conduct an independent review of deliverables and continuously look for ways to facilitate and improve the deliverable review process. Aalta's deliverable review checklists should check the quality of Pacxa's deliverables against predefined standards, criteria, requirements, DCCA business rules, and other best practices.

IV&V ASSESSMENT AREAS

People

Process

Technology

OBSERVATION#: 2023.05.002

STATUS: N/A

TYPE: PRELIMINARY

SEVERITY: N/A

TITLE: NEED FOR FORMAL GOVERNANCE STRUCTURE

Observation: Additional information is needed regarding establishing an effective governance structure for DCCA's single-org Salesforce architecture.

Industry Standards and Best Practices: ISO/IEC/IEEE 12207:2017 and 15288:2023 recommends formalizing the architecture governance approach and defining governance roles and responsibilities related to design, quality, security, and safety. Salesforce best practices also emphasize the importance of good governance principles that provide a clear and consistent framework to manage change over time and define processes to resolve conflicting requirements.

Analysis: DCCA has requested for Pacxa to assess the impact of migrating the new BRM solution's configuration and customization into DCCA's main Salesforce organization in order to comply with the requirement of having the solution in a FedRAMP-certified environment and to reduce future costs by consolidating organizations. Pacxa is currently performing a Discovery session of DCCA's existing Salesforce architecture to understand how all the data, functionalities, business processes, and applications are organized within DCCA's main Salesforce instance.

An effective governance model is important to provide proper oversight and management of DCCA's business structure, priorities, IT roadmap, and practices such as production releases. If DCCA decides to move the BRM application into a single Salesforce instance, a formalized governance structure will be key to managing product development, priorities, maintain clear roles and responsibilities, and define the interfaces and interactions between system elements and external entities. This is especially important considering there will be two different vendors responsible for the operations and maintenance of the separate applications.

Pacxa's Discovery session and assessment report should provide more insight into the configuration, data model, and code which require an effective governance model. IV&V will continue to monitor this preliminary concern as additional information is discovered and pending technical decisions are made.

Recommendation: N/A for preliminary concerns.

Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

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

TERMS

RISK

An event that has not happened yet.

ISSUE

An event that is already occurring or has already happened.

Criticality Rating

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





















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

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

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



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



Severity Rating

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

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

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



SEVERITY 1: High/Critical level



SEVERITY 2: Moderate level



SEVERITY 3: Low level

Celebrates high performance or project successes.

TERMS

POSITIVE

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 Observations Log



Appendix C: Observations and Recommendations Log

SSESSMENT	OBSERVATION		ORIGINAL	CURRENT							
REA	3022 02 004	TYPE	SEVERITY	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS 2023 03 001 R1 Strategie phologo regarding quetom grabitecture and decign		STATUS UPDATE 04/20/22: DCCA and Beave are reviewing different entires for the everall	CLOSED DATE	CLOSURE REASON
teA	2023.03.001	Risk	High	High	OBSERVATION Uncertainty regarding the solution capabilities, architecture, and design could lead to corrective actions and impact project planning, costs, and schedule.	A lack of clarity around the platform and architecture decisions made at the beginning of the project, and the impacts of the outstanding technical questions is resulting in lack of confidence that the stakeholders have a full understanding of the systems, requirements, and integrations. A requirement of the solution was that the solution be hosted by a "FedRAMP Certified" Cloud Service Provider. Pacxa is in discussions with Clariti as they are not confident that the right licenses were procured. DocuSign does not support all the required, critical features required by DCCA and will require implementation of other tools or other workaround solutions. Pacxa identified the need for more data storage in Salesforce to continue with their migration activities. There is no documentation available for the validation and logic embedded within DCCA's current Kofax scanners, so Pacxa must reverse engineer and confirm user requirements. The Architecture and Technical Design deliverable is not scheduled to be delivered until November 2023, which is only one month prior to the planned Go-live date of December 2023. In light of recent concerns, DCCA has requested that this deliverable be provided earlier; however, a completion date is still pending. It is crucial for DCCA and Pacxa to work closely together on an overall solution. The project schedule will need to reflect the path forward and any corrective actions and rework which may impact project resources, costs,	2023.03.001.R1 – Strategic choices regarding system architecture and design should be revisited. - Perform a thorough review and tracking of technical requirements to identify all major gaps. Assign risk/criticality ratings for each identified gap. - Evaluate how each option addresses all major gaps. - Consider impacts to current phase as well as total solution/project; short-term costs and total cost of ownership (TCO); and impacts to the implementation plan and users. 2023.03.001.R2 – Review and agree on solution architecture and design. - Conduct a thorough review of the Architecture and Technical Design to ensure mutual understanding. 2023.03.001.R3 – Formally document the technology decisions and follow the project's established change management process. - Formally document the decision. Consider using Aalta's proposed Decision Analysis and Resolution (DAR) Process to analyze and document the pending technology options. - Follow the project's approved Change Management Plan to fully assess, document, and approve the change. - Document plans to address and mitigate the known impacts, gaps, and risks with the selected option	Open	STATUS UPDATE Od/30/23: DCCA and Pacxa are reviewing different options for the overall solution architecture and design, including options to meet the FedRAMP cloud requirement. The decision is expected in May. We added two additional recommendations, 2023.03.001.R3 and 2023.03.001.R4, to document the technology decisions, follow the project's established change management process, and conduct a lessons learned meeting. 05/31/23: Pacxa completed 60% of their Discovery session to determine the impacts of a single-org Salesforce architecture and other technical decisions on the timeline, costs, resources, and other project activities. The Discovery session is delayed as Pacxa waits for additional administrative access and separate environment to complete the remaining analysis. Pacxa needs to complete their Discovery session as part of the change management process. Aalta requested that key DCCA members document their evaluation of the technology options using the Decision Analysis and Resolution (DAR) Process and this is targeted for completion in June. Accuity will continue to update and monitor the decision-making, change management, and lessons learned process.	DATE DATE	DELOSURE REASON
						and schedule.	improvement and avoid past project challenges.				
rocess	2023.02.001	Fisk	Moderate	Moderate	Current risk management processes aren't communicating risks or executing risk mitigating tasks early enough which may impact project scope, schedule, and costs.	The lack of adequate communication around risks and potential changes, could result in unanticipated consequences. IV&V has observed many instances where delays and risks are not proactively communicated. For example, although risks are discussed at weekly status meetings; the risk regarding adequate data storage was not communicated for three weeks after initial discovery. Also, the project was not made aware that 25 out of 111 (23%) user stories tagged for Sprint 2 were at risk of not being completed until after the Sprint was completed. Although IV&V has observed some initial improvement in recent meetings and the earlier communication of technology uncertainties and exploration of alternatives, it is imperative to foster an open, transparent culture where the discussion of risks and issues is expected and encouraged.	2023.02.001.R1 – Foster an open, transparent culture where it is safe and comfortable to discuss risks. • Foster a culture of having candid dialogue, discussing potential risks, asking difficult questions, and holding each other accountable. 2023.02.001.R2 – In instances where changes are unavoidable, the project team should initiate change management processes early. Risks, costs, schedule, and quality impacts should be assessed and clearly communicated.		03/31/23: Strong risk management is required as the project continues to be confronted by technology challenges, unanticipated changes, and delays. Additional focus on identifying root causes of risks and challenges, and executing mitigation plans timely will help reduce ongoing concerns. 04/30/23: Accuity observed more active discussion and logging of project risks; however, improvement still needs to be made in the development of risk mitigation strategies, change management processes, communication of risks by all stakeholders, and accountability. As the project direction shifts and multiple workstreams reassess their tasks and responsibilities, it is paramount that risks continue to be discussed openly and timely. 05/31/23: Project risks and mitigation plans should be actively discussed during this period of transition and replanning. As the project's Discovery phase is prolonged, it is critical that the team promote a healthy culture of transparency to support the active identification of risks and development of risk mitigation plans. Accuity will continue to monitor the risk management process.		
rocess	2023.02.002	Risk	N/A	High	Untimely and insufficient completion of project management responsibilities may impact effective project execution.	Aalta was contracted to provide various project, oversight, risk, and quality management services to DCA. Aalta's deliverables were defined; however, many key deliverables are still pending including the criticality and risk assessment (CARA) report, interim User Acceptance Testing (UAT) Plan, project success metrics, and performance work statement (PWS) dashboard. Although some preliminary drafts and demos have been provided, additional information is needed on how to implement those plans and processes to successfully execute upcoming project activities. Possible root causes or contributing factors are an aggressive project pace, the turnover and adequacy of project management resources, and project complexity. The Aalta Project Manager is collaborative and a team player; however, may not have adequate time to perform all of the required project management tasks. DCCA and Aalta will need to work together to establish appropriate project management processes and clarify the priority of project management deliverables and activities.	Recommendation: 2023.02.002.R1 - Clarify roles and expectations of DCCA PM - Clarify and prioritize purpose and expectations of project manager contracted services in light of project risks and lessons learned 2023.02.002.R2 - Develop a project schedule to manage Aalta tasks and deliverables - Provide the appropriate detail of tasks, durations, due dates, milestones, and deliverables. - Consider either developing a separate schedule or incorporating into Pacxa's project schedule.		03/31/23: This was originally reported in the February 2023 IV&V Monthly Report as a preliminary concern but is upgraded to a risk in the March 2023 report. IV&V has observed improvement in some project management activities and support provided by other Aalta team members. Aalta's deliverables have been defined; however, many key deliverables according to their Project Management Plan v1.2, contract, and proposal are still pending. Clarification of the DCCA PM's responsibilities and expectations, as well as a project schedule for PM activities, are needed. 04/30/23: Accuity increased the severity rating from Level 2 (Moderate) to Level 1 (High). More rigor on foundational project management practices is needed to get the project back on track and prevent further delays and costs. Aalta has made progress on some pending deliverables, and they are working with the DCCA Project Sponsor to clarify expectations. As DCCA's PM, it will be important for Aalta to actively oversee project changes and ensure proper replanning, monitoring, controlling, and execution of project activities.		

ESSMENT OBSERVATION	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
								05/31/23: Aalta's progress on outstanding responsibilities is still unclear. More active project management support is needed to optimize project resources, reduce project stress for employees, communicate expectations, and improve resource planning for project activities. A formalized approach and process for adequately reviewing and approving project deliverables such as design documentation is also needed (2023.05.001). Accuity will continue to monitor the execution of project management responsibilities.		
2023.01.001	Risk	N/A	High	The DCCA PM's delay in developing processes to trace, test, and approve requirements may impact the ability to ensure the overall BRM solution fuffills all requirements and expectations.	preliminary concern but is upgraded to a risk in this report. Since our initial preliminary observation, Pacxa provided access to the Azure DevOps (ADO) tool used for requirements traceability and scheduled training on the tool in early March 2023. The tool includes acceptance criteria, test cases, defect tracking, and reporting and dashboard capabilities. Per contract requirements, the Aalta PM is responsible for working with DCCA to develop objective and measurable standards that are traceable to	review and accept project requirements and deliverables. - Define roles and responsibilities of project team members to eliminate duplication of efforts or process gaps. - Streamline the use of tools and clearly define the steps to ensure requirements satisfaction. - Communicate DCCA PM and SME roles and responsibilities for reviewing the fulfillment of requirements after JAD Sessions and Sprint Demonstrations. 2023.01.001.R2 – Develop clear traceability and understanding of all contract requirements. - The DCCA and Aalta PMs should reference and track all contractual requirements and vendor responsibilities contained within the Request for	Open	02/28/23: This was originally reported in the January 2023 IV&V Monthly Report as a preliminary concern but is upgraded to a risk in the February 2023 report. 03/31/23: Aalta provided a high-level walkthrough of the Smartsheets tool showing how Pacxa's contract requirements will be tracked. The Smartsheets tool is still being refined and access is still pending. Furthermore, a process for traceability and validation against the requirements traceability matrix (RTM) is also being developed. For deliverable tracking, Deliverable Review Checklists are still pending for Pacxa deliverables. 04/30/23: Accuity increased the severity rating from Level 2 (Moderate) to Level 1 (High). As the FedRAMP cloud requirement gap should have been caught earlier, the importance of timely and active tracing of requirements is an important lesson learned for this project. The process to trace, test, and approve requirements is still pending. 05/31/23: IV&V and the project managers brainstormed ways to trace, test, and approve requirements. A formalized requirements management process is still urgently needed. Accuity will continue to update and monitor the requirements management process.		

ASSESSMENT OBSER	ERVATION		ORIGINAL	CURRENT							
AREA ID		TYPE	SEVERITY	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Technology 2023.0	8.01.002	Risk	Moderate	Moderate	Multiple outstanding data conversion items are preventing the timely execution of data activities which may have impacts on the project schedule.	There are multiple phases and iterations of Data and Document Conversion happening concurrently. Although good progress has been made in some areas, there are a number of outstanding items that were planned to begin already, that are delayed such as: - HBE Portal to Clariti: The project planned on receiving the database extract at the end of December 2022; however, due to reliance on a third-party vendor, the data is expected to be delivered in February 2023. (Risk ID #9.00; Action Item #117) - RDPMS to DocuSign CLM Instance: The project planned on starting the migration of documents in January 2023. There is a currently a limitation with the bulk import process, and alternative bulk upload approaches need to be investigated with DocuSign, if available. (Action Item #114) - Migration of Documents from Old DocuSign Instance to New DocuSign CLM Instance: The project must find a mechanism to migrate over the documents to the new instance; however, the responsibility for the migration is still unclear. Furthermore, the project needs to create procedures to have the documents reorganized so that it is consumable by the new system. Additional meetings are being scheduled with DocuSign to resolve this matter. (Risk ID #2.00; Action Item #115 and #116) Status and steps to address the open data conversion issues are tracked in the RAID Log as open risks and actions.			02/28/23: Some data conversion activities are progressing; however, there are continued delays due to the reliance on third-party vendors and other pending decisions. 03/31/23: Progress continues to be made for the various data conversion phases; however, they are behind schedule. The largest risk remains with the RDPMS to DocuSign Conversion. There is a currently a DocuSign limitation with the bulk import process, and alternative bulk upload approaches are being investigated and developed. Pacxa needs to develop an approach to test that all documents are uploading to DocuSign in the correct folder with the proper metadata. An approach to address how previously scanned documents can be converted to consumable format for the new Clariti solution is still pending. 04/30/23 and 05/31/23: Limited progress continues to be made for the various data conversion phases. Some phases and activities are dependent on storage and other technical decisions. Accuity will continue to update and monitor data conversion activities and the impact of ongoing delays.		
Process 2022.0	2.09.001	Risk	Low	High	Current project delays may impact the overall project timeline.	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.			10/31/22: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). Completion of the Planning and Discovery stages is one month behind what was originally planned. The estimated completion date was initially extended two weeks in September 2022, extended another week in October 2022, and then extended again at the end of October. The delays are due to the pending completion and acceptance of project management plans, the detailed project schedule, and the RTM but it is unclear what the root cause of these ongoing delays are. The trend of repeated revised due dates needs to be further investigated and addressed. 11/30/22: The baseline project schedule was developed and is currently under DCCA review. This schedule will be used to monitor progress going forward. As additional tasks are to be added, actual dates and progress percentages tracked, and the schedule is not resource loaded, we will continue to assess its effectiveness in managing the project. 12/31/22: The baseline project schedule was approved; however, there are some delayed tasks. Additional improvements are needed to more closely monitor the schedule and project progress. 01/31/23: There are some delayed technology activities that may impact future JAD sessions and the overall timeline if not addressed in the upcoming weeks. These delays are being tracked on the RAID Log. 02/28/23 and 03/31/23: Accuity increased the severity rating from Level 2 (Moderate) to Level 1 (High). It is unclear if ongoing schedule delays will impact the overalt timeline. Additionally, key pending decisions and technical issues could significantly impact the ability to meet the aggressive December 2023 Go-Live date. 04/30/23 and 05/31/23: The change in architecture and design will push back the December 2023 Go-Live date. The project schedule will be re-baselined upon making key technical decisions. Some project deliverables and activities are on hold, delayed, or will need to be updated based on the technology direction selected.		

ASSESSMENT	OBSERVATION		ORIGINAL	CURRENT							
AREA	ID DESERVATION	TYPE	SEVERITY	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
People	2022.08.002	Risk	Low	High	Insufficient DCCA project resources may	It is unclear at this time if there are adequate DCCA project resources to	2022.08.002.R1 – Evaluate project resource needs and acquire additional	Open	09/30/22: DCCA is still in the process of identifying resources to		
•				_	lead to project delays, reduced project	efficiently perform project work to achieve the aggressive high-level	resources.		assign to lead roles and brainstorming different resource management		
					performance, or turnover of project	timeline. DCCA did contract an external full-time Project Manager (Aalta)	Estimate resource time requirements and identify required knowledge or		strategies (e.g., staging resources for different phases). DCCA also plans to hire		
					resources.	who officially onboarded at the end of August 2022. Having a dedicated	skillsets.		additional employees in 2023 to mitigate the impact to operations.		
						and experienced resource in the Project Manager role has been shown to	Develop a plan to minimize the impact to operations (e.g., backfill, reassign				
						increase project success compared to a resource who is often pulled back to	work) so that assigned project resources are not pulled back from project work.		10/31/22: DCCA workstream lead roles were identified but the same resources		
						perform regular job duties. DCCA also appointed resources for the OCM	Get commitments from resources and management for the time needed to		were assigned to multiple roles. Additional resources are still needed.		
						and communications lead roles; however, other project roles and resources	perform project work.		Additionally, many DCCA SMEs attend each of the ongoing Joint Application		
						are not yet identified. The new DCCA Project Manager is working to			Design (JAD) sessions. As sprint meetings and demos will begin to run in		
						identify the additional DCCA workstream lead roles (e.g., data conversion	2022.08.002.R2 - Provide adequate training and support to assigned resources		parallel with the JAD sessions, DCCA needs to ensure that there will be		
						lead, testing lead) needed to efficiently and effectively perform project work	to be able to perform role.		adequate resources and that resources are not overbooked. We added an		
						as well as identify potential candidates within DCCA to fill these lead roles.	Consider performing general project management training so that resources		additional recommendation at 2022.08.002.R3 to use resource management		
						A common issue in SOH modernization projects is that assigned resources	understand general project processes and the purpose of project activities.		strategies to optimize the utilization of limited DCCA project resources.		
						must often balance competing priorities of project work and ongoing	Consider providing additional support and information to resources regarding				
						operational work. Additionally, assigned resources don't always have the	best practices and common approaches for assigned tasks or areas of	1	11/30/22: DCCA plans to reassess resource needs once project activities begin		
				1		necessary experience or knowledge of how to perform the project tasks. It	responsibility.		to run in parallel. We will continue to assess the risk of inadequate resources		
						is critical that a resource plan to backfill and train DCCA resources is		1	once development sprints begin in December 2022 and when timing of the soft		
						developed to prevent project delays.	2022.08.002.R3 - Develop a plan and processes to optimize utilization of DCCA project resources.		UAT cycles is determined.		
							Ensure that only the necessary resources are attending each of the various		12/31/22: Project team members are generally able to keep up with current		
							Build and Validation stage sessions.		project activities. Additional project activities involving DCCA team members		
							Plan out resources assigned to the various sessions that will be running in parallel to ensure there will be adequate resources and that resources are not		will begin to run in parallel with development Sprint 1 in January 2023.		
							overbooked.		01/31/23: Project managers are working closely together and developed an		
									approach to proactively communicate project activities and better facilitate the		
									coordination of DCCA project resources. With growing technology delays, it is		
									important to clarify technical lead roles to ensure tasks are assigned and		
									completed timely (See 2023.01.002).		
									02/28/23: Progress continues to be made in many project workstreams, but		
									stronger task management, communication, and coordination of resources may		
									help facilitate the completion of action items and ongoing delays.		
									03/31/23: Accuity increased the severity rating from Level 3 (Low) to Level 2		
									(Moderate). The Client Interim Review and JAD 13 sessions are going to occur		
								1	simultaneously in May. IV&V has raised the concern regarding resource		
									constraints during this period, but the PMs feel confident that the DCCA		
									resources will be adequate to perform these tasks at the same time. A schedule		
									and resource plan for the Client Interim Review including assigned test scripts is		
									still pending.		
									04/30/23: Proper resource management planning is still a need. The impact of		
									the pending technical decisions on resources should be carefully assessed,		
									including the need for a revised resource management plan.		
									05/31/23: Accuity increased the severity rating from Level 2 (Moderate) to Level		
									1 (High). With the need to revisit and review JAD 1 to JAD 12 design		
								1	documents, and stay current with reviewing current JAD sessions, a clearly		
									defined process and reasonable schedule is needed to support project staff		
									given their heavy workloads (2023.05.001).		
									Accuity will continue to assess the adequacy and management of project		
									resources.		
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ASSESSMENT	OBSERVATION		ORIGINAL	CURRENT							
AREA	ID	TYPE	SEVERITY	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2022.08.006	Pisk	Low	Moderate	A lack of quantitative success metrics may	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.	2022.08.006.R1 – Formalize measurable goals and success metrics. - Consider financial, nonfinancial, tangible, and intangible metrics such as operational key performance indicators (KPIs), customer or employee satisfaction, user adoption, return on investment, or cycle or processing times. - Consider benefits realization management objectives as well as alignment to BREG goals. 2022.08.006.R2 – Collect baseline data and monitor progress. - Consider methods for collecting data such as process mining, surveys, queries, observation, or open forums. - Consider sources of data such as legacy systems, operations, and internal and external stakeholders.	Open	09/30/22: The Project will work to define KPIs and success metrics. 10/31/22, 11/30/22, 12/31/22, and 1/31/23: No updates to report. 02/28/23: Accuity increased the severity rating from Level 3 (Low) to Level 2 (Moderate). Project success metrics are delayed and may lead to differences in the interpretation of project success. The DCCA PM plans to finalize the metrics in March 2023. 03/31/23: Project success metrics are still not defined and an updated target date is not available. 04/30/23: Project success metrics are under development and expected in May 2023. 05/31/23: Draft project success metrics were provided in May and are being updated to reflect comments received. A target date for finalization is unknown. Accuity has provided comments to the draft metrics and will monitor progress against them once finalized.		CLOSORE REASON
Process	2022.11.001	Risk	Moderate	Moderate	Unclear project deliverables and schedule for the contracted DCCA project manager could impact the execution of Aalta and DCCA's project management responsibilities and activities.	In August 2022, DCCA contracted Aalta to provide project management services for the BRM Project. Aalta's proposal provides the details of their approach for performing the high-level scope of work outlined in their contract. The following is a summary of IV&V observations regarding the Aalta contract: - A number of reports, activities, and work products were discussed in Aalta's methodology as described in their proposal; however, it is unclear if these are to be performed. - Based on the description of the activities and work products from Aalta's proposal, it seems that some of these tasks would have been already performed as a part of the planning stage. - A project schedule of Aalta tasks (e.g., reports, work products, deliverables) is pending. - Some of Aalta's scope of work and deliverables overlap with Pacxa's contract (e.g., organizational change management plan, training plan). - In the first three months of Aalta's contract, Aalta's lead project manager changed three times which may have contributed to the delayed execution of tasks. A clear understanding of the Aalta's scope of work, approach, and timeline is necessary to ensure a smooth execution of project management activities fo optimal team and project performance.	Consider either developing a separate schedule or incorporating into Pacxa's project schedule.		12/31/22: Accuity decreased the severity rating from Level 2 (Moderate) to Level 3 (Low) as Aalta clarified and delivered some of their contract deliverables including monthly reports, project management plan, and quality assurance surveillance plan. Additional clarification of Aalta's contract requirements and deliverables is needed. 01/31/23: Aalta confirmed their contract deliverables. A timeline and schedule for open deliverables is still pending. 02/28/23: Accuity increased the severity rating from Level 3 (Low) to Moderate as many key PM deliverables are still pending including the criticality and risk assessment (CARA) report, interim User Acceptance Testing (UAT) Plan, project success metrics, and performance work statement (PWS) dashboard. Although some preliminary drafts and demos have been provided, additional information is needed on how to implement those plans and processes to successfully execute upcoming project activities (see preliminary concern 2023.02.002). 03/31/23: Although the UAT Plan is still high level, Aalta held several meetings to walk through UAT responsibilities still high level, Aalta very walk through of the PWS dashboard was provided showing how Pacxa's contract requirements will be tracked.	03/31/23	Closed as Aalta's project deliverables were defined. The recommendation to provide schedule information for Aalta's tasks was incorporated into observation 2023.02.002.
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.		09/30/22: DCCA is still in the process of formalizing steering committee members and documenting the governance model. 10/31/22: The steering committee members were selected and the first meeting is expected to be scheduled in November 2022. Committee meetings should commence soon to ensure there is adequate guidance, support, and oversight of the project. 11/30/22: The project governance model was established and the first executive steering committee (ESC) meeting was held.	11/30/22	Closed as the governance model was established.

ASSESSMENT	OBSERVATION		ORIGINAL	CURRENT							
AREA	ID	TYPE	SEVERITY	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2022.08.004	Risk	Low	Low	A lack of cost management practices may lead to unexpected or improper costs.	how the complete project budget will be managed and how additional costs outside of the major contracts will be identified. For example, certain	long-term operational costs (e.g., licenses, subscriptions, maintenance, cloud	Closed	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). 10/31/22: Processes for monitoring contract costs and tracking a comprehensive project budget still need to be formalized. 11/30/22: The additional procurement for licensing was completed. Other costs related to a conversion tool for proprietary format files and the project management tool will be covered by Pacxa's contract and are not additional project costs. The contracted DCCA project manager will identify potential project costs and will be responsible for monitoring Pacxa contract deliverables for milestone payments.	11/30/22	Closed as sufficient cost management processes are in place.
Process	2022.08.007	Risk	Prelim	Moderate	Key technical decisions are pending and may impact the project schedule and costs (Updated).	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). 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.		Closed	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. 10/31/22: Progress was made on key technical decisions but final resolution is still pending. 11/30/22: Key technical decisions were made regarding the system architecture of the DocuSign and Salesforce orgs. Decisions were also made regarding data conversion (e.g., conversion tool, NIC) allowing data conversion planning activities to move forward.		Closed as key decisions were made. Although this risk was addressed, the execution and implementation of the decisions will continue to be monitored for impact to the project. Additionally, as the speed of execution to make these decisions could be improved, we will continue to evaluate schedule management processes in observation 2022.08.002.
People	2022.08.001	Positive	N/A	N/A	The project team environment between Pacxa and DCCA is collaborative and 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	09/30/22	Closed as this is a positive observation.
Process	2022.08.005	Opportunity	N/A	N/A	Implementation of recurring meetings 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.	, , , , , , , , , , , , , , , , , , ,	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.	09/30/22	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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