

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES

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

November 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, Hawai'i 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 http://ets.hawaii.gov (see "Reports").

Sincerely,

Douglas Murdock (Nov 28, 2022 08:26 HST)

Douglas Murdock Chief Information Officer State of Hawai'i

Attachment



MONTHLY IV&V REVIEW REPORT

October 31, 2022 | Version 1.0





Table of Contents



EXECUTIVE SUMMARY

Background	3
IV&V Dashboard	4
IV&V Summary	5
Appendix A: IV&V Criticality and Severity Ratings	7
Appendix B: Industry Standards and Best Practices	9
Appendix C: Prior Observations Log	12
Appendix D: Comment Log on Draft Report	15



Document History

DATE	DESCRIPTION	AUTHOR	VERSION
11/10/22	Monthly IV&V Review Report Draft created	Sondra Ouye	0.0
11/21/22	Monthly IV&V Review Report Final updated to reflect no comments submitted in Appendix D.	Sondra 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 Process and the beginning of a two-month assessment of People.

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 October 31, 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

"For every minute spent in **organizing**, an hour is earned."

- Benjamin Franklin



PROJECT ASSESSMENT

OCTOBER 2022

SUMMARY RATINGS

OVERALL RATING



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

PFOPLE



PROCESS



TECHNOLOGY



CRITICALITY RATINGS



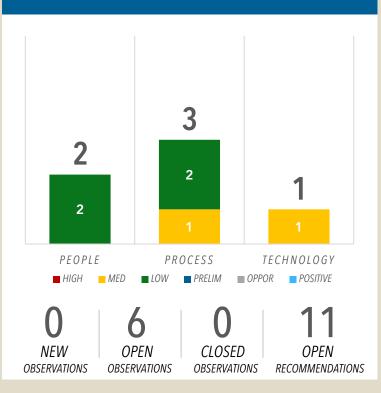








IV&V OBSERVATIONS



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

** Detailed project schedule to be prepared in the Planning stage.



- Completion of the Planning and Discovery stages is one month behind what was originally planned. It is unclear if these delays will impact the overall timeline and how these delays will be prevented going forward.
- Foundational project processes need to be implemented or improved to support continued project success.
- The Build and Validate stage kicked off with an informative orientation. Discussions and refinement of requirements are effectively facilitated in the ongoing JAD sessions.
- Progress was made on key technical decisions but timely resolution is needed to minimize impacts.



OCTOBER 2022 · BRM PROJECT

AUG	SEP	ОСТ	IV&V ASSESSMENT AREA	IV&V SUMMARY
G	G	1	Overall	The Build and Validate stage is underway but the Planning and Discovery activities are further delayed. Foundational project processes need to be implemented or improved to support project success.
				Project Schedule: Completion of the Planning and Discovery stages is one month behind what was originally planned. It is unclear how these delays will impact the overall timeline (2022.09.001) as the detailed project schedule is still pending.
				Project Costs: Invoices to-date are within total contract costs. Additional project costs for licensing are still being evaluated (2022.08.007).
				Quality: The quality management plan is a project deliverable that will be completed in the Planning stage.
				Project Success: Project goals were drafted; however, quantitative success metrics need to be defined (2022.08.006).
G	G	6	People Team, Stakeholders, & Culture	 DCCA workstream lead roles were identified but the same resources were assigned to multiple roles. Additional resources are needed to serve in lead roles and all leads should receive adequate training to prepare them for their assigned roles (2022.08.002). Many DCCA SMEs attend each of the ongoing Joint Application Design (JAD) sessions. As sprint meetings and demos will begin to run in parallel with the JAD sessions, DCCA needs to ensure that there will be adequate resources and that resources are not overbooked. Resource management strategies are needed to optimize the utilization of limited DCCA project resources (2022.08.002). 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 (2022.08.003). DCCA's contracted project management resources have rotated requiring additional time for transition and getting up to speed. DCCA SMEs continue to be engaged during the JAD sessions. Pacxa leads are excellent at facilitating JAD discussions. The organizational change management (OCM) plans continue to be developed to engage and support stakeholders.

OCTOBER 2022 · BRM PROJECT

AUG	SEP	ОСТ	IV&V ASSESSMENT AREA	IV&V SUMMARY
G	G		Process Approach & Execution	 Drafts of the project management plan and four of the sub-plans were provided and are pending DCCA review and approval. Five additional sub-plans and the detailed project schedule are still in progress. DCCA approval of the requirements traceability matrix (RTM) Discovery stage deliverable is also pending. The Planning and Discovery stages are one month behind what was originally planned due to the pending deliverables. Improvements to schedule management processes are needed to identify the root cause of delays and to better detect and prevent delays going forward (2022.09.001). Additional recurring meetings were implemented for technical discussions, data conversion activities, and OCM working sessions which supports greater collaboration between the DCCA and Pacxa leads. The JAD orientation provided an overview of the development methodology and approach. Additional discussions regarding cost management processes as well as further identification of other project costs (e.g., software licenses, project tools) are still needed (2022.08.004). Quantitative success metrics need to be defined (2022.08.006).
G	•	•	Technology System, Data, & Security	 Progress was made on key technical decisions but final resolution is still pending. The Project needs to timely make key decisions to minimize the potential impact and risk to the project (2022.08.007). The Build and Validate stage kicked off with JAD sessions. Wireframes are used to discuss and further refine requirements in the JAD sessions. Design documents will be updated based on the JAD discussions. Initial technical discussions were held regarding high-level architecture and security. The data conversion team is maintaining a running list of data conversion matters and working through each item to develop an action or resolution plan. The database schema analysis and data conversion plan continue to be developed.

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 (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



TERMS

POSITIVE

Celebrates high

performance or

PRELIMINARY CONCERN

Potential risk

requiring further analysis.

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		ORIGINAL	CURRENT							
AREA	ID	TYPE	SEVERITY	SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	
Process	2022.09.001	Risk	Low	Moderate	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.	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.	Open	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. Accuity will continue to evaluate schedule management practices.		
People	2022.08.002	Risk	Low	Low	insufficient DCCA project resources may lead to project delays, reduced project performance, or turnover of project resources.	It is unclear 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.	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.		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. 10/31/22: DCCA workstream lead roles were identified but the same resources were assigned to multiple roles. Additional resources are still needed. Additionally, many DCCA SMEs attend each of the ongoing Joint Application Design (JAD) sessions. As sprint meetings and demos will begin to run in parallel with the JAD sessions, DCCA needs to ensure that there will be adequate resources and that resources are not overbooked. We added an additional recommendation at 2022.08.002.R3 to use resource management strategies to optimize the utilization of limited DCCA project resources. Accuity will continue to assess the adequacy and management of project resources.		
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. 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. Accuity will evaluate the governance model once meetings commence.		
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 N&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). 10/31/22: Processes for monitoring contract costs and tracking a comprehensive project budget still need to be formalized. Accuity will continue to assess cost management practices.		

ASSESSMENT AREA Process	OBSERVATION ID 2022.08.006	TYPE Risk	ORIGINAL SEVERITY Low	CURRENT SEVERITY LOW	OBSERVATION A lack of quantitative success metrics may lead to differences in the interpretation of project success.	ANALYSIS 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.	RECOMMENDATIONS 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.	STATUS Open	9/30/22: The Project will work to define KPIs and success metrics. 10/31/22: No updates to report. Accuity will review selected metrics once selected.	CLOSED DATE	CLOSURE REASON
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, HIC). 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.	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. 10/31/22: Progress was made on key technical decisions but final resolution is still pending. Accuity will continue to monitor progress of key technical decisions.		
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.	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.	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				



FIRST HAWAIIAN CENTER

ACCUITY LLP

999 Bishop Street

Suite 1900

Honolulu, Hawaii 96813

- Р 808.531.3400
- ғ 808.531.3433

www.accuityllp.com



Accuity LLP is an independent member of Baker Tilly International. Baker Tilly International Limited is an English company. Baker Tilly International provides no professional services to clients. Each member firm is a separate and independent legal entity, and each describes itself as such. Accuity LLP is not Baker Tilly International's agent and does not have the authority to bind Baker Tilly International nor act on Baker Tilly International's behalf. None of Baker Tilly International, Accuity LLP, nor any of the other member firms of Baker Tilly International has any liability for each other's acts or omissions. The name Baker Tilly and its associated logo are used under license from Baker Tilly International Limited.

© 2022 Accuity LLP. This publication is protected under the copyright laws of the United States and other countries as an unpublished work. All rights reserved.