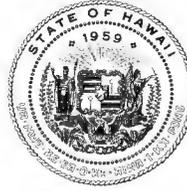


JOSH GREEN, M.D.
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March 6, 2024

The Honorable Ronald D. Kouchi
President of the Senate
and Members of the Senate
Thirty-Second State Legislature
State Capitol, Room 409
Honolulu, Hawai'i 96813

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

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

Pursuant to HRS section 27-43.6, which requires the Chief Information Officer to submit applicable independent verification and validation (IV&V) reports to the Legislature within ten days of receiving the report, please find attached the report the Office of Enterprise Technology Services received for the State of Hawai'i, Department of 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 (Mar 6, 2024 11:38 HST)

Douglas Murdock
Chief Information Officer
State of Hawai'i

Attachment



STATE OF HAWAII
DEPARTMENT OF COMMERCE AND CONSUMER AFFAIRS (DCCA)

Business Registration Modernization (BRM) Project

MONTHLY IV&V REVIEW REPORT

January 31, 2024 | Version 1.0



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Document History

DATE	DESCRIPTION	AUTHOR	VERSION
02/12/24	Monthly IV&V Review Report Draft created	Julia Okinaka	0.0
02/29/24	Monthly IV&V Review Report finalized. Comments and responses were included in Appendix D which resulted in updates throughout the report.	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. The project had a three-month pause to reassess the technology solution and design, and restarted on November 20, 2023.

Our initial assessment of project health was provided in the first Monthly IV&V Review Report as of August 31, 2022. IV&V's contract was extended to match the revised project timeline, and Monthly IV&V Review Reports will be issued through July 2024 to continually update and evaluate project progress and performance.

Our IV&V Assessment Areas include People, Process, and Technology. Each month we 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 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 January 31, 2024. Ratings are provided monthly for each IV&V Assessment Area (refer to Appendix A: IV&V Criticality and Severity Ratings). The overall rating is assigned based on the criticality ratings of the IV&V Assessment Categories and the severity ratings of the underlying observations.

TEAMWORK

"Alone we can do so little; TOGETHER we can DO SO MUCH."

- Hellen Keller

PROJECT ASSESSMENT

JANUARY 2024

SUMMARY RATINGS

OVERALL RATING



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

PEOPLE



PROCESS



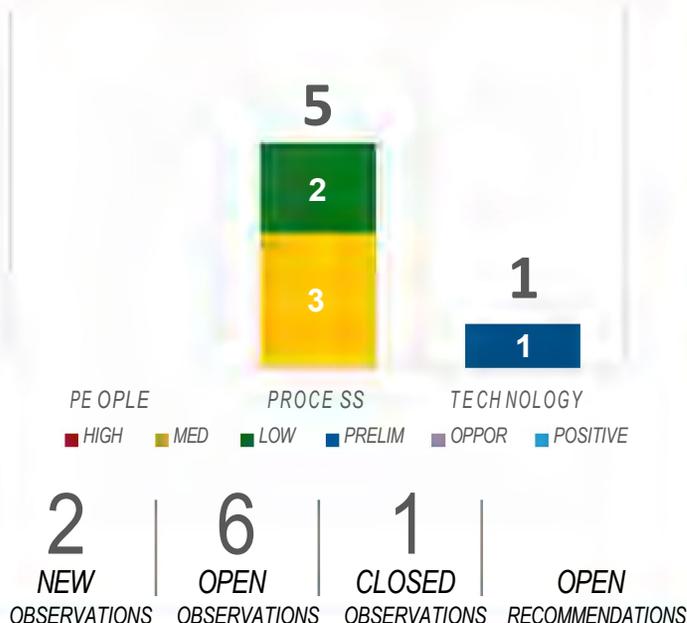
TECHNOLOGY



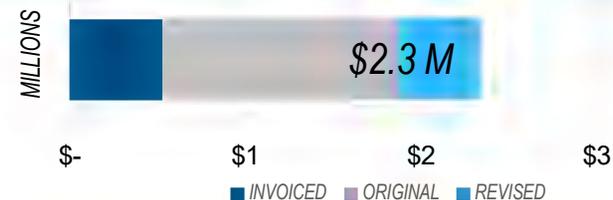
CRITICALITY RATINGS



IV&V OBSERVATIONS



PROJECT BUDGET



* Only includes contracts. IV&V unable to validate total budget.

PROJECT PROGRESS



** Incomplete project schedule (2024.01.001).

KEY PROGRESS & RISKS

- The rebaselined project timeline was approved with an aggressive Go-Live date of July 2024. The slow progress made in its first two sprints may pose challenges in meeting this deadline.
- The current high-level project schedule lacks sufficient detail to ensure that the project team has a comprehensive understanding of all project activities. A meeting to expand the schedule is being planned.
- Given the aggressive timeline and outstanding project tasks, strong risk management is needed to actively discuss and mitigate risks.



*** IV&V unable to validate the progress percentage of the schedule as it does not include all project activities.

			<p><i>Overall</i></p>	<p>The current high-level project schedule lacks sufficient detail to ensure that the project team has a comprehensive understanding of all project activities (2024.01.001). Furthermore, greater transparency around sprint planning and execution is needed considering the slow progress made during the project's first two sprints and need for increased sprint velocity (2024.02.002).</p> <p>Project Schedule: The project timeline was approved with a Go-Live date in July 2024; however, the current progress of the project may pose some challenges in meeting this deadline. While the project schedule lacks the necessary detail for effective planning and execution of all essential tasks, a meeting is planned in February to build it out with additional detail (2024.01.001).</p> <p>Project Costs: The project's budget increased by approximately \$450,000 for a total budget of \$2,321,889 including the technical solution, project management, and IV&V services. Contract invoices received to-date are within total contract costs.</p> <p>Quality: A quality management plan will be provided in February 2024.</p> <p>Project Success: The project needs to develop clear success metrics based on past experiences to ensure success (2022.08.006). Clearly defined metrics should be created to monitor the project's progress towards its goals and objectives.</p>
			<p><i>People</i> <i>Team, Stakeholders, & Culture</i></p>	<ul style="list-style-type: none"> • The project held a Steering Committee Meeting in January with representation from DCCA, Pacxa, and AST leadership. Continued active involvement by project sponsors is critical to project success. • Recurring functional design meetings commenced and DCCA stakeholders appear to be engaged. • Clearly communicated project management practices, effective execution of sprints, and detailed project schedules are needed to ensure that all project members are aligned and understand their tasks and responsibilities, which reduces confusion and enhances productivity. Clear and transparent project plans can also build trust and promote a positive team environment (2024.01.001 and 2024.01.002). • With less than 6 months remaining until Go-Live, multiple project workstreams will most likely occur simultaneously impacting resource planning and availability. • OCM meetings continued to be held regularly and the monthly project newsletter was distributed in January. OCM is working with DCCA to refine readiness checklists to prepare end users and stakeholders for the deployment of the new system.

R

NA

Y

Process
Approach & Execution

- Project is lacking rigorous schedule management practices which may impact the ability to properly manage resources, quality, and timeliness of project execution (2024.01.001).
- Unclear sprint planning and execution may result in misalignment of sprint goals and objectives, low quality work, and potential rework (2024.01.002). With Sprint 1 completed and Sprint 2 nearing completion, DCCA communicated concerns regarding the absence of sprint reviews and validation of work completed.
- Pacxa proposed skipping Sprint 3 from the total of 8 planned sprints to allow DCCA to have more involvement in sprint planning and requirements prioritization with future sprints (2024.01.002). It will be important to evaluate the tradeoffs of increasing sprint velocity within fewer sprints and maintaining the development and testing team's quality of work.
- In January, several project deliverables were provided. As some deliverables appear identical to the ones submitted in the original project phase, DCCA and Aalta should carefully review them to avoid previous project issues. Aalta did not complete formal deliverable review checklists on submitted deliverables (2023.02.002). Review of Pacxa deliverables using the comment log was not provided timely, and the deliverable review process is being reevaluated by DCCA and Aalta.
- Given the aggressive timeline and outstanding project tasks, strong risk management is needed to actively discuss and mitigate risks (2023.02.001).
- The Master Project Management Plan will be provided in early February 2024.
- The project success metrics should be defined as soon as possible. Establishing success metrics will enhance alignment with defined project goals and expectations (2022.08.006).

R

NA

Y

Technology
System, Data, & Security

- The new technology solution involves redeveloping the business registration Salesforce solution using DCCA's primary Salesforce organization and DocuSign instance.
- The project is holding regular functional design meetings to review and refine understanding of requirements in preparation for future sprints.
- The System Architecture and Design Documentation was provided. The deliverable may need refinement after additional functional design meetings and requirement sessions are completed.
- Data Conversion activities are delayed and tasks related to data extraction, cleansing, and validation need to be clarified.
- Pacxa conducted meetings to address questions regarding integrations with the payment processing system and other applications. Additional information will be needed regarding establishing an effective governance structure for DCCA's single-org Salesforce architecture (2023.05.002).
- The project identified a potential issue related to the solution's ability to provide address validation services and will provide an assessment and options for DCCA's consideration.*

* Accuity is not reporting individual risks as formal IV&V observations as they are already being appropriately tracked and monitored by the project team. The rating for this IV&V Assessment Area reflects the cumulative risks.

IV&V ASSESSMENT
AREAS

People

Process

Technology

OBSERVATION #: 2024.01.001

STATUS: OPEN

TYPE: RISK

SEVERITY:

2

TITLE: LACK OF RIGOROUS SCHEDULE MANAGEMENT PRACTICES

Observation: Project is lacking rigorous schedule management practices which may impact the ability to properly manage resources, quality, and timeliness of project execution.

Industry Standards and Best Practices: PMI PMBOK provides best practices in schedule management for project managers. It recommends developing a project schedule using techniques such as Work Breakdown Structure (WBS), network diagramming, critical path analysis, and resource leveling.

Analysis: The current high-level project schedule lacks sufficient detail to ensure that the project team has a comprehensive understanding of all project activities, and the project managers can better estimate the time and resources required for each task. Given that there are less than six months before system deployment and the project is experiencing some delays, it is vital that a detailed work breakdown structure (WBS) of the project scope and requirements is broken down into smaller, components that can be easily scheduled and tracked. For example, the current schedule is too high-level. It is unclear who is performing key critical project activities related to data extraction, cleansing, conversion, and validation. Based on ongoing discussions, a meeting is planned in February to build the schedule out with additional detail.

Recommendations: 2024.01.001.R1 – Improve the project schedule by creating a WBS broken down into smaller, more manageable components.

- Provide the appropriate detail of tasks, durations, due dates, milestones, and key work products. Both DCCA- and Pacxa-assigned tasks and resources should be clearly reflected in the project schedule, including data validation and user acceptance testing.
- Obtain agreement on the baseline schedule and then hold parties accountable for tasks and deadlines.

2024.01.001.R2 – Assess the need for additional Pacxa resources for project management support.

- The current Pacxa project manager is actively facilitating functional design sessions and other key activities, which may impact his ability to focus on project management execution.

IV&V ASSESSMENT AREAS

People

Process

Technology

OBSERVATION #: 2024.01.002

STATUS: OPEN

TYPE: ISSUE

SEVERITY:

2

TITLE: UNCLEAR SPRINT PLANNING AND EXECUTION

Observation: Unclear sprint planning and execution may result in misalignment of sprint goals and objectives, low quality of work, and potential rework.

Industry Standards and Best Practices: The Scrum framework is commonly used for sprint planning and execution¹ in agile software development. In addition to the framework, the Agile Manifesto and Agile principles also provides a set of guidelines and best practices for managing and prioritizing work, conducting daily stand-up meetings, and holding sprint review and retrospective meetings.

Analysis: The project executed Sprints 1 and 2 without providing a clear understanding of sprint goals. Pacxa provided a preliminary report showing 13 items completed, 10 items in progress, 4 to be started and 1 blocked item. For the first two sprints, the team did not review the product backlog, discuss priorities and dependencies, or agree upon the sprint goal. As a result, there is not a clearly defined sprint goal, a prioritized and refined backlog, a clear understanding of the total number of development items, or a detailed plan for the remaining sprints. Furthermore, the project did not hold a sprint review meeting to demonstrate the work completed, share testing or quality assurance results, or hold a retrospective to reflect on ways to improve future sprints.

For future Sprints, Pacxa will work more closely with DCCA stakeholders for greater transparency and collaboration. Meetings have been scheduled to refine requirements, review acceptance criteria, and prioritize the backlog. Pacxa is proposing skipping Sprint 3 from the total of 8 planned sprints to allow for more sprint planning starting with Sprint 4, allowing DCCA to have more involvement in the requirements prioritization and a shared understanding among the team of the work to be completed. It will be important to evaluate the tradeoffs of increasing sprint velocity within fewer sprints and maintaining the development and testing team's quality of work.

Recommendations: 2024.01.002.R1 – Implement Agile ceremonies and reporting for greater transparency

- Implement Agile ceremonies such as daily stand-ups, sprint planning, sprint review, and retrospective meetings. These meetings will help to promote transparency and communication among team members and ensure that everyone is aligned with the goals and objectives of the sprint.
- Provide more sprint reporting such as burn-down charts, velocity, and test summary reports.

2024.01.002.R2 – Evaluate if the remaining number of sprints is realistic and achievable.

- Consider if the number of backlog items left to complete, the team's velocity, the complexity of the remaining items, any dependencies, and any external factors could impact the team's ability to complete the work in the number of remaining sprints.

Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

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

Criticality Rating

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.

TERMS

RISK
An event that has not happened yet.

ISSUE
An event that is already occurring or has already happened.



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



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



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



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

TERMS

POSITIVE
Celebrates high performance or project successes.

PRELIMINARY CONCERN
Potential risk requiring further analysis.

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

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: Prior Observations Log

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2023.12.001	Prelim	N/A	N/A	Slow project restart may impact the timeliness of project activities and deliverables	<p>Not having any formal team meetings for the first seven weeks of a project may make it difficult to meet an ambitious timeline. As Sprint 1 is scheduled to begin January 2, 2024 and be completed by January 22, 2024, it is unclear if the current timeline is realistic or achievable. Sprint 1's prioritized backlog of user stories or features that will be worked on is unknown.</p> <p>Possible root causes or contributing factors is a new Pacxa project manager, availability of resources during the holidays, delayed access to the Salesforce sandbox environment, and need for additional project management support. DCCA and Pacxa's project managers are working closely to discuss project timeline and deliverable expectations.</p>	N/A for preliminary concerns.	Closed	01/31/24: Closed as formal weekly project meetings started in January. Risks and recommendations regarding schedule management practices were incorporated into 2024.01.001.	01/31/24	Closed as project activities started in January. The need for more rigorous schedule management practices was incorporated into 2024.01.001.
Technology	2023.05.002	Prelim	N/A	N/A	Additional information is needed regarding establishing an effective governance structure for DCCA's single-org Salesforce architecture.	<p>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.</p> <p>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.</p> <p>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.</p>	N/A for preliminary concerns.	Open	<p>06/30/23: The discovery of the Salesforce application in DCCA's main organization was completed. In July, the Discovery analysis of the remaining application's code will be completed in order for DCCA leaders to make an informed decision regarding the overall solution design and architecture.</p> <p>07/31/23 and 08/31/23: The Discovery Assessment Report outlining the impacts of moving the current implementation to DCCA's main Salesforce Org was completed; however, additional information and the final decision is still pending.</p> <p>12/31/23: With the project restart, the project will move forward with placing the BRM application in DCCA main Salesforce organization. As the revised System Architectures and Design Documentation of the solution is due in late January, IV&V will continue to monitor this observation.</p> <p>01/31/24: Pacxa is conducting meetings to address questions regarding integrations with the payment processing system and other applications within DCCA's main Salesforce organization.</p> <p>IV&V will continue to monitor the governance structure as additional information is provided.</p>		

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2023.02.001	Risk	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.	<p>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.</p> <p>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.</p>	<p>2023.02.001.R1 – Foster an open, transparent culture where it is safe and comfortable to discuss risks.</p> <ul style="list-style-type: none"> • Foster a culture of having candid dialogue, discussing potential risks, asking difficult questions, and holding each other accountable. <p>2023.02.001.R2 – In instances where changes are unavoidable, the project team should initiate change management processes early.</p> <p>Risks, costs, schedule, and quality impacts should be assessed and clearly communicated.</p>	Open	<p>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.</p> <p>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.</p> <p>05/31/23 and 06/30/23: 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.</p> <p>07/31/23 and 08/31/23: As the project pivots direction, it is important that any potential risks and issues are promptly identified and addressed.</p> <p>12/31/23: Closed due to the restart of the project. Accuity will reassess the risk management process when project activities and meetings commence.</p> <p>01/31/24: Reopened due to the need for more formalized risk management processes given the aggressive timeline and current project delays. As there are no separate risk meetings, the team needs to ensure risks are identified, addressed, and mitigated timely. There are risks raised in January and there appears to be differences in the understanding and plan for mitigating risks.</p> <p>IV&V will continue to monitor risk management activities.</p>		

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2023.02.002	Risk	N/A	Low	Untimely and insufficient completion of project management responsibilities may impact effective project execution.	<p>Aalta was contracted to provide various project, oversight, risk, and quality management services to DCCA. 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.</p> <p>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.</p>	<p>Recommendation: 2023.02.002.R1 - Clarify roles and expectations of DCCA PM</p> <ul style="list-style-type: none"> Clarify and prioritize purpose and expectations of project manager contracted services in light of project risks and lessons learned <p>2023.02.002.R2 - Develop a project schedule to manage Aalta tasks and deliverables</p> <ul style="list-style-type: none"> 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. 	Open	<p>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.</p> <p>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.</p> <p>05/31/23 and 06/30/23: 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).</p> <p>07/31/23 and 08/31/23: Aalta's new project manager is getting up to speed on the project and helping to coordinate the results of the Discovery Analysis and next steps. The Project PM's need to work together to address systemic project challenges such as ongoing project delays, resource management, and the need for more formalized processes.</p> <p>12/31/23: Accuity decreased the severity rating from Level 1 (High) to Level 3 (Low) with the restart of the project. Although project deliverables and activities appear to be delayed in the first six weeks, Aalta's role in supporting project oversight and execution is unknown.</p> <p>01/31/24: Aalta is meeting regularly with the project sponsor and Pacxa PM; however, IV&V has limited visibility into those interactions. As some deliverables need improvement or appear identical to the ones submitted in the original project phase, DCCA and Aalta should carefully review them to avoid previous project issues. Aalta did not complete formal deliverable review checklists on submitted deliverables. Review of Pacxa deliverables using the comment log was not provided timely, and the deliverable review process is being reevaluated by DCCA and Aalta.</p> <p>Accuity will continue to review project management processes and the rigor with which project deliverables are reviewed.</p>		

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Process	2022.08.006	Risk	Low	Low	A lack of quantitative success metrics may lead to differences in the interpretation of project success.	Project goals were drafted; however, quantitative success metrics were not yet defined. Clear and measurable success metrics ensure that everyone is working to the same definition of success, that progress can be monitored, and corrective actions can be taken if necessary.	<p>2022.08.006.R1 – Formalize measurable goals and success metrics.</p> <ul style="list-style-type: none"> 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. <p>2022.08.006.R2 – Collect baseline data and monitor progress.</p> <ul style="list-style-type: none"> 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	<p>Refer to prior Monthly IV&V Reports for status updates before December 2022.</p> <p>12/31/22 and 1/31/23: The Project will work to define KPIs and success metrics.</p> <p>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.</p> <p>03/31/23: Project success metrics are still not defined and an updated target date is not available.</p> <p>04/30/23: Project success metrics are under development and expected in May 2023.</p> <p>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.</p> <p>06/30/23, 07/31/23, and 08/31/23: Project success metrics are overdue and still pending finalization.</p> <p>12/31/23: Accuity decreased the severity rating from Level 2 (Moderate) to Level 3 (Low) with the project restart. IV&V reviewed this finding with both PMs in December 2023, emphasizing the importance to define project success metrics considering lessons learned from the past efforts. The project did define critical success factors as part of the Project Restart Kick-off meeting, and should now develop specific metrics that will be used to measure project success and to monitor how well the project is meeting its goals and objectives.</p> <p>01/31/24: Accuity reviewed the Project Management Plan DED and commented on the need for project success metrics.</p> <p>Accuity will review the development and communication of success metrics in the upcoming months.</p>		

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Process	2023.08.001	Risk	High	High	Insufficient quality management practices may lead to rework and impact the quality, performance, and functionality of the solution.	<p>Quality Management is a vital part of project management involving planning, executing, and monitoring to ensure activities and deliverables meet project requirements and customer needs. A number of project deliverables were provided; however, more rigor is needed to ensure stronger execution of quality activities:</p> <ul style="list-style-type: none"> Quality Management Plan: Pacxa developed a quality plan in December 2022 describing the approach, processes, and controls put in place to ensure the BRM project objectives are met and expected results are achieved. Quality Assurance Surveillance Plan: Aalta provided their quality plan in December 2022 with guidelines DCCA will use in evaluating the technical performance of the system integrator. As the DCCA project manager, it outlines its quality responsibilities as overseeing the quality aspects of the project, servicing as the technical liaison, and being responsible for the final inspection and acceptance of all reports. Quality Management Reports: Quality Management reports were provided once in May 2023 with plans to update it with results from the Client Interim Review. Quality management is a shared responsibility and involves all stakeholders in the project, including project managers, team members, vendors, and users. All stakeholders must work together to establish clear quality objectives, define the quality standards, and implement quality control processes. Roles and responsibilities should be clearly communicated and reinforced so stakeholders know their role in executing plans and utilizing quality metrics effectively. Despite the delivered quality plans and reports, the project still displayed signs that the execution of quality activities could be improved. Some examples include: <ul style="list-style-type: none"> The project does not have a clear requirements management process in place and did not identify noncompliance with the FedRAMP-certified environment requirement until March 2023. Based on the results of an independent Salesforce Health Check, a substantial quantity of code with high complexity was identified, along with opportunities to enhance coding practices. The Client Interim Review resulted in over 40 defects and 105 enhancements. Defects are items not working per the approved design and enhancements are items to be added into the backlog for redesign and development. The insufficient review and unclear review process of design documentation led to inaccurate development of system functionality. 	<p>2023.08.001.R1 – Improve the execution of the project's quality plans.</p> <ul style="list-style-type: none"> Clarify project team's quality roles and responsibilities and assign specific quality tasks. Increase the frequency of quality reports to monitor adherence to quality standards. If quality standards are not being met, document the gap, the quality improvements that need to be made, and take corrective action. <p>2023.08.001.R2 – Conduct periodic technical reviews to increase visibility of development best practices.</p> <ul style="list-style-type: none"> Consider discussing development practices updates and key development metrics (e.g., % of configuration using out-of-the-box features; % of code customized, % of apex code considered to be high complexity, etc.) at technical reviews. Consider including technical SMEs from all stakeholder groups for meaningful review and feedback. 	Closed	12/31/23: Closed due to the restart of the project. Accuity will reassess quality management process and practices when applicable.	12/31/23	Closed due to the restart of the project with a new project team, processes, and deliverables.

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Technology	2023.05.001	Risk	High	High	<p>Insufficient review of design documentation may lead to inaccurate development impacting the quality of the solution.</p>	<p>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:</p> <ul style="list-style-type: none"> • 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. <p>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.</p> <p>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).</p> <p>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.</p>	<p>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.</p> <ul style="list-style-type: none"> • 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. <p>2023.05.001.R2 – Develop a process for reviewing design documentation for current and future JAD sessions.</p> <ul style="list-style-type: none"> • 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. 	Closed	<p>06/30/23: DCCA completed thorough reviews of JAD 13 and 14 design documents timely. The Pacxa functional team will conduct additional design sessions to address the design gaps discovered in the previously approved design documentation.</p> <p>07/31/23: DCCA reviewed JAD 15 and 16 design documentation timely. For JAD 1 to JAD 12, Pacxa plans to update the previously approved design documents based on information gathered during the CIR triage sessions and send them to DCCA for review and approval.</p> <p>08/31/23: All project resources are on hold, including updating and reviewing design documents.</p> <p>12/31/23: Closed due to the restart of the project. Accuity will reassess this process of design documentation review when applicable.</p>	12/31/23	Closed due to the restart of the project with a new project team and processes.

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Technology	2023.03.001	Issue	High	High	<p>Uncertainty regarding the solution capabilities, architecture, and design could lead to corrective actions and impact project planning, costs, and schedule.</p>	<p>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.</p> <ul style="list-style-type: none"> 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. <p>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, and schedule.</p>	<p>2023.03.001.R1 – Strategic choices regarding system architecture and design should be revisited.</p> <ul style="list-style-type: none"> 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. <p>2023.03.001.R2 – Review and agree on solution architecture and design.</p> <ul style="list-style-type: none"> Conduct a thorough review of the Architecture and Technical Design to ensure mutual understanding. <p>2023.03.001.R3 – Formally document the technology decisions and follow the project's established change management process.</p> <ul style="list-style-type: none"> 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. <p>2023.03.001.R4 - Conduct a lessons learned meeting to identify areas for improvement and avoid past project challenges.</p>	Closed	<p>04/30/23: 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.</p> <p>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.</p> <p>06/30/23: There is still no decision on the new solution architecture and design. The discovery of the Salesforce application in DCCA's main organization was completed. In July, the Discovery analysis of the remaining application's code will be completed resulting in a report of findings, solution options, and estimated costs in order for DCCA leaders to make an informed decision.</p> <p>07/31/23: The Discovery Assessment Report outlining the impacts of moving the current implementation to the DCCA Main Salesforce Org was completed; however, additional information and the final decision are still pending.</p> <p>08/31/23: Due to the full pause placed on all project activities this month by the DCCA executive sponsor, Accuity changed this observation type from a Risk to an Issue as the project costs and schedule are impacted.</p> <p>12/31/23: Closed due to the restart of the project with a new project development team, technical team, and pending design. Accuity will reassess the technology solution and design when made available.</p>	12/31/23	Closed due to the restart of the project with a new project team and processes.

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Process	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 fulfills all requirements and expectations.	<p>This was originally reported in the January 2023 IV&V Monthly Report as a 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.</p> <p>Per contract requirements, the Aalta PM is responsible for working with DCCA to develop objective and measurable standards that are traceable to the objectives of the system integrator (SI) contract and reconcile the gap on an ongoing basis. Aalta is developing a requirements dashboard using Smartsheets for tracking Pacxa's contract requirements. Although the project kicked-off Development Sprint 3, the Smartsheets tool is still incomplete, has not been put into use, and DCCA's processes to trace, test, and approve requirements are still not defined.</p> <p>Furthermore, as there are currently four separate tools with various project requirements, clarifying who is cross-referencing the requirements, contract deliverables, and project objectives is paramount to ensuring there is no duplication of efforts or gaps in the process.</p> <p>1) Smartsheets Tool: Aalta loaded Pacxa's contract requirements into Smartsheets. It has contract requirements, but does not include all functional/technical requirements or project deliverables. 2) ADO Tool: Pacxa uses this tool to track their development work including user stories, bugs, features, test cases, and defects. 3) Requirements Traceability Matrix (RTM): The RTM maps the projects functional and technical requirements to each epic and feature in the ADO Tool. The one-to-many mapping of requirements to user stories may increase the complexity of testing, approving, and validating requirements. 4) Microsoft Project Schedule Tool: Pacxa's document deliverables are being traced in both the Smartsheets tool and Microsoft Project Schedule. Aalta's deliverables are not being tracked in any tool.</p> <p>The project has completed 8 of 19 planned JAD sessions. After each JAD session, Pacxa provides design documents with process flow diagrams, use cases, use case diagrams, and other information for the SI to build and test the solution. It is unclear if these documents are being thoroughly reviewed by DCCA and cross-checked against the contractual documents and the RTM to ensure requirements are being met. Furthermore, the demonstrations for Sprint 1 and 2 were completed but there is currently no process to review the user stories in connection with each Sprint for satisfaction against the requirements and acceptance criteria.</p>	<p>2023.01.001.R1 – DCCA PM to formalize and communicate a clear process to review and accept project requirements and deliverables.</p> <ul style="list-style-type: none"> 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. <p>2023.01.001.R2 – Develop clear traceability and understanding of all contract requirements.</p> <ul style="list-style-type: none"> The DCCA and Aalta PMs should reference and track all contractual requirements and vendor responsibilities contained within the Request for Proposal, RTM, proposals, best and final offer documents, and contracts. 	Closed	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>06/30/23, 07/31/23, and 8/31/23: Pacxa and DCCA worked together to develop an approach to tracking DCCA's solution requirements in the ADO tool. DCCA's PM now needs to formalize and communicate a clear process to review and accept project requirements.</p> <p>12/31/23: Closed due to the restart of the project. Accuity will reassess requirements management processes when applicable.</p>	12/31/23	Closed due to the restart of the project with a new project team and processes.
Technology	2023.01.002	Risk	Moderate	Moderate	Multiple outstanding data conversion items are preventing the timely execution of data activities which may have impacts on the project schedule.	<p>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:</p> <ul style="list-style-type: none"> HBE Portal to Clarity: 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) <p>Status and steps to address the open data conversion issues are tracked in the RAID Log as open risks and actions.</p>	<p>2023.01.002.R1 – Enhance management and execution of the action items to address all the outstanding data conversion issues.</p> <ul style="list-style-type: none"> Risks, costs, and schedule impacts of delays and decisions must be clearly communicated and understood. The action items should identify the persons responsible and target dates to ensure timely resolution of open items. DCCA Technical leads to prioritize and escalate critical issues. 	Closed	<p>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.</p> <p>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 Clarity solution is still pending.</p> <p>04/30/23, 05/31/23, 06/30/23, and 07/31/23: Limited progress continues to be made for the various data conversion phases. Some phases and activities are dependent on storage and other technical decisions.</p> <p>08/31/23: The DCCA BRM Project Sponsor officially put the project on hold on August 17, 2023, suspending all project meetings and activities, including data conversion.</p> <p>12/31/23: Closed due to the restart of the project. Accuity will reassess data conversion processes and activities when applicable.</p>	12/31/23	Closed due to the restart of the project with a new project team and technology solution.

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
Process	2022.09.001	Risk	Low	High	Current project delays may impact the overall project timeline.	<p>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.</p> <p>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.</p>	<p>2022.09.001.R1 – Improve schedule management processes.</p> <ul style="list-style-type: none"> 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. 	Closed	<p>Refer to prior Monthly IV&V Reports for status updates before December 2022.</p> <p>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.</p> <p>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.</p> <p>02/28/23 and 03/31/23: Acuity increased the severity rating from Level 2 (Moderate) to Level 1 (High). It is unclear if ongoing schedule delays will impact the overall timeline. Additionally, key pending decisions and technical issues could significantly impact the ability to meet the aggressive December 2023 Go-Live date.</p> <p>04/30/23, 05/31/23, 06/30/23, and 07/31/23: 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.</p> <p>08/31/23: Due to the full pause and time taken to complete a comprehensive review, the project costs and schedule will be impacted.</p> <p>12/31/23: Closed due to the restart of the project. Acuity will reassess schedule management processes when applicable.</p>	12/31/23	Closed due to the restart of the project with a new project team and processes.

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE REASON
People	2022.08.002	Risk	Low	Moderate	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.	<p>2022.08.002.R1 – Evaluate project resource needs and acquire additional resources.</p> <ul style="list-style-type: none"> - 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. <p>2022.08.002.R2 – Provide adequate training and support to assigned resources to be able to perform role.</p> <ul style="list-style-type: none"> - Consider performing general project management training so that resources understand general project processes and the purpose of project activities. - Consider providing additional support and information to resources regarding best practices and common approaches for assigned tasks or areas of responsibility. <p>2022.08.002.R3 - Develop a plan and processes to optimize utilization of DCCA project resources.</p> <ul style="list-style-type: none"> - Ensure that only the necessary resources are attending each of the various Build and Validation stage sessions. - 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 overbooked. 	Closed	<p>Refer to prior Monthly IV&V Reports for status updates before December 2022.</p> <p>12/31/22: Project team members are generally able to keep up with current project activities. Additional project activities involving DCCA team members will begin to run in parallel with development Sprint 1 in January 2023.</p> <p>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).</p> <p>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.</p> <p>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 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.</p> <p>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.</p> <p>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 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).</p> <p>06/30/23: DCCA project members actively participated in Joint Application Design (JAD) sessions, completed a detailed review of JAD 13 and 14 design documents, and met their deadline to update 60 new business registration forms. Despite heavy workloads, DCCA employees are committed and continue to meet target deadlines. To ensure that this level of project effort is sustainable into the future, the revised project schedule should carefully evaluate project resource needs and develop a realistic plan to ensure resources are not overbooked.</p> <p>07/31/23: Accuity decreased the severity rating from Level 1 (High) to Level 2 (Moderate). Despite heavy workloads, DCCA employees are committed and reviewed Joint Application Design (JAD) 15 and 16 design documentation timely.</p> <p>08/31/23: Due to the full project pause, all project resources are currently on hold, except key project leaders who continue to work through the technical decisions.</p> <p>12/31/23: Closed due to the restart of the project with a new project team and schedule. Accuity will reassess the adequacy and management of project resources when applicable.</p>	12/31/23	Closed due to the restart of the project with a new project team and schedule.

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	CLOSED DATE	CLOSURE 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.	<p>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:</p> <ul style="list-style-type: none"> 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. <p>A clear understanding of the Aalta's scope of work, approach, and timeline is necessary to ensure a smooth execution of project management activities for optimal team and project performance.</p>	<p>2022.11.001.R1 – Clarify Aalta's contract requirements.</p> <ul style="list-style-type: none"> Discuss the reports and work products from Aalta's proposal and classify as either 1) contract deliverables or 2) activities that Aalta only assists the project with. For each contract deliverable, clarify purpose, content, and expectations. For activities that Aalta only assists with, clearly outline the respective roles and responsibilities of each party. Consider whether contract deliverables and activities still make sense for the areas of overlapping scope of work. <p>2022.11.001.R2 – Provide schedule information for Aalta tasks.</p> <ul style="list-style-type: none"> 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. 	Closed	<p>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.</p> <p>01/31/23: Aalta confirmed their contract deliverables. A timeline and schedule for open deliverables is still pending.</p> <p>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).</p> <p>03/31/23: Although the UAT Plan is still high level, Aalta held several meetings to walk through UAT responsibilities and processes. A high-level walkthrough of the PWS dashboard was provided showing how Pacxa's contract requirements will be tracked.</p>	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.	<p>2022.08.003.R1 – Assemble and formalize an executive steering committee.</p> <ul style="list-style-type: none"> 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. 	Closed	<p>09/30/22: DCCA is still in the process of formalizing steering committee members and documenting the governance model.</p> <p>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.</p> <p>11/30/22: The project governance model was established and the first executive steering committee (ESC) meeting was held.</p>	11/30/22	Closed as the governance model was established.
Process	2022.08.004	Risk	Low	Low	A lack of cost management practices may lead to unexpected or improper costs.	Major project costs were finalized for the system implementor (Pacxa), project manager (Aalta), and IV&V (Accuity) contracts. However, it is unclear how the complete project budget will be managed and how additional costs outside of the major contracts will be identified. For example, certain assumptions were made regarding the use of existing enterprise licensing for DocuSign CLM and Salesforce community licenses. As additional information and clarification of technical requirements is obtained, these assumptions and the potential additional costs must be closely managed. Other costs for project tools (e.g., code repository, project management, testing) should also be considered and managed.	<p>2022.08.004.R1 – Prepare a comprehensive project budget and a schedule of long-term operational costs (e.g., licenses, subscriptions, maintenance, cloud services).</p> <p>2022.08.004.R2 – Develop DCCA cost management processes.</p> <ul style="list-style-type: none"> Develop processes to prepare cost variance analysis and reports. Develop processes to monitor contract deliverables against payment terms. 	Closed	<p>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).</p> <p>10/31/22: Processes for monitoring contract costs and tracking a comprehensive project budget still need to be formalized.</p> <p>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.</p>	11/30/22	Closed as sufficient cost management processes are in place.

ASSESSMENT AREA	OBSERVATION ID	TYPE	ORIGINAL SEVERITY	CURRENT SEVERITY	OBSERVATION	ANALYSIS	RECOMMENDATIONS	STATUS	STATUS UPDATE	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).	<p>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.</p> <p>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.</p>	<p>2022.08.007.R1 - Discuss possible options.</p> <ul style="list-style-type: none"> Risks, costs, and impacts for each option must be clearly communicated and understood. <p>2022.08.007.R2 - Set a plan of action.</p> <ul style="list-style-type: none"> Detail out the tasks, targeted due dates, and responsible parties. 	Closed	<p>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.</p> <p>10/31/22: Progress was made on key technical decisions but final resolution is still pending.</p> <p>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.</p>	11/30/22	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.	<p>2022.08.005.R1 – Implement recurring meetings.</p> <ul style="list-style-type: none"> 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	5	<p>The current high-level project schedule lacks sufficient detail to ensure that the project team has a comprehensive understanding of all project activities.</p> <p>RESPONSE: See comment below about Methodology – Item #4.</p>	Pacxa/AST	<p>Statements and status updates from Pacxa/AST are for progress made after the January reporting period related to schedule management and development methodology. Progress made on these processes and responsibilities will be reflected in future IV&V reports. No changes made to the January IV&V Report.</p>
2	5	<p>Furthermore, greater transparency around sprint planning and execution is needed considering the slow progress made during the project's first two sprints and need for increased sprint velocity.</p> <p>RESPONSE: We have scheduled Sprint Planning sessions (meeting invites have been sent) and included DCCA, IV&V, PACXA and AALTA on it, so everyone is on the same page. After each sprint planning session, a recap will be sent on what has been agreed upon within the sprint reviewed.</p>	Pacxa/AST	<p>Statements and status updates from Pacxa/AST are for progress made after the January reporting period related to project management, project execution and their development methodology. The first formal joint Sprint Planning meeting was held in early February. Progress made on these processes and responsibilities will be reflected in future IV&V reports. No changes made to the January IV&V Report.</p>

3	5	<p>Clearly communicated project management practices, effective execution of sprints, and detailed project schedules are needed to ensure that all project members are aligned and understand their tasks and responsibilities, which reduces confusion and enhances productivity. Clear and transparent project plans can also build trust and promote a positive team environment.</p> <p>RESPONSE: We have had Project Schedule review session on 2/13 with DCCA, AALTA, PACXA and IV&V to ensure all members are on the same page regarding the schedule. The updated schedule was updated and distributed the following day.</p>	Pacxa/AST	<p>Statements and status updates from Pacxa/AST are for progress made after the January reporting period related to project management, execution and their agile methodology. Progress made on these processes and responsibilities will be reflected in future IV&V reports. No changes made to the January IV&V Report.</p>
4	6	<p>Project is lacking rigorous schedule management practices which may impact the ability to properly manage resources, quality, and timeliness of project execution.</p> <p>RESPONSE: We are following the methodology as outlined in our SOW (section 3.4), which is proven for success and purpose built for Government. This combines some aspects of PMBOK Waterfall (in creating a high level project plan) and PMBOK Agile (in creating user stories, tasks, sprints, daily scrums and extracting the resulting WBS from JIRA.</p>	Pacxa/AST	<p>The lack of rigorous schedule management practices referred to schedule delays, missing tasks, and the need for more granular detail of tasks and resources related to both development and non-development activities. Progress made on these processes and responsibilities will be reflected in future IV&V reports. No changes made to the January IV&V Report.</p>
5	6	<p>Unclear sprint planning and execution may result in misalignment of sprint goals and objectives, low quality work, and potential rework.</p> <p>RESPONSE: This is addressed by having sprint planning sessions held every sprint. Aalta, DCCA, IV&V and PACXA are involved in these meetings, so they have visibility into what is upcoming. Refer to item #2 above.</p>	Pacxa/AST	<p>Statements and status updates from Pacxa/AST are for progress made after the January reporting period related to project management, project execution and their development methodology. The first formal joint Sprint Planning meeting was held in early February. Progress made on these processes and responsibilities will be reflected in future IV&V reports. No changes made to the January IV&V Report.</p>

6	6	<p>Data Conversion activities are delayed and tasks related to data extraction, cleansing, and validation need to be clarified.</p> <p>RESPONSE: The data migration team now has access to a staging environment and all necessary tooling to do the work. The team is continuing to evaluate the magnitude of the effort and will advise as to the feasibility of the schedule.</p>	Pacxa/AST	<p>Statements and status updates from Pacxa/AST are for progress made after the January reporting period related to data conversion activities. Progress made on these processes and responsibilities will be reflected in future IV&V reports. No changes made to the January IV&V Report.</p>
7	6	<p>Assess the need for additional Pacxa resources for project management support. The current Pacxa project manager is actively facilitating functional design sessions and other key activities, which may impact his ability to focus on project management execution.</p> <p>RESPONSE: We have added another project resource to help the Pacxa/AST PM with user story consolidation, so that he can focus on execution. The functional design sessions will be ending soon – so that the Pacxa/AST PM can further focus on execution.</p>	Pacxa/AST	<p>The additional project resource was onboarded on February 15, 2024, and will be reflected in the February IV&V report. No changes made to the January IV&V Report.</p>
8	7	<p>Improve the project schedule by creating a WBS broken down into smaller, more manageable components.</p> <p>RESPONSE: We are in the process of doing this, by consolidating the user stories – as you know there are 1300 user stories, many of which are redundant. Once these are consolidated (targeting Feb – due to the volume it is time consuming), we will be able to generate a WBS from JIRA. It would be important to highlight that we are already using JIRA to track user stories and sprints and following an agile methodology, with daily scrums and sprint wise planning sessions, and that we are in the process of user story consolidation to arrive at a workable WBS targeted in Feb.</p>	Pacxa/AST	<p>Statements and status updates from Pacxa/AST are for progress made after the January reporting period related to schedule and project management activities and tools. Progress made in February to propose the consolidation of user stories and provide a revised schedule that includes missing tasks such as data conversion will be reflected in future IV&V reports. No changes made to the January IV&V Report.</p>

9	NA	<p>One of the risks Pacxa/AST had identified and shared on our status report was: Re-examination of previously identified requirements may delay the overall project.</p> <p>With the mitigation as: DCCA should focus on a review of high priority items and minimize change unless absolutely necessary.</p>	Pacxa/AST	<p>Additional comments provided by Pacxa/AST related to deliverable management, risk management, and risk mitigation. The mitigation plan noted differs from the mitigation plan outlined for this risk in the weekly status report. The IV&V report already reflects an open risk management observation (2023.02.001). In Appendix C, the status of the open risk was updated to reflect the differences in the mitigation plan referenced in Pacxa/AST's comment supporting the need for more formalized risk management processes.</p>
10	NA	<p>There was fundamentally a disconnect/communication gap between the various parties involved in the project.</p> <p>The mitigation that we have employed to address this: Hold weekly meetings between DCCA, Aalta and Pacxa/AST prior to the weekly status meetings, so that everyone is on the same page with schedule and action items. A weekly PM meeting has been established on Tuesdays at 9 AM. We have decided to clearly call out Action items with due dates and owners on our status call. Also, that we will no longer be making any changes to the schedule or what goes into a sprint, without obtaining written approval from DCCA stakeholders and keeping Aalta in the loop.</p>	Pacxa/AST	<p>Additional comments provided by Pacxa/AST are for progress made related to communication management. A meeting was held in mid-February to discuss and clarify project roles and responsibilities. Key activities conducted in February will be reported in future IV&V reports. No changes made to the January IV&V Report.</p>
11	NA	<p>Issue with the current review process and obtaining timely feedback from DCCA using the Deliverable Comment Form (DCF).</p> <p>Currently addressing by revamping the deliverable review process. Pacxa/AST will monitor closer with follow-up reminders, have scheduled review sessions with DCCA, and ensure all comments are documented within the deliverable document and/or DCF to ensure all items are addressed, and we receive timely feedback from DCCA.</p>	Pacxa/AST	<p>January IV&V Report was updated to reflect additional information provided related to deliverable review on page 6.</p>



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