JOSH GREEN, M.D.
GOVERNOR
*KE KIA'ĀINA*

KEITH A. REGAN
COMPTROLLER
*KA LUNA HO'OMALULUHANA LAULĀ*

CHRISTINE M. SAKUDA
CHIEF INFORMATION OFFICER
*LUNA 'ENEHANA*

DEPT. COMM. NO. 403

**STATE OF HAWAIʻI | *KA MOKUʻĀINA O HAWAIʻI***
**DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | *KA ʻOIHANA LOIHELU A LAWELAWE LAULĀ***

**OFFICE OF ENTERPRISE TECHNOLOGY SERVICES | *KEʻENA HOʻOLANA ʻENEHANA***

P.O. BOX 119, HONOLULU, HAWAII 96810-0119

June 16, 2026

The Honorable Ronald D. Kouchi
President of the Senate
and Members of the Senate
Thirty-Third State Legislature
State Capitol, Room 409
Honolulu, Hawaiʻi 96813

The Honorable Nadine K. Nakamura
Speaker and Members of the
House of Representatives
Thirty-Third State Legislature
State Capitol, Room 431
Honolulu, Hawaiʻi 96813

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

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

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

Sincerely,

Christine M. Sakuda
Chief Information Officer
State of Hawaiʻi

Attachments (2)

# Hawaii Department of Human Services Systems Modernization Project

## Final IV&V Status Report
## for Reporting Period May 1 – 31, 2026

*Submitted: June 15, 2026*

PUBLIC CONSULTING GROUP

Solutions that Matter

# Overview


- Executive Summary
- IV&V Findings and Recommendations
- IV&V Engagement Status
- Appendices
  - A – IV&V Criticality Ratings
  - B – Risk Identification Report
  - C – Acronyms and Glossary
  - D – Background Information


PUBLIC CONSULTING GROUP
Solutions that Matter

# Executive Summary

# Executive Summary – 1

The project team remained focused on conducting BES Release 1.0 User Acceptance Testing and is currently on schedule and preparing for Maintenance and Operations to support the Pilot go-live on October 12, 2026. DHS approved a key project deliverable, the BI-22a Systems Integrity Review Tool (SIRT) for UAT, which was reviewed and discussed with FNS and DHS to ensure compliance and respond to questions. A second SIRT is planned to be completed prior to Pilot go-live and will incorporate the new Change Requests currently at various stages of the System Development Life Cycle, which are planned to be included in the Pilot release.

A new Risk was documented this month regarding reports planned to be generated by BES on a regular schedule and those considered on-demand and requested by users. IV&V is working with DHS and the ASI to understand the depth and breadth of testing to validate that not only are the reports in the required format, but that each report uses valid processing logic and data as it is generated.

Other risk areas include:

**Maintenance and Operations**: Work remains to finalize and test the ServiceNow tools and processes prior to Pilot. Additionally, completing the definition of governance, help desk support, and related documentation continues to be delayed. The delays may also have downstream impacts, requiring processes and tools to be refined, potentially leading to updated training materials and further testing. These efforts also cause resource challenges for DHS and the ASI, which are involved with other areas such as UAT and readiness activities.

**Requirements**: IV&V notes improvement in the new reports the ASI developed for the final Requirements Traceability Matrix deliverable (RTM). Outstanding items remain but are scheduled for completion next month. This will facilitate the project team's validation that all contractual requirements have been delivered and tested for BES 1.0.

**Testing**: IV&V is monitoring the Project Teams' efforts to mitigate concerns related to batch processing and Time Travel test management, which caused significant challenges during the last BES 1.0 UAT.

The pilot will begin approximately 4 months from now. The project team continues to collaborate effectively to prioritize critical functionality, processes, and training for the Pilot site.

| Mar | Apr | May | Category | IV&V Observations |
|---|---|---|---|---|
| N/A | M | M | Project Management | IV&V continues to be concerned regarding persistent delays in the M&O schedule and seeks evidence of consistent, on-time task completion to support readiness for the Pilot go-live scheduled for October 12, 2026. |

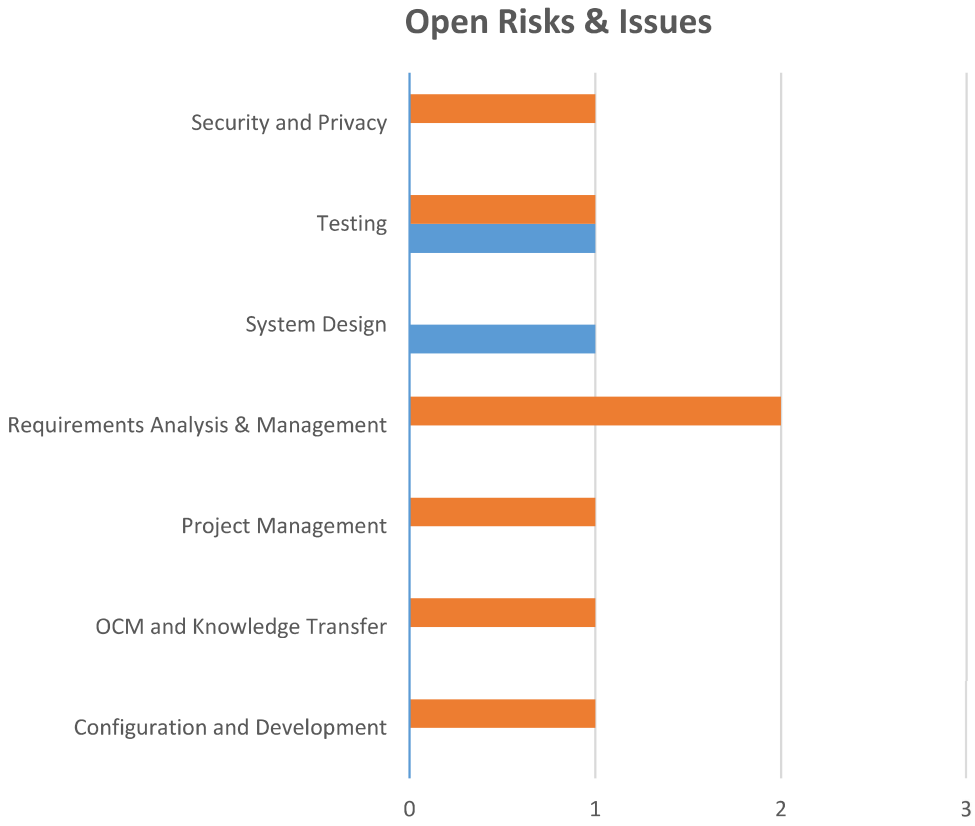
# Executive Summary – 2

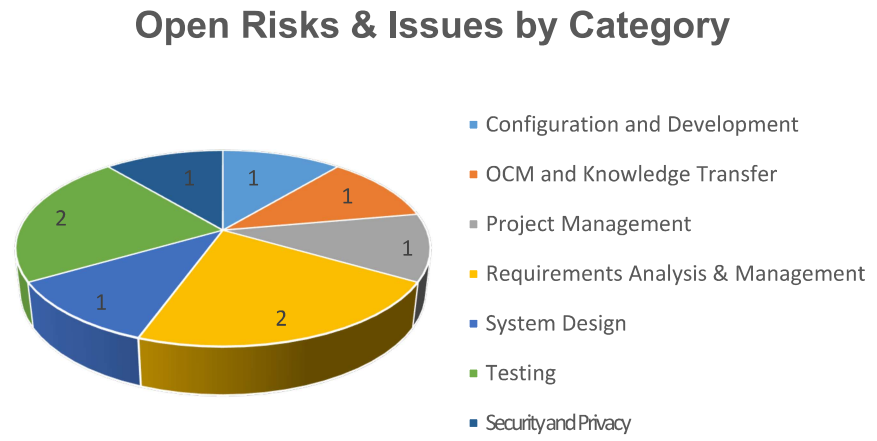
| Mar | Apr | May | Category | IV&V Observations |
|---|---|---|---|---|
| M | M | M | Configuration and Development | ASI continued development activities on four Change Requests (CRs), with the latest scheduled completion date currently set for July 9, 2026. Additionally, the delivery of the Configuration Management Plan has been delayed from April 20, 2026, to September 4, 2026. This delay is a concern for both DHS and IV&V, given the critical importance of establishing, validating, and fully testing configuration management processes prior to Pilot go-live. |
| L | L | L | Testing | The project team is reporting UAT is on-schedule. DHS and the ASI meet daily to review progress and status of defects. |
| M | M | M | Security and Privacy | The ASI and DHS security teams continue to remediate open findings from vulnerability and configuration security scans. |
| M | M | M | Requirements Analysis & Management | The ASI presented a new report to DHS to assist in validating the requirements. Minor adjustments were noted and validation of all required documentation of changes to requirements is in progress. |
| M | M | M | OCM and Knowledge Transfer | BES will be a significant change for the BESSD staff. The project team is working with the Pilot site by providing Demo's of the system and maintaining a Question/Answer document and identifying potential gaps in the training plan and job aids. |
| L | L | L | System Design | As the BES project team prepares for Pilot, IV&V will monitor for a clear Infrastructure management plan from the ASI for supporting BES. |

# IV&V Findings and Recommendations

# IV&V Findings and Recommendations – chart 1

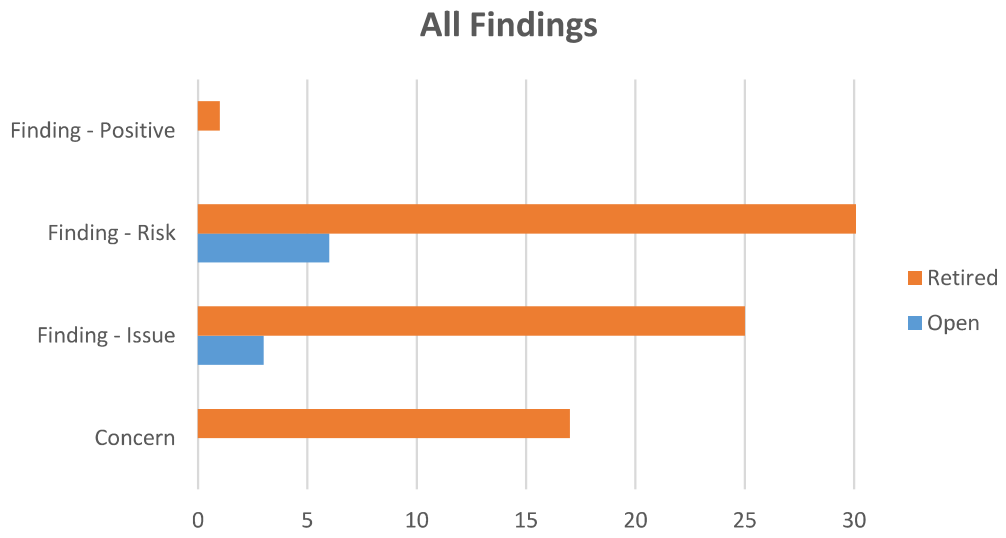
*As of the May 2026 reporting period, PCG is tracking 9 open findings (7 risks, 2 issues) and has retired 88 findings. Of the 9 open findings, 7 are Medium, and 2 are Low.*



# IV&V Findings and Recommendations – chart 2

*The following figure provides a breakdown of the 100 IV&V findings (positive, risks, issues, concerns) by status (open, retired).*



# IV&V Findings and Recommendations – 1

## Findings Opened During the Reporting Period

| # | Finding | Category |
|---|---|---|
| 115 | **Risk - Partial validation of report data accuracy and logic prior to go-live may result in additional validation and rework during the Pilot Period. - Medium**<br><br>**Observation**: When DHS raised project risk #73 on April 30, 2026, during UAT, IV&V observed that the ASI confirmed that report testing during SIT mostly validated formatting, visual presentation, and report job execution. This included checking if reports could be generated, accessed, viewed, downloaded, and printed. However, there is limited evidence that the ASI systematically validated the accuracy of the underlying data and report logic. The ASI stated that their testing was limited by the lack of documented report requirements.<br><br>The required level of report validation in UAT exceeds the bandwidth of DHS testers to complete. To address this gap, the ASI has proposed establishing a recurring report working group to prioritize validation activities for critical Day One reports and triage outstanding UAT reports defects. This effort is intended to provide a structured approach to addressing the most time-sensitive reporting needs ahead of Pilot, pending DHS alignment and meeting scheduling.<br><br>A project issue was opened in January 2024 (#59) regarding concerns by the ASI in obtaining information needed from DHS to confirm requirements for reports. This issue was closed in March 2024 by the ASI reports project manager with all mitigation resolved so that the ASI could collect requirements for reports. IV&V did not observe any additional concerns about report requirements until DHS raised project issue #73 during UAT. | Testing |

# IV&V Findings and Recommendations – 2

## Findings Opened During the Reporting Period - continued

| # | Finding | Category |
|---|---|---|
| 115 | **Risk - Partial validation of report data accuracy and logic prior to go-live may result in additional validation and rework during the Pilot Period. - Medium**<br>**Significance:** While prioritizing Day One reporting readiness supports immediate operational needs, deferring comprehensive validation across the full report inventory introduces risk. Report validation can uncover defects in the underlying system processing that may not be identified through other testing activities. As a result, incomplete validation of report logic and accuracy increases the likelihood that data accuracy or processing issues remain undetected.<br>Incomplete validation now will require additional staff attention and effort during the pilot period to identify and remediate defects, potentially increasing demand on project resources during early operations, when focus should be on system stabilization and high-priority issues. While reports do not directly modify system data, insufficient validation of report logic may reduce confidence in reported outputs and delay identification of underlying system defects. | Testing |

| Recommendations | Progress |
|---|---|
| • Establish a structured reporting working session to confirm Day One report scope, define expected outputs, and validate report data accuracy and logic against source data for priority reports, with focus on those impacting core eligibility and benefit outcomes. | In Process |
| • Define a consistent approach, clear ownership, and measurable tracking for report validation to ensure reporting readiness is transparent and fully verified prior to Pilot. | New |

# IV&V Findings and Recommendations – 3

## Findings Retired During the Reporting Period

| # | Finding | Category |
|---|---|---|
| 113 | **Preliminary Concern - Batch failure support model may lead to UAT testing delays and constraints**<br>The ASI has hired four onshore batch engineers, with staggered onboarding over the next two months to support batch operations. Additionally, the ASI has provided IV&V with a UAT support model outlining the approach for managing batch job activities.<br>Based on the information provided, IV&V is retiring this preliminary concern and will continue to monitor the effectiveness of the batch support process as UAT progresses. | Testing |

# IV&V Findings and Recommendations – 4

## Preliminary Concerns Investigated During the Reporting Period

| # | Finding | Category |
|---|---|---|
| 112 | **Preliminary Concern - Insufficient Time Travel environment preparation could lead to UAT execution and testing timelines**<br>The ASI has provided initial evidence outlining a high-level management approach for the time travel environment to be used during UAT and is expected to provide additional supporting details next month. While testing activity related to this environment has been limited to date, and the client has not expressed concerns with the current approach, IV&V will continue to monitor the performance and management of the time travel environment as UAT progresses. | Testing |

# IV&V Findings and Recommendations – 5

## Preliminary Concerns Investigated During the Reporting Period

| # | Finding | Category |
|---|---|---|
| 116 | **Preliminary Concern - Batch job stability and performance issues may impact UAT completeness and Pilot readiness**<br><br>**Observation**: Batch job failures and processing errors observed during UAT raise concerns regarding the stability and reliability of overall batch processing. Given the critical role of batch jobs in supporting eligibility processing, case management, and other core workflows, continued instability may impact completion of end-to-end testing and introduce risk to Pilot readiness if not fully resolved. Additionally, the current daily UAT batch summary report provides only job execution status (success/failure) and lacks key operational metrics (e.g., records processed, error/skipped counts), limiting the client's ability to confirm that batch jobs are producing accurate business results during UAT. Per DHS's request, the ASI is currently working on a report to address these gaps.<br><br>**Significance:** Industry standards indicate that consistently executing batch jobs are critical to large-scale eligibility systems, as they support core system functions such as eligibility determination, benefit issuance, case updates, and generation of required notices and reports. Inconsistent or failed batch processing can result on incorrect system outcomes, including missed or delayed benefits, inaccurate case statuses, and lack of required client communication. | Configuration and Development |

# IV&V Findings and Recommendations – 6

## Project Management

| # | Key Findings | Criticality Rating |
|---|---|---|
| 114 | **Risk – Incomplete BES M&O operational processes and procedures prior to UAT and Pilot may leave the project unprepared for statewide implementation.**<br>To mitigate delays in completing documentation tasks required for the operations team, the ASI has increased the volume of documents submitted to DHS and IV&V for review and conducted follow-up discussions to address and resolve feedback. Despite these efforts, key activities have experienced further delays in the latest M&O schedule, including the Infrastructure Management Plan (rescheduled from 5/20/26 to 9/4/26), thereby compressing the timeline available to complete the full M&O scope prior to Pilot starting on October 12, 2026. | M |

| Recommendations | Progress |
|---|---|
| • Establish explicit M&O readiness exit criteria aligned to UAT completion and pilot authorization, including verified completion of defined operational processes, documented results of operational simulations, confirmed staffing readiness, validated and reliable test outcomes, and evidence of effective governance execution. | Not Started |
| • Confirm that ServiceNow roles, groups, and access management processes are fully defined, provisioned, and tested prior to UAT exit. This includes validating role-based access for DHS and ASI operational staff and group ownership and approval processes. | In Process |
| • Confirm scenario-based operational simulations as part of UAT, which should cover from ticket initiation in ServiceNow, change approvals, cross team handoffs (help desk, infrastructure, security, vendor escalation), and Secure Enclave operational response scenarios. | In Process |
| • Establish formal documentation and executive confirmation of end-to-end M&O roles and responsibilities, with particular emphasis on Secure Enclave support, incident ownership, escalation paths, change authority, and access administration across DHS and vendor teams. | In Process |
| • Survey the BES user community to confirm readiness for pilot to identify enhanced or new user training needs. | New |

# IV&V Findings and Recommendations – 7

## System Design

| # | Key Findings | Criticality Rating |
|---|---|---|
| 73 | **Risk – The planned BES infrastructure is complex, which could be difficult to implement and maintain, and could lead to schedule/cost impacts.**<br>At the start of the reporting period, UAT was stopped by unexpected server restarts that resulted in a Role-Based Access Control (RBAC) database outage issue. The ASI immediately engaged Oracle and troubleshooting isolated the issue to a server hardware problem. On May 27th, Oracle moved the database to a new physical server, and the ASI had not observed an unexpected restart of the server by the end of the reporting period.<br>The ASI reported that the RBAC database was the production database, and this is also used by UAT. IV&V will assess this shared use of the RBAC database and any potential impacts to the BES infrastructure and users.<br>The Infrastructure Management Plan was planned to be delivered to DHS on April 21,2026 and is now pushed to Mid-September. IV&V is concerned that this delivery date is too close to the Pilot start of October 12, 2026, and does not provide adequate time to make changes to the infrastructure management process and documentation if updates are required for the Operations team. | L |

| Recommendations | Progress |
|---|---|
| • ASI develop a process to closely monitor cloud and other product changes (software updates/new releases), manage changes, and regression test once updates are applied. | In Process |
| • The project team work to establish strong governance over the utilization and maintenance of various tools/components. | In Process |
| • ASI allot time in the schedule to conduct proof of concepts to assure infrastructure components work as expected. | In Process |
| • ASI maintain a detailed schedule for infrastructure tasks to avoid unexpected delays that could delay project milestones and the critical path. | In Process |

# IV&V Findings and Recommendations – 8

## Configuration and Development

| # | Key Findings | Criticality Rating |
|---|---|---|
| 70 | **Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution.**<br>The Configuration Management Plan, initially deferred to April 20 during the April reporting period, is now scheduled for delivery to DHS on September 4, 2026, in accordance with the latest M&O schedule. Any further delays may affect final M&O readiness testing prior to Pilot, since this plan should be utilized to upgrade, maintain and apply fixes to the test, training and production environments. | M |

| Recommendations | Progress |
|---|---|
| • ASI adhere to plans for configuration management as documented in BI-6 DDI Plan, Section 5.2 and clarify details and/or any changes with DHS. | In Process |
| • ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track. | In Process |
| • ASI validates that processes are in place to transition from DDI to the M&O team to manage configuration. | New |

# IV&V Findings and Recommendations – 9

## Testing

| # | Key Findings | Criticality Rating |
|---|---|---|
| 83 | **Issue – Gaps in test coverage and slower-than-expected progress in testing may result in schedule delays if subsequent test phases uncover a higher volume of defects and user feedback than initially anticipated.**<br>UAT testing remains on track, with core areas progressing; however, high severity defects continue to concentrate in batch processing, converted case handling, and business rule inconsistencies. New defects impacting previously working functionality have been identified in the UI workflows functionality and data handling, indicating potential instability in baseline functionality and regression testing coverage.<br>Access to the DHS Enterprise Document Management (EDM) solution was granted to the UAT Test Team, with EDM access for supporting components (Secure Enclave, Audit Log, Case Activity History) targeted for late June 2026. The delayed availability may compress the timeline for completing audit and security validations.<br>The ASI has completed the remaining automated regression test coverage from the prior SIT and is actively automating tests for the R0.14 Change Requests (CRs); continued evidence of passing regression results in lower environments will be important to support validation of both existing and newly introduced functionality. |  |

| Recommendations | Progress |
|---|---|
| • ASI to assess whether strengthened merge discipline and enhanced code reviews are associated with a measurable reduction in reintroduced defects over this SIT cycle. | In Progress |
| • ASI should integrate remaining SIT-related Change Requests (CRs) and upcoming completed CRs into the automated regression suite as early as possible to ensure impacted areas are covered. | Not Started |

# IV&V Findings and Recommendations – 10

## Security and Privacy

| # | Key Findings | Criticality Rating |
|---|---|---|
| 106 | **Risk – Critical and high vulnerability and configuration scan findings are not remediated within the documented timeframes, potentially impacting the project schedule and causing delays.**<br>As of May 31st, 2026, BES had 31 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 14 critical findings were within the timeframe. BES had 119 high-rated findings in an open state outside the 30-day remediation timeframe, and 15 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 10 critical and 31 high findings from 2024 remain deferred and are part of Oracle Cloud Infrastructure, which Oracle is responsible for patching quarterly. As of the end of May 2026, Oracle will deliver a Critical Security Patch Update (CSPU) monthly. Previously, these patches were released quarterly in a production-ready state. | M |

| Recommendations | Progress |
|---|---|
| • IV&V recommends that the Security Team enhance its Vulnerability Assessment and Prioritization Program to strengthen the agency's ability to manage cyber risk. A key component of this program is the reclassification of vendor-provided vulnerability ratings based on the agency's mission, operational environment, and the criticality of each affected system. This ensures that remediation priorities reflect the agency's unique risk exposure rather than generic severity scores. | In Progress |

# IV&V Findings and Recommendations – 11

## Requirements Analysis & Management

| # | Key Findings | Criticality Rating |
|---|---|---|
| 94 | **Risk – The lack of an effective way to validate BES requirements could lead to project delays and unfulfilled user needs if DHS later identifies unmet contractual requirements.**<br>At the final Change Control Meeting (CCB) for May on 5/27/2026, the ASI reported progress on confirming which contractual requirement have been met. Additionally, the ASI plans to provide information to IV&V on missing change control documentation by the end of June 2026. These issues will need to be resolved to allow DHS and IV&V to validate the disposition of all requirements prior to Pilot. | M |

| Recommendations | Progress |
|---|---|
| • Develop a document that provides DHS with a feasible and effective way to map contract requirements to passed test cases, and, per the BI-19 (Complete and Final Test Plan),"Maps the implementation, functional and technical requirements to the test cases and test scripts". | In Process |
| • Ensure test scripts thoroughly and comprehensively test the system to assure each requirement is met. | In Process |
| • Develop a deliverable that provides an audit trail for changes to the requirements from the contract such as obsoleted requirements, when that decision was made, and the change requests. | In Process |
| • Weekly reporting on clean-up efforts in JIRA regarding incorrect statuses of epics, use case, and requirements. | In Process |

# IV&V Findings and Recommendations – 12

## Requirements Analysis & Management

| # | Finding | Category |
|---|---|---|
| 108 | **Issue - Unplanned federally mandated system requirements could lead to project delays and increase the project budget.**<br>No new federally mandated requirements or concerns were raised in this reporting period. | L |

| Recommendations | Progress |
|---|---|
| • Pursue all communication channels that could provide early, and validated, information on possible requirements being sent out to the States. | In Process |

# IV&V Findings and Recommendations – 13

## OCM and Knowledge Transfer

| # | Finding | Category |
|---|---|---|
| 111 | **Risk – Insufficient Organizational Change Management (OCM) Planning and Execution Increases Risk to BES User Adoption and Deployment Success**<br>A survey was distributed to DHS Change Champions (over 40 employees), addressing a broad set of BES-related topics, including system access and login, usability and user experience, and technical performance and stability. While only 15 people responded, the feedback received was constructive and provides insight to strengthen readiness activities ahead of the October Pilot. During a subsequent discussion with the Change Champions, DHS leadership underscored the importance of increasing engagement and ensuring staff are allocated sufficient time to become familiar with the BES system prior to Pilot. | M |

| Recommendations | Progress |
|---|---|
| • Develop and maintain a detailed OCM activity schedule that is integrated with the overall BES master schedule, including testing, training, pilot, and go live phases. | In Process |
| • Identify key OCM artifacts (e.g., change impact assessments, communications plans, stakeholder engagement plans, readiness assessments, adoption metrics) and ensure they are produced, reviewed, and actively used to guide decision-making. | In Process |
| • Establish measurable OCM performance indicators and provide regular status reporting to DHS leadership to support early identification of readiness gaps and corrective action. | In Process |
| • Provide user training that shows direct correlation between how users currently perform work in HAWI and how they will perform the same work in BES. | New/ In Process |
| • Dedicate DHS staff time on readiness activities, including BES training and sandbox use. | New/ In Process |

# IV&V Status

# IV&V Engagement Status

| IV&V Engagement Status | | | | |
|---|---|---|---|---|
| **IV&V Engagement Area** | **Mar** | **Apr** | **May** | **Comments** |
| IV&V Budget |  |  |  | |
| IV&V Schedule |  |  |  | |
| IV&V Deliverables |  |  |  | PCG submitted the final April IV&V Monthly Status Report. |
| IV&V Staffing |  |  |  | |
| IV&V Scope |  |  |  | |

| Engagement Status Legend | | |
|---|---|---|
|  The engagement area is within acceptable parameters. |  The engagement area is somewhat outside acceptable parameters. |  The engagement area poses a significant risk to the IV&V project quality and requires immediate attention. |

# IV&V Activities

- IV&V activities in the May reporting period:
  - Completed – April Monthly Status Report
  - Ongoing – Review the BES Project Artifacts and Deliverables
  - Ongoing – Attend BES Project meetings (see Additional Inputs pages for details)
  - Ongoing – Review available ASI contracts and contract amendment documentation
- Planned IV&V activities for the June reporting period:
  - Ongoing – Observe BES Design and Development sessions as scheduled
  - Ongoing – Observe Bi-Weekly Project Status meetings
  - Ongoing – Observe Weekly Architecture meetings
  - Ongoing – Observe Weekly Security meetings
  - Ongoing – Monthly IV&V findings meetings with the ASI
  - Ongoing – Monthly IV&V Draft Report Review with DHS, ETS, and ASI
  - Ongoing – Participate in Bi-Weekly DHS and IV&V Touch Base meetings
  - Ongoing – Review BES artifacts and deliverables

# Deliverables Reviewed

| Deliverable Name | Deliverable Date | Version |
|---|---|---|
| BI-05 Project Schedule | 05/06/2026, 05/14/2026, 05/20/2026, 05/28/2026 | N/A |
| BI-02 Project Status Report | 05/06/2026, 05/13/2026, 05/20/2026, 05/27/2026 | N/A |
| M&O Change Management Plan | 5/26/2026 | 1.0 |
| M&O Turnover Management Plan | 5/26/2026 | 1.0 |

# Additional Inputs – Artifacts

| Artifact Name | Artifact Date | Version |
|---|---|---|
| FNS Handbook 901 | 01/2020 | V2.4 |
| NIST Special Publication 800-53 Security and Privacy Controls for Information Systems and Organizations | 12/20/2020 | Rev.5 |
| R0.13 SIT Defect Dashboard | N/A | N/A |
| Interface Dashboard – Confluence page | N/A | N/A |
| Jira Requirements Details | N/A | N/A |
| Jira Testing Lists | N/A | N/A |
| BES R0.13 System Testing Results - CRs and Pending Epics | N/A | N/A |
| BES R0.13 System Testing Results - Core | N/A | N/A |
| Batch Defect Dashboard | N/A | N/A |
| Reporting Defect Dashboard | N/A | N/A |

# Additional Inputs

## Meetings and/or Sessions Attended/Observed:

1. IV&V Team Meeting – 5/4/2026, 5/11/2026, 5/18/2026, 5/28/2026
2. IV&V/ASI January Pre-draft Review – 5/6/2026
3. HI DHS BES April Draft IV&V Report Review – 5/14/2026
4. Bi-Weekly DHS and IV&V Touch Base – 5/19/2026, 5/26/2026
6. Weekly BES Infrastructure meeting – 5/1/2026, 5/8/2026, 5/15/2026, 5/22/2026, 5/29/2026
7. Weekly Client BES 2023 Project Status Meeting – 5/13/2026, 5/27/2026
8. Security Touchpoint – 5/6/2026, 5/13/2026, 5/20/2026, 5/27/2026
9. (External) Bi-weekly BES CCB Meeting – 5/13/2026, 5/27/2026
10. (External) C!A Current Monthly Checkpoint – 5/5/2026
11. (External) BES M&O Working Group – 5/6/2026, 5/13/2026, 5/20/2026, 5/27/2026
12. (External) BES Readiness/BI-29 Updates – 5/4/2026, 5/18/2026
13. eWorld/IV&V Mid-Month Check-in – 5/21/2026
14. (External) BES: FNS Connect – 5/7/2026, 5/14.2026, 5/21/2026
15. (External) Daily UAT Touchpoint Meeting – Daily Meeting every workday
16. RE: BES M&O Documents to Review - Softphone/Help Desk Process Guide – 5/21/2026
17. JAD Session 1 for CR2026-049 BES Missing Screen Displays – 5/22/2026
18. (External) Training Status Updates – 5/14/2026, 5/28/2026
19. (External) BES Mass Change Planning Meeting – 5/11/2026
20. (External) Training Status Updates – 5/14/2026
21. (External) JAD Day 2 CR2026-051 BES Expedited SNAP Updates – 5/1/2026

# Appendices

# Appendix A – IV&V Criticality Ratings

| Criticality Rating | Definition |
|---|---|
| H | A high rating is assigned if there is a possibility of substantial impact to product quality, scope, cost, or schedule. A major disruption is likely, and the consequences would be unacceptable. A different approach is required. Mitigation strategies should be evaluated and acted upon immediately. |
| M | A medium rating is assigned if there is a possibility of moderate impact to product quality, scope, cost, or schedule. Some disruption is likely, and a different approach may be required. Mitigation strategies should be evaluated and implemented as soon as feasible. |
| L | A low rating is assigned if there is a possibility of a slight impact on product quality, scope, cost, or schedule. Minimal disruption is likely, and some oversight is most likely needed to ensure that the risk remains low. Mitigation strategies should be considered for implementation when possible. |

# Appendix B – Findings Log

- The complete Findings Log for the BES Project is provided in a separate file.

# Appendix C – Acronyms and Glossary – 1

| Acronym | Definition |
|---|---|
| APD | Advance Planning Document |
| ASI | Application System Integrator |
| BES | Benefits Eligibility Solution |
| CCWIS | Comprehensive Child Welfare Information System |
| CM | Configuration Management |
| CMMI | Capability Maturity Model Integration |
| CMS | Center for Medicare and Medicaid Services |
| CR | Change Request |
| DDI | Design, Development and Implementation |
| DED | Deliverable Expectation Document |
| DHS | Hawaii Department of Human Services |
| DLV | Deliverable |
| E&E | Eligibility and Enrollment |
| EA | Enterprise Architecture |
| ECM | Enterprise Content Management (FileNet and DataCap) |
| ESI | Enterprise System Integrator (Platform Vendor) |
| ETS | State of Hawaii Office of Enterprise Technology Services |
| FIPS | Federal Information Processing Standard |
| HIPAA | Health Information Portability and Accountability Act of 1996 |
| IDM | Identity and Access Management (from KOLEA to State Hub) |
| IEEE | Institute of Electrical and Electronics Engineers |
| IES | Integrated Eligibility Solution |
| ITIL | Information Technology Infrastructure Library |

# Appendix C – Acronyms and Glossary – 2

| Acronym | Definition |
|---|---|
| IV&V | Independent Verification and Validation |
| KOLEA | Kauhale On-Line Eligibility Assistance |
| M&O | Maintenance & Operations |
| MEELC | Medicaid Eligibility and Enrollment Life Cycle |
| MEET | Medicaid Eligibility and Enrollment Toolkit |
| MOU | Memorandum of Understanding |
| MQD | Hawaii Department of Human Services MedQuest Division |
| NIST | National Institute of Standards and Technology |
| OE | Operating Environment |
| OIT | Department of Human Services Office of Information Technology |
| PIP | Performance/Process Improvement Plan |
| PMBOK® | Project Management Body of Knowledge |
| PMI | Project Management Institute |
| PMO | Project/Program Management Office |
| PMP | Project Management Plan |
| QA | Quality Assurance |
| QM | Quality Management |
| RFP | Request for Proposal |
| ROM | Rough Order of Magnitude |
| RMP | Requirements Management Plan |
| RTM | Requirements Traceability Matrix |
| SEI | Software Engineering Institute |
| SLA | Service-Level Agreement |
| SME | Subject Matter Expert |

# Appendix C – Acronyms and Glossary – 3

| Acronym | Definition |
|---|---|
| SOA | Service Oriented Architecture |
| SOW | Statement of Work, Scope of Work |
| VVP | Software Verification and Validation Plan |
| XLC | Expedited Life Cycle |

# Appendix D – Background Information

### Systems Modernization Project

The DHS Enterprise Program Roadmap includes contracting with three separate vendors with the following high-level scope:

- ESI or Platform Vendor – responsible for the shared technology and services required for multiple Application vendors to implement and support functionality that leverages the DHS Enterprise Platform.
- ASI or ASI Vendor – responsible for the DDI of the Benefits Eligibility Solution (BES Project) enhancing the currently implemented Medicaid E&E Solution (KOLEA) and providing support for the combined Solutions.
- CCWIS Vendor – responsible for the DDI of the CCWIS Solution to meet the needs of child welfare services and adult protective services (CCWIS Project) and providing support for the Solution.

### Systems Modernization IV&V Project

IV&V performs objective assessments of the design, development/configuration and implementation (DDI) of DHS' System Modernization Projects. DHS has identified three high-risk areas where IV&V services are required:

- Transition of M&O from DHS' incumbent vendor to the ESI and ASI vendors
- BES DDI
- CCWIS DDI

On the BES DDI Project, IV&V is responsible for:

- Evaluating efforts performed by the Project (processes, methods, activities) for consistency with federal requirements and industry best practices and standards
- Reviewing or validating the work effort performed and deliverables produced by the ASI vendor as well as that of DHS to ensure alignment with project requirements
- Anticipating project risks, monitoring project issues and risks, and recommending potential risk mitigation strategies and issue resolutions throughout the Project's life cycle
- Developing and providing independent project oversight reports to DHS, ASI vendors, State of Hawaii Office of Enterprise Technology Services (ETS) and DHS' Federal partners

# Appendix D – Background Information – 1

### What is Independent Verification and Validation (IV&V)?

- Oversight by an independent third party that assesses the Project against industry standards to provide an unbiased view to stakeholders
- The goal of IV&V is to help the State get the solution they want based on requirements and have it built according to best practices
- IV&V helps improve design visibility and traceability and identifies (potential) problems early
- IV&V objectively identifies risks and communicates to project leadership for risk management

### PCG's Eclipse IV&V® Technical Assessment Methodology

- Consists of a 4-part process made up of the following areas:
  1. **Discovery** – Discovery consists of reviewing documentation, work products and deliverables, interviewing project team members, and determining applicable standards, best practices and tools.
  2. **Research and Analysis** – Research and analysis is conducted in order to form an objective opinion.
  3. **Clarification** – Clarification from project team members is sought to ensure agreement and concurrence of facts between the State, the Vendor, and PCG.
  4. **Delivery of Findings** – Findings, observations, and risk assessments are documented in this monthly report and the accompanying Findings and Recommendations log. These documents are then shared with project leadership on both the State and Vendor side for them to consider and take appropriate action on.

### IV&V Assessment Categories for the BES Project

- Project Management
- Requirements Analysis & Management
- System Design
- Configuration and Development
- Integration and Interface Management
- Data Management and Conversion
- Security and Privacy
- Testing
- OCM and Knowledge Transfer
- Pilot Test Deployment
- Deployment

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| ID | Title | Reporter | Finding Type | Identified Date | Category | Observation | Significance | Recommendation | Event Horizon | Impact | Probability | Analyst Priority | Finding Status | Status Update | Client Comments | Vendor Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 116 | Batch job stability and performance issues may impact UAT completeness and Pilot readiness | Ho, Justin | Concern | 5/28/2026 | Configuration and Development | Batch job failures and processing errors observed during UAT raise concerns regarding the stability and reliability of overall batch processing. Given the critical role of batch jobs in supporting eligibility processing, case management, and other core workflows, continued instability may impact completion of end-to-end testing and introduce risk to Pilot readiness if not fully resolved. Additionally, the current daily UAT batch summary report provides only job execution status (success/failure) and lacks key operational metrics (e.g., records processed, error/skipped counts), limiting the client's ability to confirm that batch jobs are producing accurate business results during UAT. Per DHS's request, the ASI is currently working on a report to address these gaps. | Industry standards indicate that consistently executing batch jobs are critical to large-scale eligibility systems, as they support core system functions such as eligibility determination, benefit issuance, case updates, and generation of required notices and reports. Inconsistent or failed batch processing can result on incorrect system outcomes, including missed or delayed benefits, inaccurate case statuses, and lack of required client communication. | | UAT | 3 | 3 | Med | Open | 5/31/26: IVV is working with the ASI to further understand the design and execution of batch processes, including batch execution reporting, restartability logic, architectural design, and file processing. It remains unclear whether batch processes can operate reliably at production scale. Additionally, standard operating procedures for batch support are still being finalized, with gaps remaining in batch runbooks and M&O documentation. Collectively, these factors introduce uncertainty regarding the operational readiness of batch processing. | | 6/10/2026 We know this is a preliminary concern but based on your observation information, can you provide more evidence or information regarding the failed batch job failures to help substantiate this concern? Per our perspective, UAT batch jobs are getting processed successfully as expected and defects are predictable per the UAT phase. |
| 115 | Partial validation of report data accuracy and logic prior to go-live may result in additional validation and rework during the Pilot Period. | Mezina, Jekaterina | Finding - Risk | 5/28/2026 | Testing | When DHS raised project risk #73 on April 30, 2026, during UAT, IVV observed that the ASI confirmed that report testing during SIT mostly validated formatting, visual presentation, and report job execution. This included checking if reports could be generated, accessed, viewed, downloaded, and printed. However, there is limited evidence that the ASI systematically validated the accuracy of the underlying data and report logic. The ASI stated that their testing was limited by the lack of documented report requirements. The required level of report validation in UAT exceeds the bandwidth of DHS testers to complete. To address this gap, the ASI has proposed establishing a recurring report working group to prioritize validation activities for critical Day One reports and triage outstanding UAT reports defects. This effort is intended to provide a structured approach to addressing the most time-sensitive reporting needs ahead of Pilot, pending DHS alignment and meeting scheduling. A project issue was opened in January 2024 (#59) regarding concerns by the ASI in obtaining information needed from DHS to confirm requirements for reports. This issue was closed in March 2024 by the ASI reports project manager with all mitigation resolved so that the ASI could collect requirements for reports. IVV did not observe any additional concerns about report requirements until DHS raised project issue #73 during UAT. | While prioritizing Day One reporting readiness supports immediate operational needs, deferring comprehensive validation across the full report inventory introduces risk. Report validation can uncover defects in the underlying system processing that may not be identified through other testing activities. As a result, incomplete validation of report logic and accuracy increases the likelihood that data accuracy or processing issues remain undetected. Incomplete validation now will require additional staff attention and effort during the pilot period to identify and remediate defects, potentially increasing demand on project resources during early operations, when focus should be on system stabilization and high-priority issues. While reports do not directly modify system data, insufficient validation of report logic may reduce confidence in reported outputs and delay identification of underlying system defects. | Establish a structured reporting working session to confirm Day One report scope, define expected outputs, and validate report data accuracy and logic against source data for priority reports, with focus on those impacting core eligibility and benefit outcomes. Define a consistent approach, clear ownership, and measurable tracking for report validation to ensure reporting readiness is transparent and fully verified prior to Pilot. | Now | 3 | 3 | Med | Open | | | 6/10/2026 The observation does not explain why the ASI did not validate the accuracy of the underlying data and report logic during SIT; specifically, the ASI was not provided with documented report requirements and consequently had our hands tied in what we could test in SIT. As a reminder, we originally had a project issue when developing the reports - 59 - BES Reporting Issue - Project Management Office - Confluence and a current issue 73 - BES UAT Reports Testing and Validation - |
| 114 | Incomplete BES M&O operational processes and procedures prior to UAT and Pilot may leave the project unready for statewide implementation. | Molina, Brad | Finding - Risk | 4/2/2026 | Project Management | ServiceNow tooling and technical configurations are progressing, key M&O operational elements remain immature or unresolved. Specifically: • Roles and responsibilities for Secure Enclave support - particularly between DHS and the vendor are not clearly documented or confirmed. • Core M&O artifacts (e.g., M&O Plan, Infrastructure Management Plan, Secure Enclave support documentation) are under development or not yet fully reviewed. • Operational governance for change management remains split across tools without integration, limiting end-to-end visibility. • UAT planning emphasizes system functionality testing, with limited evidence of full end-to-end operational process simulation (e.g., incident-to-change workflows, Change Advisory Board (CAB) decision-making). • ServiceNow access and group management processes may not be available or tested prior to UAT. • Notification strategies, knowledge management ownership, and defect readiness criteria lack full definition or validation. • Training readiness is tightly coupled to UAT stability, compressing the window to address operational gaps before pilot. Collectively, these conditions indicate that process readiness is lagging behind tool implementation, increasing reliance on assumptions and post-go-live stabilization rather than validated operational capability. | M&O readiness is critical to sustaining BES operations once the system enters pilot and production and is planned to be fully tested during the UAT Phase. Without fully defined, documented, and validated operational processes: • Incidents may experience delayed triage and resolution due to unclear ownership and escalation paths. • Change and access management may be inconsistently executed, increasing operational, security, and audit risk. • Knowledge gaps may reduce help desk effectiveness and increase operational burden. • DHS and vendor teams may rely on undocumented or manual workarounds during early operations. • Operational issues may surface post-go-live, when remediation is more costly and disruptive. Failure to address these gaps prior to UAT exit and pilot increases the likelihood of operational instability, service degradation, and compliance exposure during early BES operations, undermining the intended benefits of the M&O transition. | - Define explicit M&O readiness exit criteria tied to UAT completion and pilot authorization. Criteria should include documented process completion, evidence of operational simulations, confirmed staffing readiness, accurate and valid test results, and validated governance execution - Confirm that ServiceNow roles, groups, and access management processes are fully defined, provisioned, and tested prior to UAT exit. This includes validating role-based access for DHS and ASI operational staff and group ownership and approval processes - Confirm scenario based operational simulations as part of UAT, which should cover from initiation in ServiceNow, change approvals, cross team handoffs (help desk, infrastructure, security, vendor escalation), and Secure Enclave operational response scenarios. - Establish formal documentation and executive confirmation of end to end M&O roles and responsibilities, with particular emphasis on Secure Enclave support, incident ownership, escalation paths, change authority, and access administration across DHS and vendor teams. - Survey the BES user community to confirm readiness for pilot to identify enhanced or new user training needs. | Now | 3 | 3 | Med | Open | 5/31/2026 - To mitigate delays in completing documentation tasks required for the operations team, the ASI has increased the volume of documents submitted to DHS and IV&V for review and conducted follow-up discussions to address and resolve feedback. Despite these efforts, key activities have experienced further delays in the latest M&O schedule, including the Infrastructure Management Plan (rescheduled from 5/20/26 to 9/4/26), thereby compressing the timeline available to complete the full M&O scope prior to Pilot starting on October 12, 2026. 4/30/2026 - The project team completed the first UAT cycle for ServiceNow, the ticketing system for BES M&O work, during the reporting month, with good collaboration between the ASI and DHS to work though initial ramp up and defect management. With the focus on this UAT cycle, many of the open tasks on the M&O schedule have had their finish dates delayed; some of them significantly (106 days for "Request BESSD SN data refresh from Pacxa/Speridian") per the schedule published on 4/24. The scope of work that needs to be completed prior to Pilot, including ServiceNow data catalog work, completion of governance artifacts (IBM-04, Release Management Plan, etc.), Help desk documentation, and related job aids could put Pilot readiness at risk. Therefore, IV&V is moving this finding from a preliminary concern to a risk. | | 5/12/2026 Per eWorld Executive recommendation, please change all references of M&O to "Interim M&O" where appropriate. The current work being done for M&O is in preparation of M&O and not the actual M&O. IV&V response - The ASI is engaged in M&O Planning for the BES Pilot. M&O support during Pilot is full production M&O. Yellow highlight: Typo - should be BM-04 M&O PlanRegarding the "finish dates delayed" reference, the current project schedule |
| 112 | Insufficient Time Travel environment preparation could lead to UAT execution and testing timelines | Ho, Justin | Concern | 3/31/2026 | Testing | UAT has begun, and it is unclear to IV&V if there is a plan for the management of the time travel environment, given the challenges experienced during the prior UAT phase. Key procedural details including request handling, batch issue coordination, and reset/recovery processes remain undefined and are essential to supporting timely tester activity during UAT. | Industry best practices emphasize early and proactive planning for complex test environments, particularly those involving time-dependent data and coordinated batch processing. Given prior UAT challenges (e.g. misalignment on data refresh activities, delays in batch job issue resolution) and the limited schedule buffer associated with the final UAT, the lack of a defined management plan increases the risk for coordination delays and incomplete execution of planned UAT scenarios. | • Establish a time travel UAT management plan that includes governance, approvals, and coordination procedures • Define batch handling and reset/recovery procedures to ensure timely issue resolution and minimizing UAT disruption • Consider for future releases using a scheduling mechanism that includes real-time notifications and linkage to a system of control for traceability | UAT | 3 | 3 | Med | Open | 5/31/26: The ASI has provided initial evidence outlining a high-level management approach for the time travel environment to be used during UAT and is expected to provide additional supporting details next month. While testing activity related to this environment has been limited to date, and the client has not expressed concerns with the current approach, IVV will continue to monitor the performance and management of the time travel environment as UAT progresses. 4/30/26: IV&V has not received evidence from the ASI regarding the planning and management approach for the time travel environment during UAT. The Time Travel environment is a specialized environment that simulates system behavior at different points in time, to validate date-dependent functionality such as eligibility and renewals (e.g., six months after benefits are approved and an EBT card is issued). While time travel-specific testing activity has not yet begun, time travel tests are planned and increased usage is anticipated. Without defined coordination and execution procedures in place, the project may face disruption to UAT execution, comparable to what was encountered in previous UAT cycles. | | |
| 111 | Insufficient Organizational Change Management (OCM) Planning and Execution Increases Risk to BES User Adoption and Deployment Success | Molina, Brad | Finding - Risk | 2/1/2026 | OCM and Knowledge Transfer | Observation: DHS and IV&V have observed that the ASI has not demonstrated sufficient progress in fully defining, planning, and implementing Organizational Change Management (OCM) for the BES Project. While OCM has been acknowledged as a critical success factor and discussions regarding strategy and approach have occurred, key foundational OCM artifacts and execution mechanisms remain incomplete or not yet available for DHS and IV&V review. Specifically, IV&V notes that: • A finalized and DHS-approved OCM strategy and implementation plan has not been fully established or baselined. • A detailed OCM activity schedule, aligned to BES testing, pilot, and go live milestones, has not been consistently available. • Roles, responsibilities, and ownership between DHS and the ASI for OCM execution lack sufficient clarity to support effective planning and resourcing. • Key OCM deliverables (e.g., communications plans, stakeholder readiness assessments, change impact analyses, and user adoption metrics) have not been fully defined or demonstrated in execution. As a result, DHS and IV&V have limited visibility into how change readiness, user adoption, and organizational preparedness will be systematically achieved in advance of BES pilot and statewide deployment. | OCM is a critical component of large-scale system modernization efforts such as BES, particularly given the breadth of business process change, the number of impacted stakeholders, and the dependency on end-user adoption for operational success. Without a clearly defined and actively executed OCM framework, the project risks focusing primarily on technical readiness while underestimating the people, process, and behavioral changes required for successful implementation. The absence of a mature and executable OCM approach limits DHS's ability to: • Proactively prepare stakeholders and end users for new processes and system behaviors. • Identify and mitigate resistance to change. • Measure organizational readiness prior to key deployment milestones. • Ensure consistent and coordinated messaging between training, communications, and operational leadership. | OPEN - Develop and maintain a detailed OCM activity schedule that is integrated with the overall BES master schedule, including testing, training, pilot, and go live phases - Identify key OCM artifacts (e.g., change impact assessments, communications plans, stakeholder engagement plans, readiness assessments, adoption metrics) and ensure they are produced, reviewed, and actively used to guide decision-making. - Establish measurable OCM performance indicators and provide regular status reporting to DHS leadership to support early identification of readiness gaps and corrective action. - Provide user training that shows direct correlation between how users currently perform work in HAWI and how they will perform the same work in BES. - Dedicate DHS staff time on readiness activities, including BES training and sandbox use. Completed - Ensure a comprehensive OCM strategy and implementation plan is finalized, approved by DHS, and baselined. - Clearly define and document DHS and ASI OCM roles, responsibilities, decision authority, and handoffs to support effective execution and accountability. | now | 4 | 2 | Med | Open | 5/30/2026 - A survey was distributed to DHS Change Champions (over 40 employees), addressing a broad set of BES-related topics, including system access and login, usability and user experience, and technical performance and stability. While only 15 people responded, the feedback received was constructive and provides insight to strengthen readiness activities ahead of the October Pilot. During a subsequent discussion with the Change Champions, DHS leadership underscored the importance of increasing engagement and ensuring staff are allocated sufficient time to become familiar with the BES system prior to Pilot. 4/30/2026 - IVV has observed growing momentum regarding OCM/Readiness for the project, resulting from strong collaboration between DHS and the ASI. Indication of progress on DHS readiness for Pilot can be seen via the engagement with Change Champions, both in current meetings and clarification that will come from the Change Champions readiness surveys being developed. This level of progress should only increase moving forward to allow DHS leadership to be confident that organization prepared for the BES pilot and eventual Statewide implementation. | | 6/10/2026 New Recommendation – e World is not responsible for identifying differences between HAWI and BES; this should be a joint effort with SDO participation. DHS has already developed a document comparing HAWI screens to corresponding BES screens, which serves as an existing artifact. In addition, a "flowchart" document—similar to what EWs are familiar with in HAWI—is currently in development. The training team is also identifying specific |

| ID | Title | Reporter | Finding Type | Identified Date | Category | Observation | Significance | Recommendation | Event Horizon | Impact | Probability | Analyst Priority | Finding Status | Status Update | Client Comments | Vendor Comments |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| 108 | Unplanned federally mandated system requirements could lead to project delays and increase the project budget. | Molina, Brad | Finding - Issue | 9/5/2025 | Requirements Analysis & Management | As part of the OBBBA, there are several new SNAP requirements of which some are awaiting FNS implementation guidance. Examples include: new conditions for work requirements, prior ABAWD waivers, new exemption classes, and standard utility deductions. The project is currently in the Systems Integration Test (SIT) phase, and the new requirements have yet to be fully defined, developed, and tested. | In 2024, DHS and the ASI agreed to transition from an "Agile" to a "Waterfall" software development life cycle to reduce the risk of future schedule delays. The Waterfall approach requires all requirements to move through the development as a single set of program code, processes, and procedures, ensuring that functionality is tested holistically. Once testing is complete, DHS can be confident that the base system is stable, performs as intended, and that functional interactions operate correctly. As the BES system is currently in the testing phase, introducing new requirements at this stage could create several challenges for the BES Pilot Release: Rework – Functionality previously tested may need to be retested as new code is introduced. Training materials, content, and operational processes may also require updates to reflect the changes; Schedule Delays – If new requirements are added, the project team may defer testing of existing functionality until the new functionality is developed and ready, potentially delaying the Pilot and Statewide Implementation start dates; Resources – Additional effort may be required to define, develop, and test new requirements. This could necessitate more ASI and DHS staff support, as well as technical adjustments (e.g., keeping development environments active longer than originally planned). | Open - Pursue all communication channels that could provide early, and validated, information on possible requirements being sent out to the States. - Closed - Build in contingency in schedule to account for possible new requirements being introduced that must be part of the initial implementation of BES. | now | 3 | 2 | Med | Open | 05/31/2026 - No new federally mandated requirements or concerns were raised in this reporting period. 04/30/2026 - No new federally mandated requirements or concerns were raised this reporting. 03/31/2026 - IV&V is not aware of any new federally mandated requirements or concerns were raised this reporting period that could impact the current BES schedule. 2/28/2026 -No new Federal requirements were introduced in the reporting period, but discussions during a call between DHS and FNS did indicate some potential risk in this area. The BES Implementation will carry over into Federal Fiscal Year (FFY) 2027. FNS stated they are not yet approving any federal funds for FFY 2027, which begins October 1, 2026. This is not to say they won't, but at this time they cannot commit to it. DHS and FNS do have monthly meetings where this can be discussed and clarified for any possible impact to the project. 12/31/2025 - The State of Hawaii is part of a lawsuit, along with 20 other states and the District of Columbia, challenging USDA guidance implementing HR 1 requirements, including timing to implement these changes. One action the ASI is taking to mitigate this risk includes contingency in the revised DDI schedule to account for possible new requirements being introduced that must be in place prior to implementation of BES solution. Any revisions to overall timing of DDI schedule may also require updates to impacted tasks in the M&O schedule. 11/30/2025 - The Food and Nutrition Services (FNS) organization is back to working with the government shutdown ending and clarification on the SNAP requirement changes continues to be an issue. Without clear guidance from FNS for the requirements needed to finalize the Change Requests (CRs) there may be additional schedule delays and increased project costs. 10/30/2025 - The Food and Nutrition Services (FNS) organization is now unable to provide some interpretations on the required | | |
| 106 | Critical and high vulnerability and configuration scan findings are not remediated within the documented timeframes. | Heath, Dustin | Finding - Risk | 2/28/2025 | Security and Privacy | The BES system does not currently remediate critical vulnerabilities and compliance issues within 15 days, and high vulnerabilities are not remediated within 30 days as required by the BES Vulnerability Management Procedures document. | The BES system faces elevated cybersecurity, operational, financial, and compliance risks if vulnerabilities are not remediated within the required timeframe. Prompt corrective actions are necessary to ensure timely vulnerability resolution and safeguard the BES system environment prior to going live. Un-remediated critical and high Nessus compliance scans can significantly hinder system development efforts by introducing security risks, compliance failures, and operational roadblocks. This lack of remediation of system configuration findings increases technical debt, disrupts development workflows, and diverts resources from core project objectives. | OPEN IV&V recommends that the Security Team enhance its Vulnerability Assessment and Prioritization Program to strengthen the agency's ability to manage cyber risk. A key component of this program is the reclassification of vendor-provided vulnerability ratings based on the agency's mission, operational environment, and the criticality of each affected system. This ensures that remediation priorities reflect the agency's unique risk exposure rather than generic severity scores. COMPLETE Update the BES Vulnerability Management Procedures document with the Jira ticketing process and workflow from vulnerability and configuration scan remediation with who owns each step. Rate Configuration scan result failures and how they impact the security of the BES system (Critical, High, Medium, and Low) instead of simple pass/failure results. In January 2025, 82 critical and High-finding POAMs were listed due to the Tenable configuration scan results. The POAMs for configuration scans are now listed as "failed"; due to the binary nature of the scan engine and does not rate the criticality of the system configuration on the business operation of how the hosts are used. Implement an escalation process to involve senior leadership if deadlines are missed. | 30 days prior to the IRS assessment or the next third-party assessment. | 3 | 3 | Med | Open | 5/31/2026– As of May 31st, 2026, BES had 31 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 14 critical findings were within the timeframe. BES had 119 high-rated findings in an open state outside the 30-day remediation timeframe, and 15 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 10 critical and 31 high findings from 2024 remain deferred and are part of Oracle Cloud Infrastructure, which Oracle is responsible for patching quarterly. As of the end of May 2026, Oracle will deliver a Critical Security Patch Update (CSPU) monthly. Previously, these patches were released quarterly in a production-ready state. 4/30/2026– As of April 30th, 2026, BES had 26 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 6 critical findings were within the timeframe. BES had 117 high-rated findings in an open state outside the 30-day remediation timeframe, and 9 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 10 critical and 31 high findings from 2024 remain deferred and are part of Oracle Cloud Infrastructure, which Oracle is responsible for patching quarterly. 3/31/2026– As of March 31, 2026, BES had 32 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 5 critical findings were within the timeframe. BES had 118 high-rated findings in an open state outside the 30-day remediation timeframe, and 21 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 10 critical and 31 high findings from 2024 remain deferred and are part of Oracle Cloud Infrastructure, which Oracle is responsible for patching quarterly. Failing to fix serious security issues on time leaves systems increasingly exposed to attacks, raises the risk of outages and data breaches, and reflects underlying | | 9/12/2025<br>The number of critical/high issues being reported seem elevated compared to our numbers. It appears the numbers being reported include "deferred" along with "open". We distinguish between "open" and "deferred" because the "deferred" items are OCI vulnerabilities and thus not under our control to meet the target dates. This point is clarified at the end of the paragraph — however we have some concerns about reporting these items as "potentially impacting the project schedule and causing |
| 94 | The lack of an effective way to validate BES requirements could lead to project delays and unfulfilled user needs if DHS later identifies unmet contractual requirements. | Molina, Brad | Finding - Risk | 4/25/2024 | Requirements Analysis & Management | The Requirements Traceability Matrix (RTM) (BI-21) plays a vital role in ensuring the system's compliance with contractual commitments by associating each requirement with passed test case(s). However, the approved project schedule shows the RTM completed on 6/26/24, which falls after the Core SIT exit decision on 5/10/24. The ASI provided the BI-22a System Integrity Review Tool (SIRT) to DHS on April 26, 2024, but withdrew the deliverable due to DHS concerns. This BI-22a deliverable may help DHS validate requirements. | It is unclear to DHS and IVV how the ASI will trace requirement coverage for SIT completion. DHS may be unable to make an informed decision on SIT exit criteria. This could lead to DHS starting Final Acceptance Testing (FAT) and then realizing that not all requirements have been fully met, resulting in delays. | IN PROGRESS • Develop a document that provides DHS with a feasible and effective way to map contract requirements to passed test cases, and, per the BI-19 (Complete and Final Test Plan),"Maps the implementation, functional and technical requirements to the test cases and test scripts". • Ensure test scripts thoroughly and comprehensively test the system to assure each requirement has been fully met. • Develop a deliverable that provides an audit trail for changes to the requirements from the contract such as obsoleted requirements, when that decision was made, and the change requests. • Provide weekly updates about the clean-up efforts in JIRA regarding incorrect statuses of epics, use case, and requirements. Completed • Create a detailed plan outlining the timeline for completing the clean-up efforts for the requirements and describe the metrics that will be used to evaluate the final outcome. | 5/10/2024 | 3 | 3 | Med | Open | 5/31/2026 - At the final Change Control Meeting (CCB) for May on 5/27/2026, the ASI reported progress on confirming which contractual requirement have been met. Additionally, the ASI plans to provide information to IVV on missing change control documentation by the end of June 2026. These issues will need to be resolved to allow DHS and IVV to validate the disposition of all requirements prior to Pilot. 4/30/2028 - The Requirements Traceability Matrix (RTM) deliverable (BI-21) was sent to DHS on April 7, 2026, for review. DHS could not complete their validation of contractual requirements with this deliverable - with the largest gap being the inability to confirm if a requirement had been met by the BES solution. Additionally, IV&V was unable to confirm all updates to the requirements via approved methods (Decision logs, Controlled Correspondence), as some records were missing. These issues will need to be resolved so DHS and IV&V can validate that all requirements have been met prior to Pilot. 3/31/2026 - DHS and IVV continued to review the interim RTM provided by the ASI and provide comments and feedback. As of the last CCB meeting (3/18/2026), there remained requirements work to be completed (mapping, approval of requirement dispositions by both the ASI and DHS). The official version of the RTM is schedule to be delivered to DHS for their review on 4/1/2026. 2/28/2026 -In February, DHS reviewed the interim Requirements Traceability Matrix (delivered in January); however, the interim RTM remains incomplete and is not ready for DHS to use for validating requirements coverage. Several requirement mappings continue to require clarification or correction, and additional updates were requested. Non functional requirement traceability also remains outstanding. Finalizing a fully updated RTM will be necessary for DHS to confirm that all contractual requirements are accurately represented before | | 3/12/2026<br>Just a reminder that the actual start date for working on the RTM is 3/9/2026 and a submission to DHS on 4/1/2026. The interim work was to prepare us before the actual start date. Please consider a rewrite of this finding.<br><br>12/11/2025<br>Sorry, I don't have the recording or meeting notes but I thought I mentioned the interim RTM was an internal target date and not the date the deliverable was actually due and perhaps we should |
| 83 | Gaps in test coverage and slower-than-expected progress in testing may result in schedule delays if subsequent test phases uncover a higher volume of defects and user feedback than initially anticipated. | Ho, Justin | Finding - Issue | 6/2/2023 | Testing | After examining the Project's R11 QA Dashboards, R11 Traceability Dashboards, and Test Repository, gaps in testing coverage may exist and the progress of testing might be lagging. Concerning testing coverage, it appears that not all epics and use cases in R11 have associated test cases or are testing the correct use cases. In terms of progress, some test cases remain unexecuted, and not all defects have been resolved as the project commences System Integration Testing (SIT). The ASI has plans to complete the INT exit criteria by June 16, 2023, about 2 weeks after SIT begins. | Identifying defects early is vital for effective testing, as it is more efficient and cost-effective to address issues during the early testing stages. If there is slow progress or incomplete testing in the early stages, it can result in more defects leaking into subsequent testing phases, necessitating more extensive and rigorous testing efforts. Insufficient testing coverage or slower-than-anticipated progress throughout the project lifecycle increases the risk of encountering significant delays, extensions, or the introduction of defects into the production environment during the final testing stage, known as Final Acceptance Testing (FAT). | ONGOING -ASI should integrate remaining SIT-related Change Requests (CRs) and upcoming completed CRs into the automated regression suite as early as possible to ensure impacted areas are covered. -ASI to assess whether strengthened merge discipline and enhanced code reviews are associated with a measurable reduction in reopened and reintroduced defects over this SIT cycle. CLOSED -DHS to review the subset of functional SIT test cases currently being executed to confirm that coverage is sufficient to mitigate the risk of defects escaping into UAT. -ASI to continue to strengthen regression testing by retesting CR impacted modules and previously resolved defects to reduce the risk of reintroduced issues. -ASI test team provide a visual of progress of test case execution compared to current testing schedule. -ASI assesses the potential impact of the large number of unresolved defects on future development efforts, ensuring a more robust and efficient development process - ASI develop and implement a revised testing approach to improve the completeness and thoroughness of future testing cycles. - The ASI should determine the root cause of the failure to identify simple defects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT (Closed 4/30/2024) - DHS and ASI monitor INT/SIT closely for both breadth and depth of testing to ensure the system is adequately tested (Closed 10/30/2024) - ASI utilize the two-week FAT testing pause to address and resolve outstanding SIT defects and apply the fixes in the FAT environment, ensuring that these defects do not recur when FAT resumes, optimizing testing efficiency and reducing potential defect rediscovery. (Closed 10/30/2024) NOT COMPLETED - The Project team reviews the SIT exit criteria and revises them as needed to ensure UAT/FAT begins with the best system possible. (3/31/2024) - DHS should request that the ASI develop | UAT | 2 | 2 | Low | Open | 5/31/26: UAT testing remains on track, with core areas progressing; however, high severity defects continue to concentrate in batch processing, converted case handling, and business rule inconsistencies. New defects impacting previously working functionality have been identified in the UI workflows functionality and data handling, indicating potential instability in baseline functionality and regression testing coverage. Access to the DHS Enterprise Document Management (EDM) solution was granted to the UAT Test Team, with EDM access for supporting components (Secure Enclave, Audit Log, Case Activity History) targeted for late June 2026. The delayed availability may compress the timeline for completing audit and security validations. The ASI has completed the remaining automated regression test coverage from the prior SIT and is actively automating tests for the R0.14 Change Requests (CRs); continued evidence of passing regression results in lower environments will be important to support validation of both existing and newly introduced functionality. 4/30/26: With UAT starting in April, IV&V is evaluating defect trends, reopened issues, and batch stability in coordination with the ASI. IV&V awaits evidence from the ASI regarding recent batch job performance and execution results. Access to UAT-supporting components (Audit Log, Case Activity History, EDM, and Secure Enclave) remains pending, which may limit validation of all BES functionality. The ASI continues to add core functionality from the prior SIT phase to the automated regression coverage and running manual regression test where there are gaps in automation, whereas industry best practices typically expect this baseline to be established prior to UAT. In addition, with additional change requests (CRs) planned for later implementation in UAT, evidence of passing test coverage in lower environments, followed by expanded automation regression coverage and | | 3/16/2026<br>(regarding status update)<br>The automation process begins after DHS approves the SIT tests and SIT execution is underway. Although SIT has already started, we intentionally wait to automate until the manual tests have been executed at least once and confirmed to behave as expected. This prevents rework in both the manual and automated scripts if any test steps or expected results need adjustment. The review and case selection process |

| ID | Title | Reporter | Finding Type | Identified Date | Category | Observation | Significance | Recommendation | Event Horizon | Impact | Probability | Analyst Priority | Finding Status | Status Update | Client Comments | Vendor Comments |
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| 73 | The planned BES infrastructure is complex which could be difficult to implement and lead to schedule/cost impacts. | Frasca, Joe | Finding - Risk | 10/28/2021 | System Design | Current ASI infrastructure plans include a significant number of sophisticated components that make up a complex cloud infrastructure. Further, the Project Team has yet to finalize components that will make up the BES infrastructure and the additional costs and time to configure, test, and implement the planned complex environment remain unclear. | If the level of effort to implement and manage the complexities of the BES infrastructure is not accurately accounted for and staffed by the ASI, the project could be met with unexpected costs and schedule delays. Delays in finalizing the components being implemented could exacerbate this risks and lead to further delays. Complex platforms often present system maintenance and operations challenges as system changes can hold the increased potential for system failure (i.e., due to the significant number of "moving parts") and increase the level of time and effort to resolve infrastructure and application-level bugs. Further, some components remain in an immature state compared to their legacy counterparts. For example, the project recently experienced a system failure because Google Cloud failed to clearly communicate a change that led to failure in another component (i.e., Nexus). Google Cloud is generally viewed as a less mature product offering, compared to their rivals (Amazon Web Services, Microsoft Azure). IV&V remains concerned that this could lead to failures at critical points in the project (including post-go live production failures) that could be difficult to resolve and lead to project disruption. If DHS intends to eventually reduce M&O outsourcing costs turning over M&O tasks to State employees, they could face challenges supporting tools they may not be familiar with in a complex infrastructure environment. | • ASI develop a process to closely monitor cloud and other product changes (software updates/new releases), manage changes, and regression test once changes/updates are applied. • The project team work to establish strong governance over the utilization and maintenance of the various system tools/components. • ASI allot time in the schedule to conduct proof of concepts to assure infrastructure components work as expected. • ASI maintain a detailed schedule for infrastructure tasks to avoid unexpected delays that could delay project milestones and the critical path. | Next several months | 2 | 2 | Low | Open | 5/28/2026 - At the start of the reporting period, UAT was stopped by unexpected server restarts that resulted in a Role-Based Access Control (RBAC) database outage issue. The ASI immediately engaged Oracle and troubleshooting isolated the issue to a server hardware problem. On May 27th, Oracle moved the database to a new physical server, and the ASI had not observed an unexpected restart of the server by the end of the reporting period. The ASI reported that the RBAC database was the production database, and this is also used by UAT. IVV will assess this shared use of the RBAC database and any potential impacts to the BES infrastructure and users. The Infrastructure Management Plan was planned to be delivered to DHS on April 21,2026 and is now pushed to Mid-September. IVV is concerned that this delivery date is too close to the Pilot start of October 12, 2026, and does not provide adequate time to make changes to the infrastructure management process and documentation if updates are required for the Operations team. 4/30/2026 – The Infrastructure Management Plan was planned to be delivered to DHS on April 21,2026 and has not been received as of the end of the reporting period. With UAT underway, and the approaching Pilot, IVV observes the ASI tracking and maintaining of the infrastructure with information in various locations but is concerned about the lack of comprehensive and consolidated documentation for the BES infrastructure. UAT Batch Process defects were reported as resulting from incorrect environment configuration. This also raises IVV concerns about the ASI rgaintenance of the BES infrastructure. 3/31/2026 - Disaster Recovery issues, such as connectivity challenges between regions and delays in non production recovery testing due to pending server updates, continued to be worked and resolved by ASI during the reporting period. BindPlane is now in use as the logging forwarder, and | | 6/10/2026 The expected completion of September 4, 2026, is a month before Pilot Go-live. As explained at our previous meeting, the time needed to complete the CMP encompasses updates to the BES ServiceNow Instance which will include up-to-date/current information prior to Pilot Go-live. Please explain why the completion of the CMP a month before Pilot Go-Live is a concern? 2/13/2025 Perhaps for the next MSR we should review the outstanding |