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DEPT. COMM. NO. 430

STATE OF HAWAI'I | *KA MOKU'ĀINA O HAWAI'I*
DEPARTMENT OF ACCOUNTING AND GENERAL SERVICES | *KA 'OIHANA LOIHELU A LAWELAWE LAULĀ*

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES | *KE'ENA HO'OLANA 'ENEHANA*

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

July 15, 2026

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

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

Aloha Senate President Kouchi, 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 10 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 Attorney General (AG), Child Enforcement Agency (CSEA).

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 Hawai'i

Attachments (2)



STATE OF HAWAII
DEPARTMENT OF THE ATTORNEY GENERAL (AG)
CHILD SUPPORT ENFORCEMENT AGENCY (CSEA)

KEIKI Replatform Off Mainframe (KROM) Project

MONTHLY IV&V REVIEW REPORT

December 31, 2025 | Version 0.1

QUALITY.
INTEGRITY
INSIGHT

ACCUITY
ACCOUNTANTS

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Document History

DATE	DESCRIPTION	AUTHOR	VERSION
1/12/26	Monthly IV&V Review Report Draft created.	Michelle Muraoka and Dawn Rose	0.0
1/28/26	Monthly IV&V Report Final completed.	Dawn Rose	0.1

BACKGROUND

The State of Hawaii (State), Department of Attorney General (AG), Child Support Enforcement Agency (CSEA) contracted Protech Solutions, Inc. (Protech) on October 2, 2023, to replatform the KEIKI System and provide ongoing operations support. Protech has subcontracted One Advanced and DataHouse to perform specific project tasks related to code migration, replatforming services, and testing. The agreement with DataHouse was terminated in February 2025. The Department of AG contracted Accuity LLP (Accuity) to provide Independent Verification and Validation (IV&V) services for the project. In November 2025, Accuity joined the Crete Professional Alliance (Crete). "Accuity" now operates under two entities Accuity LLP – a licensed CPA firm providing attest services and Accuity Advisors – offering tax and business consulting (not a CPA firm). Both work together under the Accuity brand in an alternative practice structure, following AICPA standards and applicable laws.

Our initial assessment of project health was provided in the first Monthly IV&V Review Report as of October 31, 2023. Monthly IV&V review reports will be issued through February 2026 and build upon the initial report to continually update and evaluate project progress and performance.

Our IV&V Assessment Areas include People, Process, and Technology. 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 December 31, 2025. 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.

VISION

"A vision is not just a picture of what could be; it is an *appeal to our better selves,* a call to become **something more.**"

Rosabeth Moss Kanter

PROJECT ASSESSMENT

DECEMBER 2025

SUMMARY RATINGS

OVERALL RATING

Y

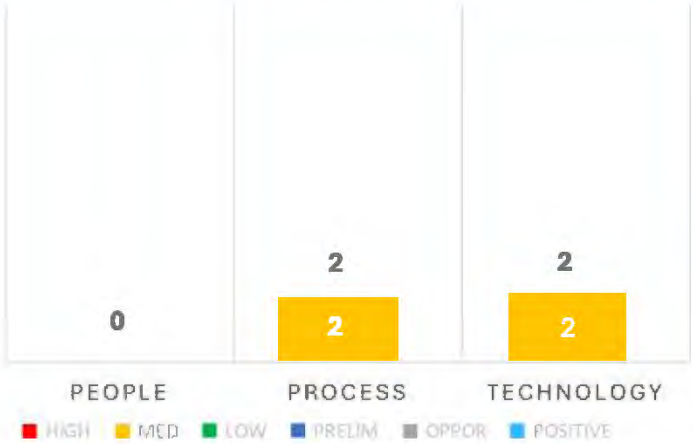
Deficiencies were observed that merit attention. Remediation or risk mitigation should be performed in a timely manner.

PEOPLE	Y
PROCESS	Y
TECHNOLOGY	Y

CRITICALITY RATINGS

R	Y	G	NA
HIGH	MEDIUM	LOW	N/A

IV&V OBSERVATIONS



0	4	1	8
NEW OBSERVATIONS THIS MONTH	OPEN OBSERVATIONS TOTAL	CLOSED OBSERVATIONS THIS MONTH	OPEN RECOMMENDATIONS TOTAL

PROJECT BUDGET *



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

PROJECT PROGRESS

(Percent of the weighted duration of total tasks)



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

KEY PROGRESS & RISKS

Key Progress:

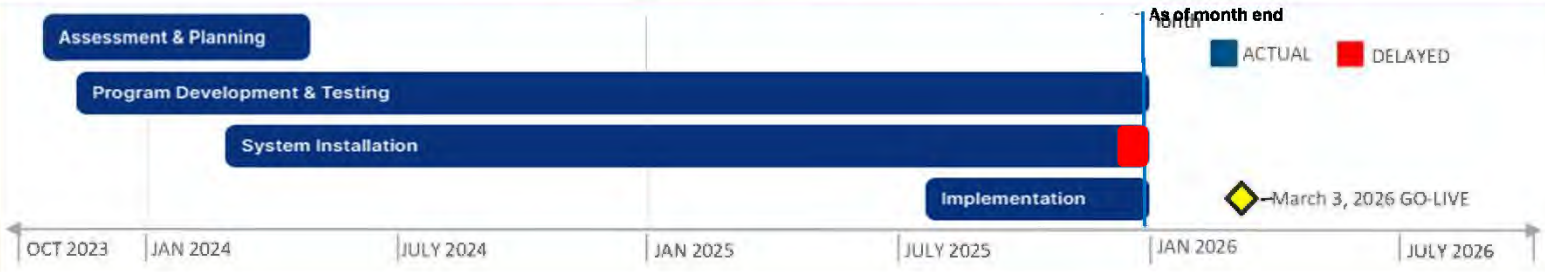
- Project overall is at 87% complete and system installation phase is at 99%.
- Acceptance Testing phase is at 70%, acceptance test execution is at 98%. 72% of the total test scripts successfully passed or passed with exceptions.
- 38 defects were corrected, of which 24 were formally closed following successful validation, while 14 remain open in a corrected status pending retest and approval through the Jira workflow.
- Six System Integration Testing (SIT) items as defined in the Memorandum of Understanding (MOU) were formally accepted by the State.
- The last *functional* outstanding SIT defect has been closed.
- Department of Labor agreed to utilize CSEA's Axway-based process, delivering cost and time savings while improving efficiency.

Key Risks:

- System Integration Testing is ongoing and at 97% complete and 12 *performance* SIT defects remain.
- UAT is on hold until a blocking financial batch defect affecting payment processing can be resolved.
- Six SIT items as included in the MOU remain outstanding.
- Deliverables #9, 12, 14, 15, 16, and 21 are past due and are outstanding.

PROJECT SCHEDULE – Current Progress

(See next page for the current agreement and schedule history)



KROM PROJECT SCHEDULE HISTORY

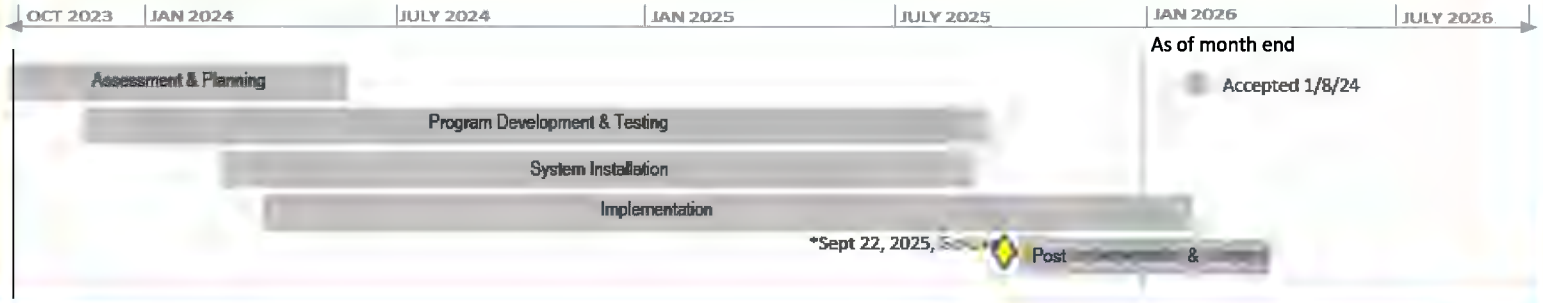
A historical perspective of the three project timelines for the KROM project post kick-off.

1. Project schedule as of DDI Project Management Plan, Deliverable 2 approval on January 8, 2024.

2. Project schedule based on the April 10, 2025, no-cost change request.

3. Project schedule based upon the August 29, 2025, change request PCR-8.

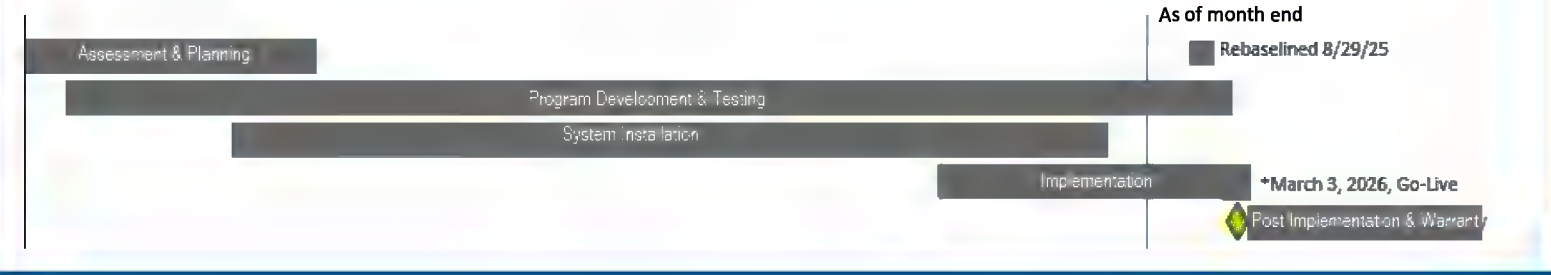
PROJECT SCHEDULE – Approved January 8, 2024, Deliverable 2



PROJECT SCHEDULE – Revised April 10, 2025, Signed Agreement



PROJECT SCHEDULE - Revised August 29, 2025, Change Request PCR-8



OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Overall	

Project Schedule:

As of the latest schedule report dated December 24, 2025, the KROM project is 87% complete, with the system installation phase at 99% completion. The December 24, 2025, report serves as the primary reference for the project update unless otherwise noted. The planned UAT period concludes on January 2nd. Execution was partially constrained by a blocking financial defect, and remaining testing with defect resolution may extend beyond the planned timeframe. While end-to-end testing has begun for select interface and SIT MOU scoped activities, full system-wide end-to-end testing remains dependent on interface close-out, resolution of blocking defects, and completion of UAT.

In mid-December a financial month-end issue was discovered and reported to IBM. As a result, *UAT was placed on hold*. However, 22 defects that were corrected and *retested* by CSEA. Of these, CSEA was able to close 18 (of the 22) as of December 31st. Acceptance Testing is at 85%

A 17-day schedule variance was reported by Protech with a go-live date of March 28th.

Several deliverables are outstanding. The table below summarizes these items along with the updated status. Due dates are based on the rebaselined schedule (PCR 7). According to the December 24th Project Schedule, here are the status updates-

Deliverable	Complete %	Due Date	Comments and Status
Del #9- Disaster Recovery Plan	98%	October 2025	Plan was submitted. The walk through meeting was completed. Disaster recovery testing is in progress. CSEA awaiting resubmittal updates.
Del #12- Knowledge Transfer Plan	15%	December 2025	Open item for ProTech to complete initial draft
Del #14- Implementation Plan	89%	October 2025	The deliverable was submitted. The walk through meeting was completed. CSEA is awaiting resubmittal updates.
Del #15- User Guide	85%	October 2025	CSEA reviewed and submitted comments. ProTech to incorporate comments and feedback.
Del #16-System Administration Manual	67%	December 2025	Open item for ProTech to complete initial draft.
Del #21-Knowledge Transfer Plan	0%	December 2025	Not started

Project Costs:

86% of the project costs have been expended. The project costs are consistent with the approved budget and are in line with the 87% completion of the project currently reported.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Overall cont.	**Quality:** 6 out of the 12 total outstanding SIT items as defined in the Memorandum of Understanding (MOU) were formally accepted by CSEA. The formal process for approving deliverables is being followed, providing clear control and transparency over the work submitted to the State. CSEA continues to manage Jira. This process has been effective in keeping the State informed and provides greater transparency. With these two newest processes in place, the State has strengthened project oversight and engagement which enhances accountability and significantly improves overall project quality by reducing ambiguity and ensuring consistent standards for deliverable acceptance. **Project Success:** The last remaining SIT functional defect has been addressed. 12 performance SIT defects remain. With these items addressed, the System Installation Phase has increased to 97% complete. Although UAT testing was placed on hold, 22 defects that were corrected were able to be retested by CSEA. Of the 22, 18 defects were successfully closed with the remaining 4 partially passing. Another success was achieved with the Integrate Interface File Transfer process and Axway-based file routing related to the State's mainframe decommissioning effort with the exception of a few departments such as the Department of Labor. CSEA proposed a solution to route the Department of Labor's four jobs through the Attorney General's Axway-based process. Labor agreed to adopt this approach, which will simplify execution, reduce complexity, and improve cost efficiency. Based on CSEA's December 30th UAT Test Scripts dashboard, 80 test scripts were tested and passed or passed with exception in December. Overall, 72% or 1,300 test scripts of the approximately 1,807 total test scripts passed or passed with exceptions. 38 defects were corrected, of which 24 were formally closed following successful validation (includes 1 functional and 3 performance SIT defects), while 14 remain open in a corrected status pending retest and approval through the Jira workflow. **Risk Conclusion:** The project is currently rated **yellow** reflecting continued risk due to delay in UAT, remaining unresolved System Integration Testing (SIT) and User Acceptance Testing (UAT) defects, untested batch jobs, delayed deliverables, and delayed MOU activities.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
		Y	People Team, Stakeholders, & Culture	Strong teamwork and communication continues and remains evident throughout the reporting period. CSEA and ProTech maintain close coordination when faced with challenges. The teams worked diligently to close System Integration Testing (SIT) items, address defects, and execute batch job testing. Furthermore, team members engaged in a wide range of testing and implementation activities, including: • Reviewing and updating deliverables to ensure accuracy and completeness. • Submitting, reviewing, and accepting MOU activities to close the SIT phase. • Processing and resolving defects to maintain system integrity. • Performing database replication and conducting regression testing. • Initiating and executing mainframe JCLs, including batch jobs not previously exercised under end-to-end or replatformed conditions. • Developing detailed reports on performance metrics and compliance. Additional efforts focused on enhancing operational readiness, such as updating the Disaster Recovery (DR) plan, preparing UAT deployment checklists, and collaborating on Memorandum of Understanding (MOU) items and partner communications for interface testing. **Team:** CSEA and ProTech worked collaboratively to respond to a payment processing error identified in a month-end batch job, which resulted in a temporary pause in User Acceptance Testing (UAT) in mid-December. During this period, coordinated troubleshooting and correction activities were undertaken, and UAT retesting resumed selectively for non-payment-dependent defects. In parallel, ProTech applied the established requirements validation and approval process, resulting in formal CSEA acceptance of 6 of 12 SIT MOU items during the month. ProTech also supported partner coordination and communications for interface testing, contributing to continued progress on interface validation activities reflected in the December schedule. **Stakeholders:** Two external dependencies identified in October remain open and an additional issue was added. There is concern for product software vendor oversight in managing and addressing issues timely. The first involves a five-thread parallel processing solution designed to address SIT performance defects. Final run-time results were due mid-December from IBM and are still pending. Although the severity is not critical, because these involve open SIT defects, these are of highest priority and need to be resolved. There was an issue involving a month-end payment job that halted UAT. Although CSEA was prepared to proceed with testing activities in December, IBM was unavailable until January 5, 2026 to address the issue thus causing delays in UAT. The schedule will require adjustment based on IBM's resolution timeline. Communication with IBM is managed by ProTech. Lastly, Precisely is a software vendor that is used to validate, standardize, correct and cleanse addresses using global postal standards. Last month, an issue involving a misclassified address was successfully resolved. However, a secondary non-critical issue remains open. ProTech and Precisely continued to work together to address this outstanding issue and resolve code discrepancies.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	People Team, Stakeholders, & Culture Cont.	**Culture:** The collaborative culture between CSEA and ProTech remains strong. Both are open to working together, are adaptable to each other's concerns and needs, and show shared accountability throughout the reporting period. Both teams demonstrated consistent communication and coordination to support each other to overcome challenges and maintain progress. **Risk Conclusion:** The people dimension risk has increased to yellow. While the primary project teams continue to demonstrate strong teamwork, collaboration, and effective communication, delays in stakeholder engagement and coordination with external vendors, including IBM and Precisely, have impacted User Acceptance Testing (UAT) and introduced schedule variances. These constraints highlight challenges in stakeholder management, and the overall project risk level has increased.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Process Approach & Execution	**Process:** The project continues to be in User Acceptance Testing (UAT) while also running in parallel with System Integration Testing (SIT) phases. A newly introduced process is highlighted. Updates are also provided on two processes introduced in November. : • **Defects and Issues Handling Process -** Jira is the primary tool that ProTech uses to track, prioritize, and manage all defects and issues. • **Requirements Validation Process -** In November, the following formalized requirements and MOU activities validation process was implemented: o ProTech's project manager prepares an email cover letter which includes a description, the supporting evidence that the task was completed. CSEA reviews the emailed form, and if acceptable, signs it. The approved requirement is converted into a pdf format, cataloged into the Project Library, and becomes a project artifact. • **Mainframe Interface Process** - CSEA established a process that takes the KEIKI data, pushes it through Axway, and moves it to Host A. The same process is reversed to "get" data from the mainframe. This process was developed in response because data still needs to be "put" and received "get" from the mainframe. **Approach:** • **Defects and Issues Handling Process -** In November, CSEA took over managing Jira. CSEA continues to manage Jira, executing control over the defect review, assigning severity, validation, and approval process. • **Requirements Validation** Process - CSEA and ProTech collaborated to resolve outstanding issues, and ProTech applied the new formalized validation process to submit six MOU activities for CSEA's acceptance. • **Mainframe Interface Process** - The State is in the process of decommissioning the mainframe with only a few departments such as the Department of Labor retaining access. CSEA needs to continue transferring and downloading data from the mainframe. In a financially strategic move and to streamline operations, CSEA proposed routing the Department of Labor's four jobs through Axway using CSEA's process. This approach simplifies execution, reduces complexity, and delivers cost and time savings while improving overall process design.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Process Approach & Execution	**Execution:** **Defect and Issue Handling Process -** The management of issues and defects continues to progress effectively. With CSEA fully managing Jira, the process is more streamlined and transparent. Defect review, validation, and approval are being handled promptly, reducing delays and improving overall efficiency. As a result, ProTech can allocate more time to other testing and implementation activities. This transparency is driving faster turnaround times, minimizing bottlenecks, and reinforcing quality assurance. **Requirements Validation Process-** With the conclusion of the UAT period, there is heightened urgency to close all outstanding defects, issues, and deliverables. The updated process, which emphasizes formal review and acceptance by CSEA, is critical to maintaining clarity and reducing ambiguity. By ensuring that "completed" tasks meet documented acceptance criteria, the process creates an auditable trail for compliance and mitigates risk associated with misinterpretation. Although the new approach requires additional communication, it is being actively utilized and has established a clear understanding of which MOU activities and deliverables have been formally accepted by the State. **Mainframe Interface Process-** A significant success was achieved related to the State's mainframe decommissioning initiative. As the primary State IT mainframe moves towards closure, only a few departments such as the Department of Labor will retain access. To streamline operations, CSEA proposed routing these jobs through Axway into CSEA's process rather than configuring them directly on the mainframe. This approach simplifies execution, reduces complexity, and delivers cost and time savings while improving overall process design. Labor agreed to adopt this solution, making a significant achievement in ensuring continuity and efficiency during the transition. **Risk Conclusion** The risk rating for the process dimension remains **yellow** trending up. There was measurable improvement in execution and governance during the reporting period. Enhanced defect management through CSEA's ownership of Jira, formalized requirements and MOU acceptance processes, and structured interface coordination have improved visibility, reduced ambiguity, and strengthened traceability and quality outcomes. These process improvements are being actively utilized and are contributing positively to testing progress and issue resolution. However, further refinement of traceability in alignment of Schedule, Critical Path, MOU activities and high impact defects will reduce residual risk, particularly as the project advances toward System Acceptance and Go/No-Go decision points.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Technology System, Data, & Security	As of the end of December 2025, the overall status of technical activity milestones were reported as follows:

KEIKI Technical Milestone Variance & Dependency Summary

Technical Activity / Milestone	Baseline Finish (Approved)	Current / Forecast Finish	Variance (Days)	% Complete	Dependency Impact	Source
System Installation Phase (Summary)	12/5/2025	12/29/2025	+24	99%	Cannot formally close due to incomplete interface and operational close-out activities, including Interface File Transfer Process and Daily Task Process completion.	KEIKI Project Schedule_12242025.pdf, Line 159
Disaster Recovery Plan (D-9)	10/8/2025	12/29/2025	+82	98%	Approval milestone remains open, preventing full closure of DR deliverable and contributing to System Installation Phase remaining open.	KEIKI Project Schedule_12242025.pdf, Lines 160–182
Program Development & Testing Phase	2/26/2026	3/31/2026	+33	93%	Completion required to support Acceptance Testing and System Acceptance Results (D-13).	KEIKI Project Schedule_12242025.pdf, Line 332
System Test (D-7)	12/10/2025	2/23/2026	+75	96%	Remaining SIT performance and interface-dependent scenarios delay production of System Test Results (D-21).	KEIKI Project Schedule_12242025.pdf, Lines 418–445
System Testing Execution	12/10/2025	2/23/2026	+75	95%	Dependent on resolution of performance defects and completion of interface testing.	KEIKI Project Schedule_12242025.pdf, Line 445
Interface File Transfer Process	12/23/2025	1/16/2026	+24	87%	On the critical path; incomplete interface validation constrains UAT scenarios and downstream acceptance.	KEIKI_CriticalPath_12242025.pdf; KEIKI Project Schedule_12242025.pdf, Tasks
OCSS Interface Testing	12/23/2025	1/16/2026	+24	58%	Required before Interface File Transfer Process can be fully closed and end-to-end interface readiness confirmed.	KEIKI_CriticalPath_12242025.pdf
Acceptance Test Phase (D-11)	2/26/2026	3/31/2026	+33	85%	Must complete before System Acceptance Test Results (D-13) can be produced.	KEIKI Project Schedule_12242025.pdf, Line 644
Acceptance Testing Execution	2/26/2026	3/31/2026	+33	70%	Partially constrained by unresolved financial batch defect and interface-dependent scenarios.	KEIKI Weekly Status Report_12242025.docx; KEIKI Project Schedule_12242025.pdf,
System Acceptance Test Results (D-13)	2/26/2026	3/31/2026	+33	0%	Dependent on completion of UAT, interface validation, and State review.	KEIKI Project Schedule_12242025.pdf, Lines
Implementation Phase	3/18/2026	4/5/2026	+18	61%	Dependent on approval of Acceptance Results and readiness for Go/No-Go (D-18).	KEIKI Project Schedule_12242025.pdf, Line 787
Implementation Planning (D-14)	10/14/2025	1/5/2026	+83	89%	Approval required before full execution of implementation tasks.	KEIKI Project Schedule_12242025.pdf, Lines
Training (D-12)	2/11/2026	3/16/2026	+33	37%	Dependent on updated documentation and SME availability.	KEIKI Project Schedule_12242025.pdf, Line 839
Go-Live Activities	3/3/2026	4/5/2026	+33	0%	Dependent on successful completion of Implementation Tasks and Go/No-Go decision.	KEIKI_CriticalPath_12242025.pdf
Go / No-Go – Deliverable #18	3/3/2026	4/5/2026	+33	0%	Requires full validation of production readiness, UAT completion, and interface	KEIKI Project Schedule_12242025.pdf, Line 912

Dependency Impact Summary

New in December: Formal State acceptance of SIT MOU Complete Part 1 closes technical dependencies for six SIT items, including data conversion utilities, replication, CyberFusion/OCSS transmission, Windows printing, and selected non-performance fixes.

Remaining Gates: D-13 (System Acceptance Test Results) and Go/No-Go remain dependent on UAT completion and State acceptance of remaining MOU scope.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Technology System, Data, & Security Cont.	

System:

As of December 24, 2025, overall system maturity continues to advance, with several foundational technical milestones completed; however, system readiness remains influenced by ongoing testing and interface dependencies. The System Installation Phase is at 99%, pending task ID 614, interface file transfer process completion has a targeted finish date of January 16, 2026. System Integration Testing (SIT) is reported at 97% complete, with a limited number of performance-related items remaining open.

Acceptance Testing (UAT) is reported at 70% complete. While execution of selected UAT activities has been temporarily constrained due to an unresolved financial batch defect, other UAT testing categories continued to progress during the reporting period. Jira data shows 98 total defects remaining as of December 24th, including 12 SIT performance defects and 86 UAT functional defects. Of these, 5 defects are explicitly marked as blocked, spanning batch and online processing areas, and represent focused constraints that continue to influence the timing of full UAT completion and progression toward System Acceptance Test Results (D-13).

Defect Count Variance (Start of December → End of December)

Defect Category	Start of Dec	End of Dec	Net Variance	Source
SIT – Functional	1	0	–1	Weekly Status 12/24/25
SIT – Performance	15	12	–3	Weekly Status 12/24/25
UAT – Functional	116	86	–30	Weekly Status 12/24/25
Total Defects	132	98	–34	Weekly Status 12/24/25

Interface related system activities remain on the critical path. The Interface File Transfer Process is reported at 87% complete, and OCSS interface testing at 58% complete, with both activities extended through January 16, 2026, reflecting a documented 24-day variance from the original December 23 baseline. In addition, code deployment and build activities are scheduled through January 26, 2026, contributing to the overall 17-day schedule variance reported in the December 24th Weekly Status Report. As a result, System Acceptance (D-13) and Go/No-Go (D-18) remain dependent on completion of remaining UAT activities, interface validation, and resolution of outstanding defects.

As of December 24, 2025, the KEIKI system demonstrates continued technical progress, with system installation substantially complete and the majority of system and acceptance testing executed; however, outstanding batch-related defects, ongoing interface testing, and partial constraints on UAT execution continue to influence readiness for System Acceptance and downstream Go/No-Go decisions.

OCT	NOV	DEC	IV&V ASSESSMENT AREA	IV&V SUMMARY
Y	Y	Y	Technology System, Data, & Security Cont.	**Data:** • ***Data Extracts and Validation***: As of December 24, 2025, hybrid data extract and validation activities remain stable. Prior data extracts and validations, including NSD.DHS.OBLIGAT and NSD.DHS.DISBURSE, remain closed with no reopened issues reported. Data exchange mechanisms supporting extracts, including file generation and transfer processes, continue to operate without reported failures. However, full end-to-end validation remains dependent on completion of downstream interface activities reflected in the Master Schedule dated 12/24/25. • ***Mainframe Data Exchange and CyberFusion:*** Mainframe-to-distributed environment data exchange activities show substantive progress. The Interface File Transfer Process is reported at 87% complete, with development and testing of mainframe JCL transfers ongoing. While OCSS CyberFusion transmission has received formal SIT acceptance under the SIT MOU Part 1, full interface close-out remains pending completion of remaining interface validation tasks. The Interface File Transfer Process Complete milestone remains open and scheduled through January 16, 2026, indicating that end-to-end operational validation is not yet complete. • ***Data Performance and Replication:*** Database replication activities, including replication to CSEASQLTEST and CSEADSS1, have received formal SIT acceptance as documented in the SIT MOU Part 1. Performance-related testing continues, with 12 active SIT performance defects remaining open as of December 24th. Batch performance testing and runtime evaluation activities are reflected on the critical path, extending through January 26, 2026, indicating that performance stabilization remains an active area of work. • ***Data Readiness and Ongoing Tasks:*** Batch and operational readiness activities continue to progress. The Evaluate Daily Task Process activity is reported at 99% complete, with its completion milestone scheduled for December 26, 2025. Due to this and other remaining interface-related tasks, the System Installation Phase summary task remains at 99% complete, preventing formal phase closure within the schedule. Data-related operational readiness is therefore substantially complete but not fully closed as of the December reporting period. • **Security:** Project security remains stable with no new security-related defects reported during the December reporting period. Secure file transfer mechanisms, including SFTP and CyberFusion, are operational and have received SIT-level acceptance where applicable. Remaining CyberFusion-related activities are tied to interface close-out and end-to-end validation rather than identified security control deficiencies. **Risk Conclusion:** As of December 24, 2025, the KEIKI project remains in Yellow status due to active performance defects, incomplete interface activities, and constrained UAT execution on the critical path. While several SIT MOU items have been formally accepted, remaining interface validation and UAT completion are still required to support System Acceptance (D-13) and Go/No-Go (D-18) readiness.

OPEN OBSERVATIONS- Current Month Updates

OBSERVATION #: 2025.09.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: **PROJECT MANAGEMENT SCHEDULE REPORTING**

Observation: Project Management Schedule Reporting: Currently the project is in the User Acceptance Testing (UAT) phase. A MOU was signed in August 29, 2025 outlining the remaining System Integration Testing activities that are outstanding and expected completion dates. In addition, other issues such as critical severity defects have been identified and must be resolved prior to go-live. These SIT activities and defects are not clearly visible in the project schedule.

Industry Standards and Best Practices: PMBOK® 7th Edition Section 2.4.7 states changes should follow a change control process, reprioritizing the backlog, or rebaselining the project.

Section 2.4.9 Alignment sates that there should be an integrated project management plan.

Analysis: Tracking of important dates and deadlines should be centralized and reflected in the project schedule for maintenance, tracking, and visibility purposes. These dates and deadlines could be missed or issues remain unresolved.

Recommendation(s): To mitigate these risks the following are recommended:

CLOSED: 2025.09.001.R1- Add MOU Activities to the Project Schedule or Other Presented Project Documents

- Add PCR-9's MOU activities to the Project Schedule or any of the presented project documents. Where feasible, activities may be aggregated and reported as a percentage complete. Use clear, descriptive labels (i.e. SIT defect, MOU 2.2, etc.) to ensure easy identification and traceability.

2025.09.001.R2- Assess Critical Path Impact of MOU Activities

- The MOU specifies activities that are due by December 18th, confirm if any of the activities are on the critical path especially since UAT ends on January 2, 2026. Update the Project Schedule, as necessary.

2025.09.001.R3-Tracking of critical severity/major priority defects

- Add critical severity/major priority defects and related timelines to the Project Schedule or related presented project documents. Include the defect number for tracking purposes. And include any staff or team members that are assigned to the defects or activities.

CLOSED: 2025.09.001.R4- Defects Reporting for Parent-Child Rollups

- For UAT defects, enhance Jira reporting to include parent-child rollups defect counts (to show root cause across multiple test scripts). Also add if currently maintained and feasible, estimated resolution date or time, defect discovery date, and linkage to schedule impacts for critical severity, highest priority, "show-stopper" defects. Add or include this Jira report to any of the regularly presented project documents as part of the defect management process.

OBSERVATION #: 2025.09.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: **PROJECT MANAGEMENT SCHEDULE REPORTING CONT.**

Status Update: 12/31/25

2025.09.001.R2/R3- Integrated Schedule Visibility for MOU Activities and Critical Severity/Major Priority Defects

Status: Remains open

Integrate remaining MOU activities and critical severity/major priority defects into the Integrated Master Schedule or formally presented project documents, with clear linkage to milestones and the critical path. This will ensure transparent visibility into how unresolved obligations and blocking defects affect UAT completion, System Acceptance, and Go/No-Go readiness.

- Identify whether remaining MOU activities are on or off the critical path, including any impact to UAT completion, System Acceptance (D-13), and Go/No-Go (D-18).
  - Represent critical and blocking defects as schedule-relevant items, including:
  - Defect ID (or reference),
  - Associated activity or deliverable,
  - Responsible owner/team, and
  - Expected resolution or validation window.
  - Provide sufficient traceability to allow stakeholders to understand how unresolved MOU obligations and critical severity/major priority defects influence schedule realism and downstream readiness decisions.

  Where full task-level decomposition is not feasible, aggregated schedule activities or companion reporting artifacts may be used, provided the impact to milestones and critical path is clearly documented and routinely maintained.

Several MOU activities correspond to general activities in the project schedule. However, these dates appear to be stale and need to be updated.

- **Example 1-** MOU item 2.4.3 Mainframe JCLs. Project Schedule ID 592 to develop file transfer JCLs and ID 593 to test file transfer JCLs are at 90% and 75% complete respectfully, however the finish date is 12/31/25. ID 593 is on the critical path and there is a dependency on ID 593 that affects the Interface File Transfer Process, ID 614 which is also on the critical path. It appears these schedule dates need to be reviewed and updated.

- **Example 2-** MOU item 2.2 KEIKI SSO Authentication. Project Schedule ID 632 states it is 92% complete and finish date is 12/29/25. There is a dependency on ID 770 perform final acceptance test cycle. ID 632 is not on the critical path, however, ID 770 is on the critical path.

OBSERVATION #: 2025.08.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: **IMPLEMENTATION PHASE GATING**

Observation: Implementation Phase Gating: System Installation Testing (SIT) should be completed with no open defects prior to entering UAT. PCR-9 allows for the project to enter the Implementation Phase prior to completing SIT activities including unresolved defects and untested batch jobs.

Industry Standards and Best Practices: SWEBOK v3.0 Chapter 5 recommends that System testing is performed before acceptance testing to ensure that the system meets its specified requirements.

ISO/IEC 27001 Annex A.14.2.9 states that System acceptance testing procedures must be completed and reviewed to ensure all functional and security requirements are met before user acceptance tests are conducted.

Analysis: Initiating UAT while system testing is still underway introduces risk. Although ProTech has assured CSEA that there would be no conflicts with UAT, higher priority or severity defects may be uncovered during UAT that may interfere with completing the SIT defects on schedule. This dual focus strains resources, as teams are forced to juggle defect resolution and UAT execution simultaneously and it may result in the inefficient use of personnel and delays.

Recommendation(s): To mitigate these risks the following are recommended:

2025.08.001.R1-Define Plans and Set Up Checkpoints to Monitor Progress

- As deadlines have been assigned, ensure that there are defined plans and set up checkpoints to ensure the assignees have a road map and progress can be monitored.

CLOSED: 2025.08.001 R2- Track Defects and Prioritize

- Track defects rigorously, prioritizing resolution to stabilize the system as quickly as possible

CLOSED: 2025.08.001 R3- Prepare to Deploy Staffing Upon SIT Completion

- Adjust the UAT schedule and staffing to ensure resources are deployed effectively once the system is ready.

2025.08.001.R4-Prepare UAT Documentation and SIT Contingency Plan(s)

- Prepare test teams with updated documentation, defect status reports, and contingency plans to resume UAT efficiently once the system testing is complete.

OBSERVATION #: 2025.08.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: **IMPLEMENTATION PHASE GATING CONT.**

Status Update: 12/31/25

2025.08.001.R1- Define Plans and Set Up Checkpoints to Monitor Progress **Status**: Remains open

To strengthen the implementation phase, it is critical to define clear plans and establish checkpoints to monitor progress effectively. Currently, it is challenging to see what comes next among the numerous activities without a consolidated document. Although UAT was placed on hold, it appeared that Deliverables 9 (12/29), 14 (1/5), and 15 (12/31) were close to finishing, were past due, but without checkpoints. Visibility into their status was limited until CSEA initiated inquiries.

While mechanisms and tools exist to communicate, provide updates, and ask follow-up questions—such as risk meetings, MOU schedule meetings, and weekly status meetings to review the overall project schedule and major deliverables—these need to be leveraged more consistently. Moving forward, consolidating these updates into a single, accessible source will help ensure alignment, reduce ambiguity, and allow stakeholders to track progress and dependencies more effectively.

2025.08.001.R4- Prepare UAT Documentation and SIT Contingency Plan(s) **Status**: Remains open

In a December 30th meeting, CSEA asked ProTech to provide a contingency (plan) because UAT was on hold and the delay may be extended. ProTech agreed to provide a response. IV&V will continue to monitor as SIT and UAT remain open and unfinished.

OBSERVATION #: 2024.12.006	STATUS: CLOSED	TYPE: **RISK**	SEVERITY: Moderate

TITLE: **REQUEST EXTENSION FOR NON CRITICAL DELIVERABLES**

Observation: Some lower-priority testing, such as reporting subsystem batch jobs, reflects 0% progress.

Industry Standards and Best Practices: : PMBOK® v7 encourages scope and schedule flexibility in adaptive project environments.

Analysis: Delays in non-critical tasks, such as reporting subsystem batch jobs with 0% progress, highlight the need to reallocate resources to critical testing activities. By deprioritizing these areas and requesting extensions, as supported by PMBOK® v7, the project can focus on achieving timely completion of high-priority deliverables such as KMS Go Live.

Recommendation(s): To mitigate these risks the following are recommended:

2024.12.07.R1- Request Extension for Non-Critical Deliverables: Deprioritize non-critical testing areas and request extensions for their delivery to reallocate focus to critical testing. To ensure timely completion of high-priority deliverables such as KMS Go Live.

Status Update: 12/31/25 **Status: CLOSED**

2024.12.07.R1- This recommendation to request an extension for non-critical deliverables is no longer applicable. All deliverables, including lower priority items are being actively managed by CSEA to complete within the established timeline.

OBSERVATION #: 2024.06.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: **DATA EXTRACTION AND MIGRATION**

Observation: There is a risk for delays in the data extraction process, which is critical for the cutover activities, due to reliance on shared mainframe resources, inefficiencies in data extraction programs, and long download/upload times. This could impact the project by increasing costs, compromising the quality of the overall solution, and causing operational downtime of 4 to 5 days during the cutover weekend, thereby extending the project timeline.

Industry Standards and Best Practices: : IEEE 1012-2016 Emphasis: Verification ensures that the system is built correctly according to its specifications.

IEEE 1012-2016 Emphasis: Validation ensures that the system meets its intended use and satisfies user needs.

IEEE 1012-2016 Emphasis: Risk management is integrated into the IV&V process to identify potential risks and implement mitigation strategies.

IEEE 1012-2016 Emphasis: Resource management is crucial for the successful execution of project activities.

Analysis: The data extraction process is critical for the cutover activities and current projections show potential for significant delays. This issue results from reliance on shared mainframe resources, inefficiencies in data extraction programs, and long download/upload times. Each time new data is needed for testing, the entire database must be extracted, which is time-consuming. CSEA is evaluating a SQL replication strategy to replace the current process and has assigned two dedicated resources to identify and test this approach. Daily meetings with DDI and CSEA have been established to collaborate on this issue. The target for validating this approach is July 31st.

The static data collected from the data extract process projects a worst-case scenario of 12 to 36 days to fully extract ADABAS data to the 374 flat files, including downloading and uploading the files. This arises due to: 1) CSEA uses a shared mainframe, 2) inefficiencies of data extraction programs, 3) download/upload times. The data extract process is central to the cutover activities completing over Fri/Sat/Sun. If not improved, CSEA may face 4/5 days operational downtime for cutover weekend.

Recommendation(s): To mitigate these risks the following are recommended:

2024.08.001.R1 - Verification of Data Extraction and Conversion Processes

- Implement a thorough verification process for all data extraction and conversion methods, particularly the Ascii to BCP script conversions. Establish checkpoints where the file counts and conversion accuracy are verified before moving to subsequent phases of the project to avoid potential issues in later stages.

2024.08.001.R2 - Validation of Extracted Data Consistency

- Conduct end-to-end validation of the extracted data, ensuring that the SQL-to-SQL comparisons are consistent and match across systems (Protech and CSEA). Given the noted discrepancies, a validation step should be introduced after each major extraction and conversion task (e.g., Task 18). This will confirm that the extracted data matches the expected output and is usable for further processing.

OBSERVATION #: 2024.06.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: DATA EXTRACTION AND MIGRATION CONT.

Recommendation(s) (continued):

2024.08.001.R3 - Risk Management for Binary and Ascii File Handling

- Assess the risks associated with the conversion and handling of binary and Ascii files. Discrepancies in binary file counts and the use of converters for 27 files were discussed. It is recommended to perform risk analysis on these conversions, ensuring that any potential data corruption or loss during conversion is identified and mitigated. Consider implementing additional testing and validation for these specific files.

CLOSED: 2024.08.001.R4 - Resource Management and Space Availability

- The observation regarding potential space risks should be taken seriously. Conduct a resource assessment to ensure that there is sufficient storage and computing resources to handle the extraction, conversion, and processing of data. This should be done before the extraction process begins, with contingency plans in place in case of resource shortages.

Status Update: 12/31/25

2024.06.001.R1 / R2 - Verification & Validation of Data Extraction and Exchange Processes **Status**: Remains open

Although the November 12 data extract executed successfully and SFTP/FTP processes remain stable, full end-to-end validation has not occurred. TestSystDB01 replication has no documented completion, and FTP1 setup and DHS access continue to block mainframe JCL and CyberFusion testing. These dependencies prevent confirmation that extraction and exchange processes function under production equivalent conditions.

2024.08.001.R3 - Risk Management for Binary and ASCII File Handling **Status:** Remains open

No new issues were reported with file conversions; however, full validation across all binary and ASCII files has not been completed. Pending FTP1 configuration, mainframe JCL execution, and the lack of file-level reconciliation continue to prevent closure of this recommendation.

OBSERVATION #: 2024.03.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Moderate

TITLE: **INTERFACE PLANNING AND FLEXIBILITY CONT.**

Observation: The timing of other State of Hawaii modernization projects impacts the ability to properly design KEIKI system interfaces and will necessitate the need for interface modifications after its deployment, which can lead to additional costs, delays, and disruption to the system.

Industry Standards and Best Practices: N/A

Analysis: CSEA's KEIKI system currently relies on a legacy cyberfusion system running on the State's mainframe for system file and data exchanges with multiple State of Hawaii agencies. The timing of multiple agencies moving off the mainframe at different times will result in the need to modify KEIKI system interfaces after the system has been deployed. Until other State modernization projects are completed, the KEIKI project cannot perform server-based data exchanges and will need to continue to interface via the mainframe.

In addition, as the KEIKI project involves integrating a modernized child support system with existing legacy systems, there may be other technological and architectural gaps that arise. These gaps can include differences in technology stacks, such as programming languages, database systems, and operating environments, as well as the absence of modern application programming interfaces (APIs) in the legacy systems. Based on the timing of concurrent State of Hawaii modernization projects and upgrades, the end-to-end testing of the KEIKI system may necessitate the undertaking of supplementary tasks, allocation of additional resources, and coordination efforts.

Recommendation(s): To mitigate these risks the following are recommended:

CLOSED: 2024.07.001.R1 – It was recommended that CSEA meet with the new Chief Data Officer. And also to meet with the EFS team to identify any potential impacts to CSEA and align with IT policies.

CLOSED: 2024.03.001.R1 – CSEA should coordinate regular meetings with impacted State of Hawaii agencies.

- Roles, responsibilities, expectations and interface requirements should be clearly defined to ensure information and project status is proactively communicated for the various modernization efforts.

OBSERVATION #: 2024.03.001	STATUS: OPEN	TYPE: RISK	SEVERITY: Low

TITLE: **INTERFACE PLANNING AND FLEXIBILITY**

Recommendation(s) cont.:

2024.03.001.R2 – The projects should properly plan for interfaces so that they are flexible enough to accommodate future changes and are compatible with other agencies.

- Clearly identify all the interfaces that the system will interact with and how they will communicate.
- Develop interfaces and data structure that are flexible enough to accommodate changes to the interfaces.

Status Update: 12/31/25

2024.03.001.R2- Interface execution and validation activities continue to progress, including formal acceptance of CyberFusion transmission; however, KEIKI remains dependent on legacy, mainframe-based interfaces, and interface completion activities remain on the critical path. Until broader State modernization initiatives are completed and future-state interface approaches are implemented, the risk of post-deployment interface changes, additional cost, and operational disruption remains, this observation 2024.03.001.R2 appropriately remains open.

Appendix A: IV&V Criticality and Severity Ratings

IV&V CRITICALITY AND SEVERITY RATINGS

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

TERMS

RISK
An event that has not happened yet.

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

Criticality Rating

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



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

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

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

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

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
CMMI-DEV v2.0	CCMI ® - Integrated performance solution framework
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 929-2012	Institute of Electrical and Electronics Engineers (IEEE) Standard for Software and System Test Documentation
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
ITIL v4	PeopleCert- ITIL ® Foundation – IT governance and service management

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: Comment Log on Draft Report

Comment Log on Draft Report

KROM Project: IV&V Document Comment Log	
	ACCUITY

ID #	Page #	Comment	Commenter's Organization	Accuity Resolution
1	23	Recommend Observation 2024.03.001 be closed. CSEA continues to work closely with State of Hawaii stakeholders, keeping current with their parallel-running projects. The DDI remains flexible in adjusting their work to compensate with changes at the other state agencies. Finally, CSEA has included UAT tasks to ensure that all partners with whom data is shared have opportunities to test and ensure data compatibility	CSEA	IV&V acknowledges CSEA's coordination with State stakeholders and DDI's flexibility in adapting interface execution, including implementation of a standardized Axway-based routing approach for agencies remaining on the mainframe. As reflected in the December 24, 2025, Integrated Master Schedule (IMS), remaining interface activities are planned, visible, and tracked on the critical path, reducing the likelihood and impact of unplanned interface disruption. Based on these mitigations, IV&V agrees that the risk level for Observation 2024.03.001 may be downgraded from Moderate to Low. However, because interface completion and validation activities remain open in the December IMS and full end-to-end testing is still in progress, the observation should remain open and be monitored through System Acceptance and Go/No-Go decision points. The rationale is that the execution risk has been reduced, but the structural dependency remains.
2				



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