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DEPT. COMM. NO. 448

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

August 18, 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 July 2026 report for the State of Hawai'i Department of Human Services, Systems Modernization Project, as received by the Office of Enterprise Technology Services.

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)

Hawaii Department of Human Services Systems Modernization Project

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

Submitted: August 17, 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 BES Pilot implementation is right around the corner, the focus of the project team has heightened, and they continue to work on several key activities this month, including:

- Executed User Acceptance Testing
- Defined, Coded, and tested Change Requests
- Refined and executed the Pilot Readiness tasks and activities
- Development of the configuration Management and Requirements Traceability Matrix deliverables

DHS and the ASI agreed on a risk management approach for the Oracle-related security vulnerabilities, resulting in the associated IV&V finding being reduced from a medium to a low risk.

IV&V's primary risks remain in the following areas:

Testing and Defect Resolution:

- UAT is progressing, yet unresolved defects remain concentrated in critical areas, including eligibility determination, reporting, and correspondence. Environmental outages, delays in specialized testing (e.g., time travel) and recurring defects have added pressure to the project team and schedule. Performance testing is also still in progress, leaving limited time to address any issues identified before Pilot.
- Validation of batch processing results, reporting accuracy, and client correspondence is not yet complete. The project continues to resolve defects in reports, data conversion, and correspondence. Until testing and validation activities are completed, there remains a risk that important business functions may not perform as expected during Pilot operations, requiring additional workarounds, including file fixes.

Operational Readiness:
While M&O-focused UAT is validating ServiceNow functionality, important operational processes and procedures have not yet been fully defined, tested, or demonstrated. There is a risk that support processes and procedures, teams and business operations may not yet be prepared to effectively manage day-to-day operations, service requests, governance activities, and production support responsibilities.

The project team is committed to starting the pilot on time and has demonstrated positive progress. However, successful Pilot readiness will depend on demonstrating operational preparedness, resolving high-impact defects, and completing validation of critical business processes before deployment.

Executive Summary – 2

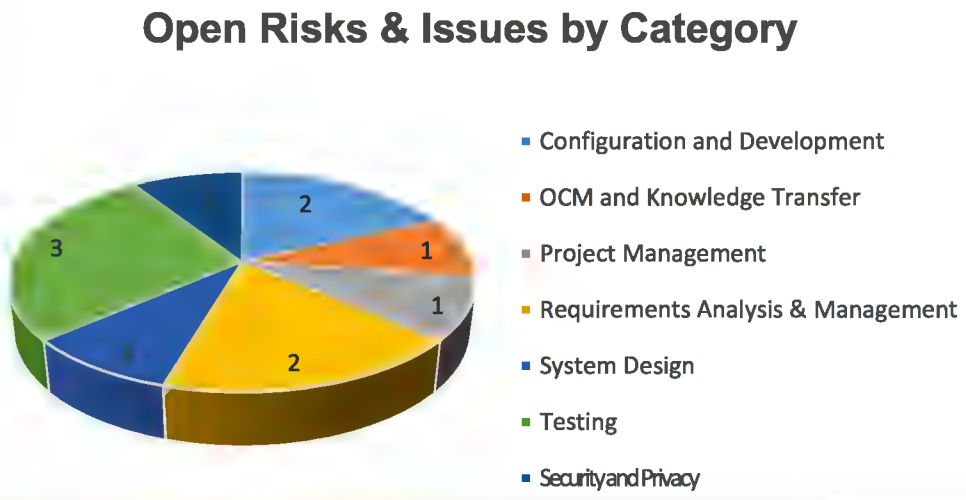
May	Jun	Jul	Category	IV&V Observations
M	M	M	Project Management	The planned second M&O-focused UAT started, focused on additional testing of the ServiceNow implementation. Both DHS and IV&V look for testing of the front to back business processes that utilize ServiceNow, to verify operational readiness for Pilot go-live.
L	L	L	System Design	Design sessions for the newly introduced Change Requests were conducted this month. IVV notes the sessions were organized and facilitated in a productive manner. However, the risk remains that introducing changes while UAT is in progress is not aligned to industry best practices as it may cause unplanned rework and new code may introduce defects on functionality that was previously tested successfully.
M	M	M	Configuration and Development	Development continued in July to support completion of Change Requests that will provide required functionality for Pilot. A key configuration management document started internal QA, prior to releasing to DHS for review. The date for moving to DHS review is currently not included in the M&O schedule.
M	M	M	Testing	UAT testing continues to advance across core BES functionality. While defect activity remains concentrated in Case Management, Reporting, and Correspondence, resolution efforts are progressing, including through reporting workgroups. Ongoing performance testing and new Change Requests (CRs) warrant continued monitoring through the remainder of UAT.
M	M	L	Security and Privacy	DHS and the ASI have agreed upon a revised risk management approach for open items that Oracle is responsible for resolving. Based upon the planned approach and compensating controls, IV&V is lowering the criticality rating for this finding to Low.
M	M	M	Requirements Analysis & Management	RTM report improvements were made this month. The automation required to maintain the correct status and provide the capability for DHS to validate the RTM is not yet complete. The RTM due date was extended to align with the UAT extension, increasing the risk that the FNA required RTM validation prior to Pilot may not be completed.
M	M	M	OCM and Knowledge Transfer	OCM activities continue to support BES Pilot readiness, including communications, Change Champion engagement, and readiness planning. IV&V is awaiting evidence of user adoption and training effectiveness to validate organizational preparedness.

IV&V Findings and Recommendations

IV&V Findings and Recommendations – chart 1

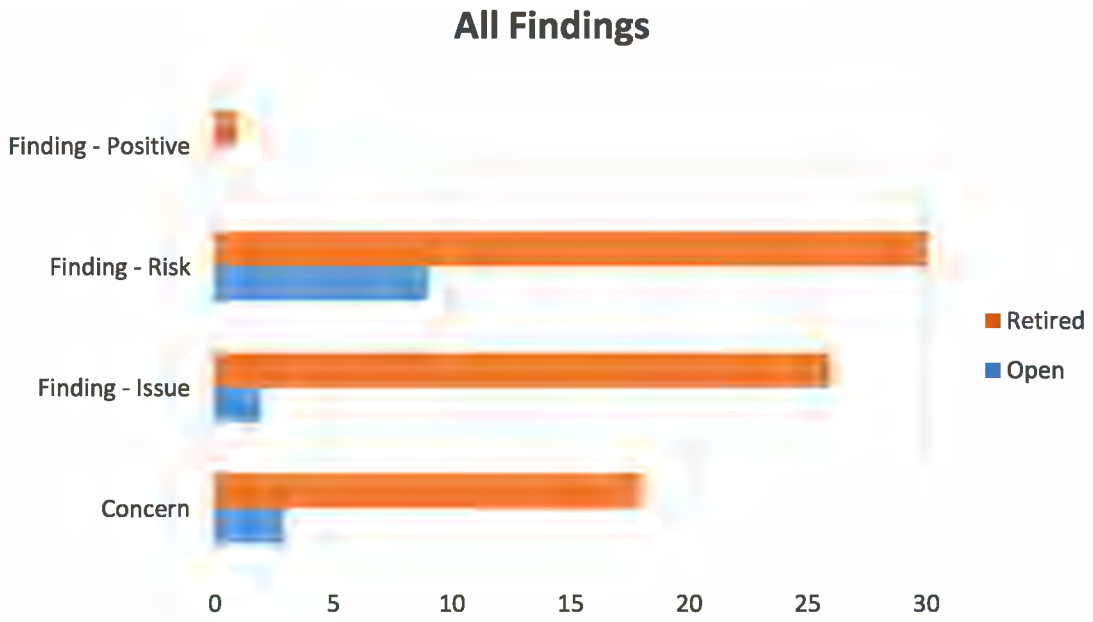
As of the July 2026 reporting period, PCG is tracking 11 open findings (9 risks, 2 issues) and has retired 89 findings. Of the 11 open findings, 10 are Medium, and 1 are Low.





IV&V Findings and Recommendations – chart 2

The following figure provides a breakdown of the 103 IV&V findings (positive, risks, issues, concerns) by status (open, retired).



IV&V Findings and Recommendations – 3

Findings Opened During the Reporting Period

#	Finding	Category
	None	

IV&V Findings and Recommendations – 4

Findings Retired During the Reporting Period

#	Finding	Category
	None	

IV&V Findings and Recommendations – 5

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** DHS has indicated ongoing concerns regarding the slower-than-expected pace of time travel testing and recurring disruptions resulting from environment downtime during business hours. Continued impacts to testing activities may reduce testing productivity and compress the remaining UAT schedule, reinforcing the importance of effective coordination and management of the time travel environment to support completion of planned testing activities.	Testing

IV&V Findings and Recommendations – 7

Preliminary Concerns Investigated During the Reporting Period

#	Finding	Category
118	**Preliminary Concern - The approach and testing results of data conversion indicate that issues may not be fully resolved prior to Pilot.** The latest conversion data refresh was completed on July 11, 2026. IVV did not observe a notable increase in conversion-related defects compared to the previous refresh event, and defect trends suggest several previously identified conversion-related defects may have been mitigated. However, end-of-month batch processing has not yet been validated for key conversion outcomes. Although no additional data refresh is planned, the need for future refresh activities remains dependent on UAT results and conversion validation outcomes. Therefore, this preliminary concern remains open for continued observation. IV&V also notes ongoing project discussions regarding legacy HAWI data quality and will continue monitoring any potential impacts to conversion validation activities and readiness efforts.	Data Management and Conversion

IV&V Findings and Recommendations – 8

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.** DHS and IV&V remained concerned that the Operational Processes needed at the start of the Pilot will not be available. The M&O team began the second round of UAT for the ServiceNow tool functionality, but DHS has clearly articulated that the business process layer - how program offices will interact with, validate, and close out service requests - has not been defined, communicated, or tested. Combined with a nearly year-long open item on batch handling and multiple foundational documents still incomplete, there is material risk that the M&O team may achieve technical tool readiness without operational process readiness.	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
• Survey the BES user community to confirm readiness for pilot in relation to possible training gaps.	In Process
• The ASI evaluate the remaining work and determine if additional resources are needed.	In Process

IV&V Findings and Recommendations – 9

System Design

#	Key Findings	Criticality Rating
	Risk – The planned BES infrastructure is complex, which could be difficult to implement and maintain, and could lead to schedule/cost impacts.	
73	The ASI has been troubleshooting a system outage defect that has affected multiple DHS Users in UAT. Several underlying sources have been explored, with changes made to try and resolve the defect. The ASI has not confirmed the root cause(s) so the defect may reside anywhere within the network through the BES application. DHS and the ASI is actively researching to identify and resolve the root cause(s).	

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 – 10

Configuration and Development

#	Key Findings	Criticality Rating
70	**Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution.** IVV notes positive progress in that the Configuration Management (CM) Procedures is fully drafted and is now in the ASI internal QA process. However, IV&V notes that demonstrated implementation (active Configuration Item (CI) tracking, baseline audits, configuration change control through ServiceNow) needs to be evidenced to address the key focus of this finding. With CM-specific workflows excluded from the second round of M&O UAT, this means validation will likely need to occur through a separate mechanism, which has not been communicated to IV&V.	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.	Not Started

IV&V Findings and Recommendations – 11

Configuration and Development

#	Key Findings	Criticality Rating
117	**Risk (Medium) - Limited visibility and validation of batch processing results, and a lagging defect remediation rate may impact pilot readiness.** Multiple batch processing reports were delivered to DHS, with review activities currently underway. Validation of processing results and record-level accuracy has not yet been confirmed. While batch defect remediation improved this month, IVV will continue to monitor remediation velocity relative to the defect creation rate, as the improved pace must be sustained within the UAT timeline.	M

Recommendations	Progress
• Implement interim batch validation reporting to enable ongoing visibility into processing results during UAT, before the August target report delivery.	In Progress
• Establish a targeted remediation plan to burn down high-impact batch defects to improve readiness for UAT exit.	In Progress
• Collaborate with BESSD Operations to assess potential impacts of unresolved batch defects and document operational response procedures for Pilot readiness.	Not Started

IV&V Findings and Recommendations – 12

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.** As UAT enters the second half of execution, IV&V has identified the following areas warranting continued attention and monitoring: • UAT execution continues to progress across core BES functionality; however, failed and in-progress tests remain concentrated within Eligibility Determination, Interview & Application, Renewals, and Reporting functionality. Defect activity remains similarly concentrated in Eligibility, Reporting, and Correspondence, which may increase remediation and retesting efforts during the remainder of UAT. • Access to supporting components (Secure Enclave and Case Activity History) continues to be delayed due to ongoing dependencies and readiness activities. Continued delays may reduce the time available to complete audit and security validations. • Automation-related defects continue to demonstrate an approximately 20% reintroduction rate within previous stable areas, including UI controls and Eligibility. The recurrence suggests opportunities to strengthen regression test robustness and coverage. With additional Change requests (CRs) progressing through the development lifecycle, demonstrating regression stability in lower environments remains key. • Performance testing remains in-progress, with the next comprehensive results expected next month. This leaves limited opportunity to address identified issues and complete any required validation activities as necessary. IVV will continue monitoring performance validation results to assess alignment with DHS expectations.	M

IV&V Findings and Recommendations – 13

Testing (Finding 83 continued)

#	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.**	M

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.	Closed.
• 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.	In Progress
• ASI to ensure traceability between new CRs and test coverage	New

IV&V Findings and Recommendations – 14

Testing

#	Key Findings	Criticality Rating
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.** As of July 31, 2026, high-priority reports had been identified for FMO, SNAP, TANF, and FAP, including 13 FMO reports, 22 SNAP reports, 10 TANF reports, and 12 FAP reports. One report had been generated and made available to DHS for review. Weekly report review sessions are planned through September 18, 2026, to conduct report validation and issue resolution. Report validation activities remain ongoing as DHS and ASI continue reviewing reporting requirements, data accuracy, and report output. As of July 31, 2026, approximately 61 report-related defects remained unresolved, while 26 report-related defects were closed or resolved during July 2026. Most open report-related defects are attributable to report query and filter logic issues, which result in reports pulling incorrect data or failing to identify qualifying records. A smaller portion of defects are related to field mapping and transformation issues, where reports identify the correct records but display inaccurate values. While progress is being made, the remaining unresolved defects and ongoing report validation activities indicate that additional work is needed to demonstrate reporting readiness before go-live.	M

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.	In Process

IV&V Findings and Recommendations – 15

Testing

#	Key Findings	Criticality Rating
119	**Risk – The lack of quality client correspondence may impact pilot readiness or clear eligibility and benefits communications to the BES clients.** While correspondence remediation efforts remained ongoing, the overall correspondence defects increased as new and reopened items were identified; however, monthly new defect creation decreased from June to July, and executed correspondence-related tests reflected a high pass rate. Correspondence defects continue to affect notice generation, data population, notice triggering logic, and template formatting across multiple functional areas. As documented in Issue #75 (BES Correspondence Quality), there are currently 215 BES correspondence items and 1 Secure Enclave correspondence item. Correspondence-specific test execution records include 115 unique correspondence items in SIT and 22 unique correspondence items in UAT. While progress is being made, the volume and variety of unresolved correspondence defects and the limited number of correspondence items reflected in correspondence-specific testing indicate that additional work is needed to demonstrate correspondence readiness before pilot.	M

Recommendations	Progress
• Identify correspondence-related defects where the root cause may be due to BES processing errors.	In Process
• Continue prioritizing the remediation and validation of correspondence-related defects to ensure identified defects are resolved and support correspondence readiness.	In Process
• Establish a structured correspondence working session to validate correspondence requirements, notice content, testing coverage, and defect resolution activities, and to support prioritization of correspondence issues affecting notice generation, data accuracy, and notice triggering logic for client-facing communications.	New

IV&V Findings and Recommendations – 16

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.** As of July 31st, 2026, BES had 45 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 96 high-rated findings in an open state outside the 30-day remediation timeframe, and 30 high-rated findings were within the timeframe. On July 15th, 2026, ASI and DHS reached agreement on a revised risk management approach for Oracle-related deferred Plans of Action and Milestones (POAMs). Under this approach, residual risk is evaluated based on the effectiveness of compensating controls and ongoing continuous monitoring activities, which collectively reduce the overall risk exposure. The approach applies to the remaining High and Critical findings for which Oracle does not provide security patches to customers using the Standard Base Database Service currently utilized by BES. These POAMs will be designated as "Monitoring - Vendor Constrained" under the updated POAM classification framework. Based on the implementation of compensating controls, continuous monitoring measures, and the agreed-upon risk management strategy, IV&V has reassessed and lowered the associated risk rating from its previous level to Low.	L

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 – 17

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.** While progress was made in July, 2026 including: (1) (automation issue fixed that is needed to maintain correct status of requirements, (2) RTM reporting format completed and approved by DHS, (3) active count of requirements reduced from 890 to 850), the primary focus of this risk exists. The RTM has significant limitations - requirements traced to epics rather than use cases lack automated validation, and IV&V's review of historical approval files revealed gaps in confirming requirement splits. The extended timeline through September 2026, to align with UAT extension, suggests this validation capability may not be fully resolved before pilot – potentially impacting FNA approval to start 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 – 18

Requirements Analysis & Management

#	Key Findings	Criticality Rating
108	**Issue - Unplanned federally mandated system requirements could lead to project delays and increase the project budget.** No new federally mandated requirements or concerns were raised during 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 – 19

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** Operational OCM activities (BES Buzz newsletter, Change Champions meetings, readiness meetings) are occurring to support the preparation of DHS organization for the BES Pilot implementation. IV&V is awaiting receipt of evidence that demonstrates progress in user adoption, via tools such as a follow-up BES user survey; and user preparation via documentation of BES training outcomes.	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
• DHS and ASI 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
• DHS and ASI provide training with users that show direct correlation between how users currently perform work in HAWI and how they will perform the same work in BES	In Process

IV&V Status

IV&V Engagement Status

IV&V Engagement Status				
IV&V Engagement Area	**May**	**June**	**July**	**Comments**
IV&V Budget				
IV&V Schedule				
IV&V Deliverables				PCG submitted the final June 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 July reporting period:
  - Completed – June 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 August 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	07/04/2026, 07/11/2026, 07/18/2026, 07/25/2026	N/A
BI-02 Project Status Report	07/01/2026, 07/08/2026, 07/15/2026, 07/22/2026, 07/29/2026	N/A
BES Disaster Recovery Plan	07/27/2026	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 – 7/06/2026, 7/13/2026, 7/20/2026, 7/27/2026
2. HI DHS BES April Draft IV&V Report Review – 7/15/2026
3. BI-Weekly DHS BES PMO/IV&V Check-in – 7/02/2026, 7/16/2026, 7/31/2026
4. Weekly BES Infrastructure meeting – 7/10/2026, 7/17/2026, 7/24/2026, 7/31/2026
5. Weekly Client BES 2023 Project Status Meeting – 7/8/2026, 7/22/2026
6. Security Touchpoint – 7/01/2026, 7/6/2026, 7/15/2026, 7/22/2026
7. (External) Bi-weekly BES CCB Meeting – 7/8/2026, 7/22/2026
8. (External) Vimo Current Monthly Checkpoint – 7/7/2026
9. (External) BES M&O Working Group – 07/1/2026, 7/8/2026, 7/15/2026, 7/22/2026
10. (External) BES Readiness/BI-29 Updates – 7/13/2026, 7/27/2026
11. eWorld/IV&V Mid-Month Check-in – 7/20/2026
12. (External) BES: FNA Connect – 07/02/2026, 7/9/2026, 7/16/2026, 7/23/2026, 7/30/2026
13. (External) Daily UAT Touchpoint Meeting – Daily Meeting every workday
14. (External) BES: Change Champions Touchpoint – 7/24/2026
15. (External) Training Status Updates – 7/9/2026, 7/23/2026
16. (External) Reports Specification Documentation Review Day 1 CR2026-059 BES FMO Summer EBT Program – 7/21/2026
17. (External) JAD CR2026-056 BES-SSP Integration – 7/21/2026, 7/23/2026, 7/28/2026
18. (External) BES UAT Priority Reports Working Session – 7/31/2026

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 – 1

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 – 2

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



Solutions that Matter

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
119	The lack of quality client correspondence may impact pilot readiness or clear eligibility and benefits communications to the BES clients	Mezina, Jekaterina	Finding - Risk	6/25/2026	Testing	Correspondence-related defects continue to be identified during UAT, with defect volume increasing in June and a significant number of defects remaining unresolved. The defects include formatting and display errors, incorrect or missing data, missing required verbiage or sections, notices failing to generate, and functional issues affecting correspondence creation or review. Analysis of the reported defects indicates that code-related errors are the primary driver of the identified correspondence defects.	Correspondence represents formal client communications issued through BES, including notices related to eligibility, benefits, and required client actions. Correspondence defects may affect the accuracy, completeness, and timely delivery of notices used to communicate eligibility decisions, benefit actions, appeal rights, and required client information. If unresolved before go-live, these issues could create compliance risks, increase beneficiary confusion, undermine confidence in program communications, and result in additional operational workload or appeals.	Identify correspondence-related defects where the root cause may be due to BES processing errors. Continue prioritizing the remediation and validation of correspondence-related defects to ensure identified defects are resolved and support correspondence readiness for pilot. Establish a structured correspondence working session to validate correspondence requirements, notice content, testing coverage, and defect resolution activities, and to support prioritization of correspondence issues affecting notice generation, data accuracy, and notices triggering logic for client-facing communications.	1	3	3	Med	Open	07/31/2026 - While correspondence remediation efforts remained ongoing, the overall correspondence defects increased as new and reopened items were identified; however, monthly new defect creation decreased from June to July, and executed correspondence-related tests reflected a high pass rate. Correspondence defects continue to affect notice generation, data population, notice triggering logic, and template formatting across multiple functional areas. As documented in issue #75 (BES Correspondence Quality), there are currently 215 BES correspondence items and 1 Secure Enclave correspondence item. Correspondence-specific test execution records include 115 unique correspondence items in SIT and 22 unique correspondence items in UAT. While progress is being made, the volume and variety of unresolved correspondence defects and the limited number of correspondence items reflected in correspondence-specific testing indicate that additional work is needed to demonstrate correspondence readiness before pilot.		
118	The approach and testing results of data conversion indicate that issues may not be fully resolved prior to Pilot.	Ho, Justin	Concern	6/25/2026	Data Management and Conversion	Two data refreshes have been completed for UAT to date, with additional refreshes planned for July and August. This approach reflects proactive coordination by DHS and the ASI to improve data quality in the UAT environment. The most recent June refresh resulted in an increase in identified defects, raising concerns regarding data accuracy and the overall effectiveness of the refresh approach. While the refreshes are intended to support defect resolution, there is a risk that may continue to introduce new issues, potentially offsetting remediation progress. The SI has updated deployment measures for the upcoming July data refresh and plans to validate whether these changes are effective during that cycle. This dynamic may impact the ability to achieve stable test conditions and could place additional pressure on the UAT timeline as testing progresses.	Ongoing data refreshes that introduce new defects may reduce confidence in data integrity and test stability during UAT. This may limit the ability to fully validate end to end scenarios and could delay overall test completion if defect resolution progress is offset by new issues.	NEW: Establish validation checkpoint following each data refresh to assess data accuracy and defect impact before resuming full UAT execution.	UAT	2	3	Med	Open	7/31/26: The latest data refresh was completed on July 11, 2026. IVV did not observe a notable increase in conversion-related defects compared to the previous refresh event, and defect trends suggest several previously identified conversion-related defects may have been mitigated. However, end-of-month batch processing has not yet been validated for key conversion outcomes. Although no additional data refresh is planned, the need for future refresh activities remains dependent on UAT results and conversion validation outcomes. Therefore, this preliminary concern remains open for continued observation. IVV also notes ongoing project discussions regarding legacy HAWI data quality and will continue monitoring any potential impacts to conversion validation activities and readiness efforts.		
117	Limited visibility and validation of batch processing results and a lagging remediation rate may impact pilot readiness	Ho, Justin	Finding - Risk	6/25/2026	Configuration and Development	A detailed batch processing report—intended to provide record-level results (e.g. successfully processed, failed, errored) is under development by the ASI and is expected in August. toward the end of UAT. While requested by DHS to support validation of processing accuracy, the reporting available today does not provide sufficient detail (e.g. record-level results or counts) to enable objective validation. As UAT approaches it is midpoint, remediation of batch-related defects has slowed. Based on the current defect creation and resolution trends, the ASI is not projected to resolve all batch defects by UAT completion. Approximately 30% (7 of 22) of these defects are High severity/priority and are expected to be resolved prior to UAT exit. To remain on track, the defect resolution rate would need to increase significantly (roughly triple). Additionally, reliance on allowable thresholds for Medium and Low severity defects alone may not be sufficient to demonstrate overall batch stability, given their potential cumulative impact on processing accuracy.	Limited visibility into batch processing outcomes reduces confidence in UAT completeness and the ability to validate processing accuracy. Coupled with a lagging defect remediation rate—particularly for High severity defects—there is an increased risk of not meeting UAT exit criteria and carrying unresolved issues into subsequent phases, potentially impacting system stability and readiness.	OPEN -Collaborate with BESD Operations to assess potential impacts of unresolved batch defects and document operational response procedures for Pilot readiness. ONGOING -Implement interim batch validation reporting to enable ongoing visibility into processing results during UAT, before the August target report delivery. -Establish a targeted remediation plan to burn down high-impact batch defects to improve readiness for UAT exit.	UAT	3	3	Med	Open	7/31/26: Multiple batch processing reports have been delivered to DHS, with review activities currently underway. Validation of processing results and record-level accuracy has not yet been confirmed. While batch defect remediation improved this month, IVV will continue to monitor remediation velocity relative to the defect creation rate, as the improved pace must be sustained within the UAT timeline. 6/30/26: IVB's review of batch related defect trends indicates that the fix rate has been declining and consistently lagging behind the defect creation rate since the start of UAT. Based on current trajectory, projected defect inflow combined with existing resolution pace suggests that not all defects may be addressed within the UAT timeline. As this pace, the SI would need to accelerate remediation efforts to remain on track for timely completion. In parallel, a batch control report requested by DHS is currently in development by the SI and is expected to provide greater visibility into batch processing records. However, with a targeted completion in August – toward the end of UAT – there is a risk that the window to fully leverage this reporting for validating batch processing accuracy may be limited.		
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 report 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 (#29) 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	07/31/2026 - As of July 31, 2026, high-priority reports had been identified for FMO, SNAP, TANF, and IAP, including 13 FMO reports, 22 SNAP reports, 10 TANF reports, and 12 FAP reports. One report had been generated and made available to DHS for review. Weekly report review sessions are planned through September 18 to support continued report validation and issue resolution. Report validation activities remain ongoing as DHS and ASI continue reviewing reporting requirements, data accuracy, and report output. As of July 31, approximately 61 report-related defects remained unresolved across various statuses, while 26 report-related defects were closed or resolved during July. The majority of open report-related defects are attributable to report query and filter logic issues, which result in reports pulling incorrect data or failing to identify qualifying records. A smaller portion of defects are related to field mapping and transformation issues, where reports identify the correct records but display inaccurate values. While progress is being made, the remaining unresolved defects and ongoing report validation activities indicate that additional work is needed to demonstrate reporting readiness before go-live. 06/30/2026 - As of June 18, 2026, reporting outputs required for validation had not yet been generated, preventing DHS from validating reports and resulting in no reporting working sessions being held over the preceding two weeks. DHS identified 10 priority reports for FMO review, providing a clear starting point for validation once reporting outputs become available. On June 24, 2026, the ASI reported that priority FMO reports would be provided to DHS for review, with subsequent working sessions planned to address feedback and any resulting defects. IVB/V continues to observe reporting challenges related to project risk #73, and progress in report testing remains limited due to the lack of available outputs.		7/15/2026 (Regarding exec sum) 2nd Bullet: "there is a higher defect rate for reports and correspondence. The quality issues have been raised via DHS project issues (#73, #75). A plan by the ASI to form a reporting group to review reports has not been met, as the ASI cannot generate the high-priority reports requested by DHS for review."Yellow highlight above – I'm not sure where this observation originated, but the information is inaccurate, particularly regarding the generation of high-
114	Incomplete BES M&O operational processes and procedures prior to UAT and Pilot may leave the project unready for statewide implementation.	Mollins, 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.	- Establish 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. - Survey the BES user community to confirm readiness for pilot to identify enhanced or new user training needs. - The ASI evaluate the remaining work and determine if additional resources are needed.	Now	3	3	Med	Open	7/31/2026 - DHS and IVB/V remained concerned that the Operational Processes needed at the start of the Pilot will not be available. The M&O team began the second round of UAT for the ServiceNow tool functionality, but DHS has clearly articulated that the business process layer - how program offices will interact with, validate, and close out service requests - has not been defined, communicated, or tested. Combined with a nearly year-long open item on batch handling and multiple foundational documents still incomplete, there is material risk that the M&O team may achieve technical tool readiness without operational process readiness. 6/30/2026 - IVB/V continues to be concerned about the volume of work in progress for the BES M&O workstream, with additional delays to the task in the project schedule each week. Additionally -Two key vendor M&O resources left the project, without any time for knowledge transfer, requiring the project manager to take on additional work without any preparation. - During the weekly workgroup calls, actions items continue to be delayed without any updates. - In the most recent workgroup call, DHS raised a concern that all the focus has been around ServiceNow implementation, and that other elements of M&O need to start getting attention in preparation for the next M&O UAT and Pilot. The ASI may need to allocate additional resources (both replacements for the two that left plus others working on ODI tasks) to keep this workstream on schedule. 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 IVB/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 5/30/26 to 8/4/26), thereby compressing the timeline available to complete the full M&O scope		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. IVB/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 shows the "interim"

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
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.	OPEN: - 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	UAT	3	3	Med	Open	7/31/26: DHS has indicated ongoing concerns regarding the slower-than-expected pace of time travel testing and recurring disruptions resulting from environment downtime during business hours. Continued impacts to testing activities may reduce testing productivity and compress the remaining UAT schedule, reinforcing the importance of effective coordination and management of the time travel environment to support completion of planned testing activities 6/30/26: A recent issue impacted the ability to simulate future dates due to an infrastructure change, highlighting a gap in environment readiness validation. The ASI identified the root cause and is actively implementing corrective actions. Given the limited occurrence of similar issues and proactive management, the condition appears manageable. IVV will continue to monitor but does not recommend escalation to a formal risk at this time. 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		
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 - DHS and ASI 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. - DHS and ASI 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. 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	6/30/2026 - IV&V continues to observe improved focus on OCM and readiness, from both DHS and the ASI. The BI-34 is being published consistently and approved by DHS, which clarifies the OCM efforts for all stakeholders. 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 - IV&V 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.		7/15/2026 The category is still a Medium/Would like to know from IV&V what actions are expected from ASI to reduce this to l. 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
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 clauses, 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	6/10/2026 - No new federally mandated requirements or concerns were raised in this reporting period. 05/31/2026 - No new federally mandated requirements or concerns were raised this reporting. 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 contract costs. 10/30/2025 - The local and Nutrition Services (FNS)		
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.	IN 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. 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	2	Low	Open	7/31/2026– As of July 31st, 2026, BES had 45 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 96 high-rated findings in an open state outside the 30-day remediation timeframe, and 30 high-rated findings were within the timeframe. On July 15th, 2026, ASI and OHS reached agreement on a revised risk management approach for Oracle-related deferred Plans of Action and Milestones (POAMs). Under this approach, residual risk is evaluated based on the effectiveness of compensating controls and ongoing continuous monitoring activities, which collectively reduce the overall risk exposure. The approach applies to the remaining High and Critical findings for which Oracle does not provide security patches to customers using the Standard Base Database Service currently utilized by BES. These POAMs will be designated as "Monitoring - Vendor Constrained" under the updated POAM classification framework. Based on the implementation of compensating controls, continuous monitoring measures, and the agreed-upon risk management strategy, IV&V has reassessed and lowered the associated risk rating from its previous level to Low. 6/30/2026– As of June 30th, 2026, BES had 38 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 9 critical findings were within the timeframe. BES had 91 high-rated findings in an open state outside the 30-day remediation timeframe, and 17 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. Last month, it was reported that at the end of May 2026, Oracle would deliver a Critical Security Patch Update (CSPU) monthly. However, monthly CSPUs are not available with the Standard Base Database Service that BES currently uses, unless a Custom		9/12/2025 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 delays". We have an

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
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	7/31/2026 - While progress was made in July, 2026 including: (1) (automation issue fixed that is needed to maintain correct status of requirements, (2) RTM reporting format completed and approved by DHS, (3) active count of requirements reduced from 890 to 850), the primary focus of this risk exists. The RTM has significant limitations - requirements traced to epics rather than use cases lack automated validation, and M&V's review of historical approval files revealed gaps in confirming requirement splits. The extended timeline through September 2026, to align with UAT extension, suggests this validation capability may not be fully resolved before pilot – potentially impacting FNA approval to start Pilot. 6/30/2026 - The ASI continue to work on finalizing the disposition of all requirements for BES. This was planned to be completed and reviewed at the CCB meeting on 6/17/2026, but that meeting was cancelled as the work was not completed and the meeting pushed out to 6/24/2026. The ASI provided updates on progress at 6/24/2026 meeting but work still remains to get all requirements to the right disposition. These issues will need to be resolved to allow DHS and IVV to validate the disposition of all requirements prior to Pilot. 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. 4/30/2026 - 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		3/12/2026 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. 12/11/2025 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 strike this from your