JOSH GREEN, M.D.
GOVERNOR
KE KIA'ĀINA

KEITH A. REGAN
COMPTROLLER
KA LUNA HO'OMALUHANA LAULĀ

CHRISTINE M. SAKUDA
CHIEF INFORMATION OFFICER
LUNA 'ENEHANA

DEPT. COMM. NO. 175

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

OFFICE OF ENTERPRISE TECHNOLOGY SERVICES | *KEʻENA HOʻOLANA ʻENEHANA*

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

December 23, 2025

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

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

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

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

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

Sincerely,

Christine M. Sakuda
Chief Information Officer
State of Hawaiʻi

Attachments (2)

Hawaii Department of Human Services Systems Modernization Project

Final IV&V Status Report
for Reporting Period November 1 – 30, 2025

Submitted: December 12, 2025

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Overview

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Executive Summary

Executive Summary

The BES project team continues to execute System Integration Testing (SIT), develop training materials, plan Organizational Change Management (OCM) activities and tasks, and prepare for the Pilot Implementation.

The development of a revised project schedule, which began in October, continued throughout the reporting period. Updates to the requirements for two existing Change Requests (CRs) to address Federal mandates (HR1) and a new CR have impacted the finalization of the schedule. IV&V recommended that the ASI and DHS leverage the knowledge gained and lessons learned regarding challenging areas of the current schedule, such as the limited time for reviewing key deliverables, and tasks that had experienced large delays, when developing the revised schedule.

The IV&V team considers the current primary areas of risk for the project as Requirements Management, Testing, and Project Management.

Requirements Management:

- Work remains for both the ASI and DHS to complete their work to finalize all requirement refinement work, with 160 requirements not mapped at the end of the reporting period.
- The ASI had targeted to deliver an interim RTM to DHS on November 26th, 2025, but was unable to due to outstanding requirement work and staff diverted to review the revised FNS SIRT deliverable; no new target date has been provided.

Testing:

- End-to-End (E2E) testing is scheduled to be completed on December 12, 2025, yet 46% of the E2E test cases were in a passed status as of the end of the reporting period.

Project Management:

- Delays in finalizing the revised schedule is impacting both DHS and the ASI's ability to schedule and allocate resources for the current workloads, new work as described in the Change Requests, and the unknown resource needs/allocations to support the remaining work on the BES DDI project and preparing for Production via the Maintenance and Operations scope of work and schedule. With a subset of staff members supporting both projects, it is crucial that DHS and the ASI have the necessary resources identified in the schedules.

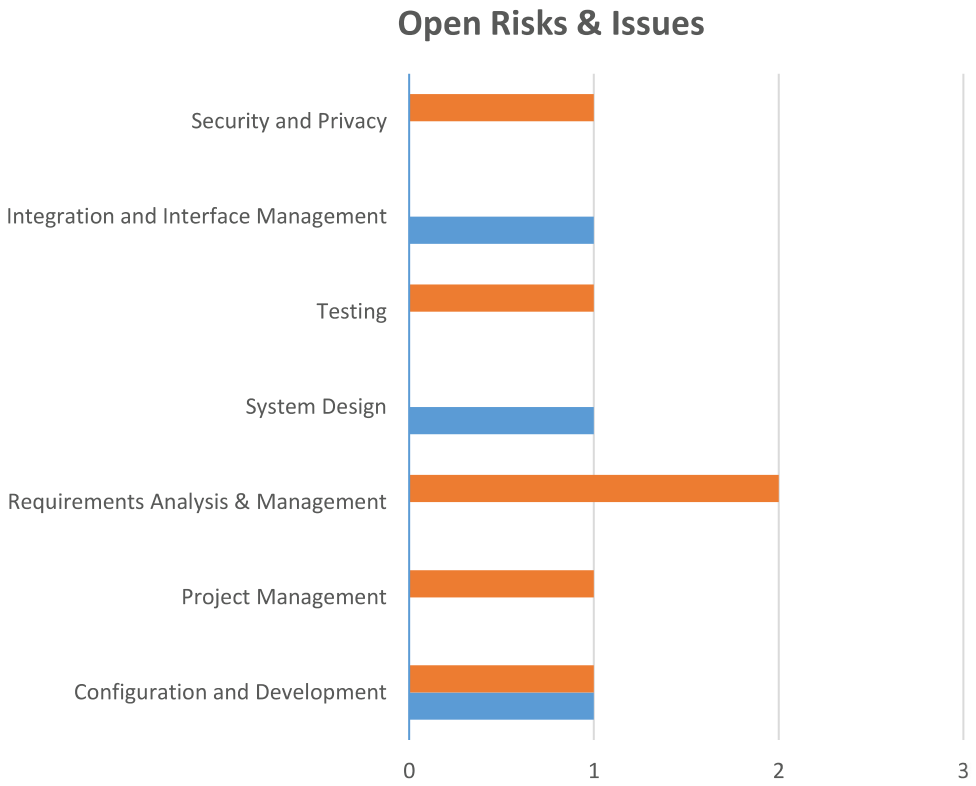
Executive Summary

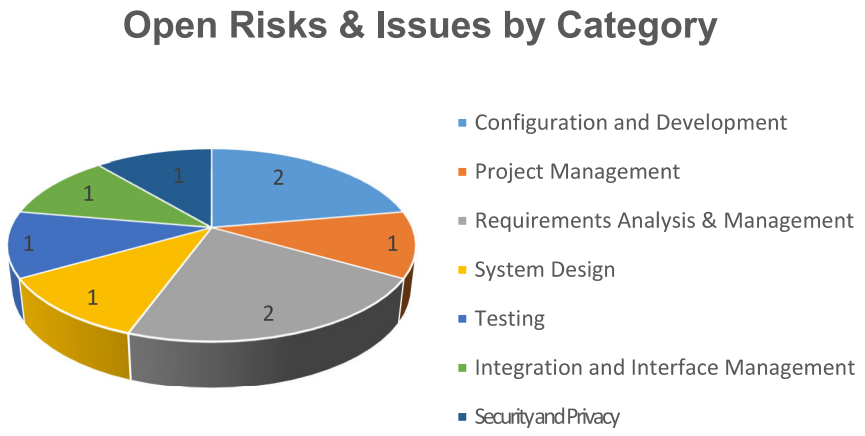
Sept	Oct	Nov	Category	IV&V Observations
L	L	L	System Design	The system design continue, albeit at a slower rate. The ASI is reporting they are beginning performance and stress testing activities along with Disaster Recovery. As these activities progress, further changes to the design may be necessitated.
M	M	M	Configuration and Development	IV&V is working with the ASI and DHS to gain insight as to the root cause of the issues and defects. Ideally, any lessons learned would be applied to the DDI plan and schedule to strengthen the project team's probability to meet the target dates in the revised schedule
L	L	L	Integration and Interface Management	Due to ASI resource constraints, completion of the technical interface testing has been extended beyond the current completion of SIT, limiting opportunities for defect resolution and retesting prior to UAT.
M	M	M	Testing	The team reduced the outstanding blocked SIT tests from approximately 30% in October to 23% by the end of November, although key areas, such as Eligibility and SSP, still drive unexecuted tests. E2E testing progress remains limited with only 46% passing, as defects persist in Reports, the Self-Service Portal, and Accessibility. The ASI has committed to completing SIT by December 12, 2025.
M	M	M	Security and Privacy	Progress continues to be made on the Security and Privacy findings; however, there are still findings that are not resolved within the target timeframes as defined in the Security Plan.
M	M	M	Requirements Analysis & Management	DHS and ASI continue to work on the requirement traceability deliverable. The target date for the interim RTM was not met by the ASI, and they have yet to publish a revised target date. Additionally, new requirements to support the OBBBA and other Change Requests are currently being defined by the project team.
	M	M	Project Management	The ASI is working on the revised project schedule. Until the schedule is published and approved by DHS, the project team will continue to use the current schedule.

IV&V Findings and Recommendations

IV&V Findings and Recommendations

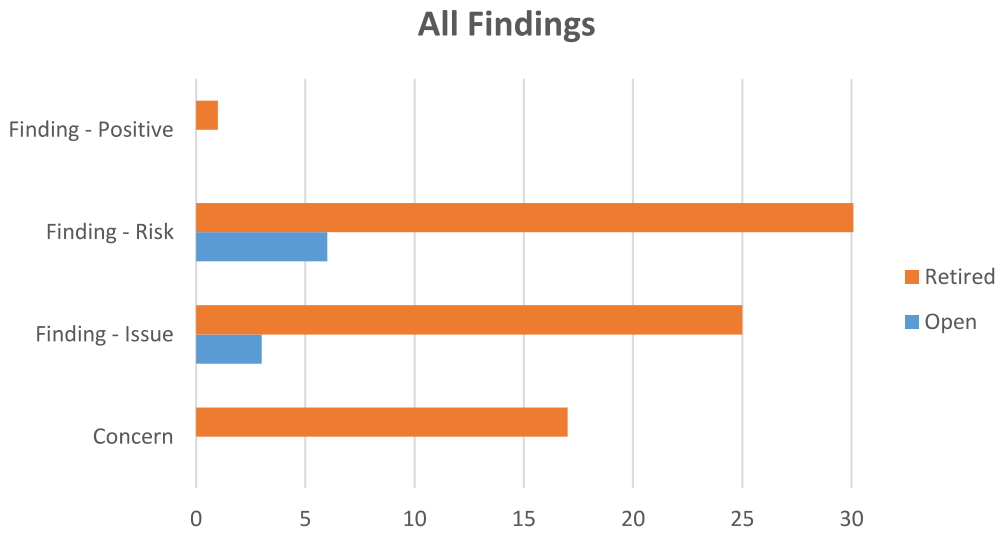
As of the November 2025 reporting period, PCG is tracking 9 open findings (6 risks, 3 issues) and has retired 85 findings. Of the 9 open findings, 6 are Medium, and 3 are Low.





IV&V Findings and Recommendations

The following figure provides a breakdown of the 94 IV&V findings (positive, risks, issues, concerns) by status (open, retired).



IV&V Findings and Recommendations

Findings Opened During the Reporting Period

#	Finding	Category
NA		

IV&V Findings and Recommendations

Findings Retired During the Reporting Period

#	Finding	Category
110	**Risk - The US Federal Government Shutdown may delay the BES project** With the Government shutdown ending on November 12, 2025, DHS has stated there are not further impacts to the BES project, therefore IV&V is retiring this finding. DHS and the ASI are discussing the potential impact of the shutdown on the project schedule and funding for the BES project.	Project Management

IV&V Findings and Recommendations

Project Management

#	Key Findings	Criticality Rating
109	**Risk - Lack of a current BES Maintenance & Operations (M&O) Schedule may Impact the ability of DHS and the ASI to manage the M&O work effectively** As of the end of the reporting period, a revised M&O schedule has not been provided to the project team. The ASI plans to finalize a revised DDI schedule in December, which will align with the updates being made to the M&O schedule. DHS has raised a M&O Schedule project risk which elaborates on the same concerns raised in this finding. Continued delays in clarifying the work/resources required by the ASI and DHS for M&O, may result in overallocation of staff resources for both the BES M&O and DDI activities, meaning planned work would not be completed as agreed upon in the schedule.	M

Recommendations	Progress
• Update the M&O schedule to reflect current project timelines, resource commitments, and operational readiness activities based on estimates developed by the staff that will perform that work.	In Process
• Establish a formal process for periodic review and validation of the M&O schedule with all relevant stakeholders.	In Process
• Ensure the M&O schedule is integrated into the overall DDI project schedule and implementation readiness plans to show overlap of resource needs, tasks and activities	In Process
• Maintain alignment between development, operations, and DDI project management teams by creating cross-functional meetings that include team members from each silo to ensure consistent, timely communication thereby aiding in the change management processes. ASI maintain a detailed schedule for DevOps implementation tasks to avoid unexpected delays that could delay project milestones and the critical path.	In Process

IV&V Findings and Recommendations

System Design

#	Key Findings	Criticality Rating
73	**Risk – The planned BES infrastructure is complex, which could be difficult to implement and maintain, and could lead to schedule/cost impacts.** The ASI has rolled back the Bindplane software updates that created issues with the LINUX servers. With the former NXLog tool used to monitor the servers back in use, the ASI has time to work on a resolution.	L

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

IV&V Findings and Recommendations

Configuration and Development

#	Key Findings	Criticality Rating
70	**Risk – Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution.** The ASI has communicated: • Progress is being made on completing a configuration management plan since February 2025. • Configuration management was implemented in July 2025 However, a document that clearly states how configuration management has been implemented and how it will be managed has not been provided. DHS requires this plan to enable DHS and the ASI to agree on the full list of items that are included and their management, in preparation for the Pilot implementation, Statewide Rollout, and follow-on Production Support activities.	L

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

IV&V Findings and Recommendations

Configuration and Development

#	Key Findings	Criticality Rating
80	**Issue – Development delays have negatively impacted the project schedule and delayed go-live.** The ASI has reported SIT defects, which include the areas of Batch processing, Reports, Correspondence, and Data Conversion. IV&V is analyzing these defects to understand any relationship to the development team's performance or if other factors are causing these issues. A root cause analysis of the defects by the ASI, which includes DHS and IV&V, would be useful. Additional change requests requiring development, primarily to meet federal mandates (HR1), are resulting in schedule adjustments. Once the new schedule is released, IV&V will evaluate the ASI estimates and the level of detail provided to complete this development work.	M

Recommendations	Progress
• ASI provides DHS with the time needed to effectively evaluate the software demonstrations (demos) and elicit productive design discussions with DHS attendees during each demo.	In Process
• The project closely monitor progress on development efforts and create a mitigation strategy to avoid delays.	In Process

IV&V Findings and Recommendations

Integration and Interface Management

#	Key Findings	Criticality Rating
93	**Risk – Due to the lack of physical and technical (Transport Layer) testing of the interfaces and data transfer failure, conditions may exist with data format, boundaries, and dependencies. These failures may result in intermittent and hard-to-isolate problems or errors.** Technical interface testing for file-based transfers continues, with approximately 52% of planned tests completed (111 of 211). There is a total of 25 shared and BES-specific interfaces. The ASI communicated that, due to ASI resource constraints, the remaining tests will not be completed by the original target date of December 12, 2025. Completion has been extended to align with the rescheduled end of System Integration Testing (SIT). IV&V notes that the revised timeline continues to limit opportunities for defect resolution and retesting before UAT. The project team should maintain focus on completing and retesting all remaining failure-condition scenarios to mitigate this finding's risk.	

Recommendations	Progress
• API interfaces should be tested for failure conditions during connection and transfer operations.	In Process
• FTP and file interfaces should be tested for data and file integrity.	In Process
• Test data fields for system impacts resulting from data that is poorly formatted, out of range, or other unexpected data transmission errors.	In Process

IV&V Findings and Recommendations

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.** The percentage of outstanding blocked SIT tests decreased from approximately 30% in October to 23% by the end of November. Remaining blocked tests are in key areas of Eligibility and the Self-Service Portal (SSP), which also contain the volume of unexecuted tests. End-to-end (E2E) testing progress remains a concern, with 46% of tests passing to date, highlighting ongoing challenges with system readiness, cross-module integration (Case Management, Application Management, Financial Management), and overall platform stability. Defects continue to be concentrated in problematic areas of SSP, Accessibility functionality, and Eligibility—these areas also include a number of the reopened defects. The ASI has reaffirmed its commitment to completing SIT by the targeted date of December 12, 2025. This does not include the ongoing change request work.	M

Recommendations	Progress
• DHS and ASI revisit the testing approach to prioritize completion of remaining test activities and conduct comprehensive System Integration testing (SIT) to minimize defect leakage to User Acceptance Testing (UAT).	In Process
• ASI test team provide a visual of progress of test case execution compared to current testing schedule.	In Process

IV&V Findings and Recommendations

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 November 30th, 2025, BES had 11 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 1 critical finding was within the timeframe. BES had 27 high-rated findings in an open state outside the 30-day remediation timeframe, and 29 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 14 critical findings and 33 high findings from 2024 are listed as deferred, which are part of the Oracle Cloud Infrastructure that Oracle is responsible for patching quarterly.	M

Recommendations	Progress
• Implement an escalation process to involve senior leadership if deadlines are missed.	In Process

IV&V Findings and Recommendations

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.** DHS and the ASI conducted three additional collaborative working sessions to continue reviewing contract requirements that remain untraced or unfulfilled. The objective is to ensure all project requirements are accurately mapped, supporting complete and reliable traceability within the JIRA tool used to generate the Requirements Traceability Matrix (RTM) deliverable. As of July 17, 2025, out of the 2,971 requirements for the project, a total of 741 unmapped requirements were identified that were not mapped properly. Of these unmapped requirements, 581 have been reconciled, with 160 that remain outstanding, and are currently being reviewed by DHS. The ASI planned to deliver an interim RTM on November 3, 2025. Due to the System Integrity Review Tool (SIRT) project revisions taking priority, the interim RTM delivery date for DHS was changed to November 26, 2025. Further delays will minimize the time DHS has to review and approve the RTM to ensure that all necessary BES functionality and supporting components have been developed and can be traced from the contract through development, testing and User Acceptance Testing with test cases linked to validate traceability.	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

Requirements Analysis & Management

#	Finding	Category
108	**Issue - Unplanned federally mandated system requirements could lead to project delays and increase the project budget.** The Food and Nutrition Services (FNS) organization is back to working with the government shutdown ending and clarification on the SNAP requirement changes continues to be an issue. Without clear guidance from FNS for the requirements needed to finalize the Change Requests (CRs) there may be additional schedule delays and increased project costs.	L

Recommendations	Progress
• Build in contingency in schedule to account for possible new requirements being introduced that must be part of the initial implementation of BES.	New
• Pursue all communication channels that could provide early, and validated, information on possible requirements being sent out to the States.	New

IV&V Status

IV&V Engagement Status

IV&V Engagement Area	Sept	Oct	Nov	Comments
IV&V Budget				
IV&V Schedule				
IV&V Deliverables				PCG submitted the final October IV&V Monthly Status Report.
IV&V Staffing				Michael Fors has been offboarded from the IV&V team
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 November reporting period:
  - Completed – September 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 December 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	11/05/2025, 11/12/2025, 11/19/2025, 11/26/2025	N/A
BI-02 Project Status Report	11/05/2025, 11/12/2025, 11/19/2025, 11/26/2025	N/A
CR2025-040 ABAWD and SNAP Work Requirements Updates Functional Design	11/12/2025	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 – 11/3/2025, 11/10/2025, 11/17/2025, 11/24/2025
2. IV&V/ASI October Pre-draft Review – 11/5/202
3. HI DHS BES June Draft IV&V Report Review – 11/14/2025
4. BI-Weekly DHS BES PMO/IV&V Check-in – 11/6/2025, 11/21/2025
5. Weekly BES Infrastructure meeting – 11/7/2025, 11/14/2025, 11/21/2025
6. Weekly Client BES 2023 Project Status Meeting – 11/5/2025, 11/12/2025, 11/19/2025, 11/26/2025
7. Security Touchpoint – 11/5/2025, 11/12/2025
8. (Externa(l) Weekly Interfaces Touchpoint – 11/10/2025, 11/17/2025, 11/24/2025
9. (External) Bi-weekly BES CCB Meeting – 11/5/2025, 11/12/2025, 11/26/2025
10. (External) BES M&O Working Group – 11/5/2025, 11/12/2025
11. (External) Weekly BES Testing Workgroup Meeting – 11/6/2025, 11/20/2025
12. (External) BES Readiness/BI-29 Updates – 11/17/2025
13. eWorld/IV&V Mid-Month Check-in – 11/20/2025
14. (External) BES: OCM and Communications – 11/17/2025
15. (External) FTI Keywords Meeting – 11/7/2025
16. (External) BES Mass Change Planning Meeting – 11/10/2025

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 slight impact to 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

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

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

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

Appendix D – Background Information

Systems Modernization Project

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

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

Systems Modernization IV&V Project

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

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

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

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

Appendix D – Background Information

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

Ending Slide

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ID	Title	Reporter	Finding Type	Identified Date	Category	Observation	Significance	Recommendation	Event Horizon	Impact	Probability	Analyst Priority	Finding Status	Status Update	Client Comments	Vendor Comments
109	Medium - Lack of a current BES Maintenance & Operations (M&O) Schedule May impact the ability of DHS and the ASI to manage the M&O work effectively	Molina, Brad	Finding - Risk	10/28/2025	Project Management	The project team is executing without a current Maintenance & Operations (M&O) schedule that aligns with the planned pilot and statewide go-live implementation timelines. The aged M&O schedule does not reflect recent changes in milestones, resource assignments, or operational readiness activities necessary for a smooth transition to production. Additionally, DHS is unable to determine when resources are needed for DDI activities that may overlap with M&O tasks, which may lead to resource constraints. The ASI has stated multiple times that the schedule is being updated, per DHS' repeated requests over the last couple months. Additionally, ASI leadership of M&O has changed multiple times, which may also impact maintenance of the M&O schedule once reestablished.	Failure to execute to a current M&O schedule may result in: Inability for DHS and/or the ASI to effectively manage staff resources for both the DDI and M&O activities and tasks Inadequate planning and preparation of the operations teams for pilot and go-live support. Missed or delayed execution of critical readiness activities such as environment setup, training, UAT testing, and support planning. Increased probability of service disruptions, user dissatisfaction, and stakeholder impact during implementation.	Update the M&O schedule to reflect current project timelines, resource commitments, and operational readiness activities based on estimates developed by the staff that will perform that work. - Establish a formal operations teams for pilot and go-live support. Missed or delayed execution process for periodic review and validation of the M&O schedule with all relevant stakeholders. - Ensure the M&O schedule is integrated into the overall DDI project schedule and implementation readiness plans to show overlap of resource needs, tasks and activities - Maintain alignment between development, operations, and DDI project management teams by creating cross-functional meetings that include team members from each silo to ensure consistent, timely communication thereby aiding in the change management processes.	now	3	3	Med	Open	11/30/2025 - As of the end of the reporting period, a revised M&O schedule has not been provided to the project team. The ASI plans to finalize a revised DDI schedule in December, which will align with the updates being made to the M&O schedule. DHS has raised a M&O Schedule project risk which elaborates on the same concerns raised in this finding. Continued delays in clarifying the work/resources required by the ASI and DHS for M&O, may result in overallocation of staff resources for both the BES M&O and DDI activities, meaning planned work would not be completed as agreed upon in the schedule.		
108	Unplanned federally mandated system requirements could lead to project delays and increase the project budget.	Molina, Brad	Finding - Issue	9/5/2025	Requirements Analysis & Management	As part of the OBBBA, there are several new SNAP requirements of which some are awaiting FNS implementation guidance. Examples include: new conditions for work requirements, prior ABAWD waivers, new exemption classes, and standard utility deductions. The project is currently in the Systems Integration Test (SIT) phase, and the new requirements have yet to be fully defined, developed, and tested.	In 2024, DHS and the ASI agreed to transition from an "Agile" to a "Waterfall" software development life cycle to reduce the risk of future schedule delays. The Waterfall approach requires all requirements to move through the development as a single set of program code, processes, and procedures, ensuring that functionality is tested holistically. Once testing is complete, DHS can be confident that the base system is stable, performs as intended, and that functional interactions operate correctly. As the BES system is currently in the testing phase, introducing new requirements at this stage could create several challenges for the BES Pilot Release: Rework – Functionality previously tested may need to be retested as new code is introduced. Training materials, content, and operational processes may also require updates to reflect the changes; Schedule Delays – If new requirements are added, the project team may defer testing of existing functionality until the new functionality is developed and ready, potentially delaying the Pilot and Statewide Implementation start dates; Resources – Additional effort may be required to define, develop, and test new requirements. This could necessitate more ASI and DHS staff support, as well as technical adjustments (e.g., keeping development environments active longer than originally planned).	Open - Build in contingency in schedule to account for possible new requirements being introduced that must be part of the initial implementation of BES. - Pursue all communication channels that could provide early, and validated, information on possible requirements being sent out to the States.	now	3	2	Med	Open	11/30/2025 - The Food and Nutrition Services (FNS) organization is back to working with the government shutdown ending and clarification on the SNAP requirement changes continues to be an issue. Without clear guidance from FNS for the requirements needed to finalize the Change Requests (CRs) there may be additional schedule delays and increased project costs. 10/30/2025 - The Food and Nutrition Services (FNS) organization is now unable to provide some interpretations on the required policy mandates due to the government shutdown, but DHS/ASI are continuing to move forward with those changes that are fully defined. 09/30/2025 - As of the end of the reporting period, DHS was still awaiting clarifications from the Food and Nutrition Service (FNS) on required changes needed to meet Federal Eligibility mandates.		
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 Implement an escalation process to involve senior leadership if deadlines are missed. 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.	30 days prior to the IRS assessment or the next third-party assessment.	3	3	Med	Open	12/4/2025 – As of November 30th, 2025, BES had 11 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 1 critical finding was within the timeframe. BES had 27 high-rated findings in an open state outside the 30-day remediation timeframe, and 29 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 14 critical findings and 33 high findings from 2024 are listed as deferred, which are part of the Oracle Cloud Infrastructure that Oracle is responsible for patching quarterly. 11/5/2025 – As of October 31st, 2025, BES had 11 critical findings in an open or in-progress state outside the 15-day remediation timeframe, and 1 critical finding was within the timeframe. BES had 27 high-rated findings in an open state outside the 30-day remediation timeframe, and 29 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 14 critical findings and 33 high findings from 2024 are listed as deferred, which are part of the Oracle Cloud Infrastructure that Oracle is responsible for patching on a quarterly basis. 10/2/2025 – As of October 1st, 2025, BES had 10 critical findings in an open state outside the 15-day remediation timeframe, and 3 critical findings were within the timeframe. BES had 26 high-rated findings in an open state outside the 30-day remediation timeframe, and 18 high-rated findings were within the timeframe. In addition to the critical and high POAM findings listed above, 14 critical findings and 33 high findings from 2024 are listed as deferred, which are part of the Oracle Cloud Infrastructure that Oracle is responsible for patching on a quarterly basis. 8/28/2025 –As of August 27, 2025, BES had 28 critical findings in an open state outside the 15-day remediation timeframe, and 3 critical findings were within the timeframe. BES had 52 high-rated findings in an open state outside the 30-day remediation timeframe, and 42 high-rated findings were within the		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
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.	Morrill, Scott	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. • 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	11-30-25 -DHS and the ASI conducted three additional collaborative working sessions to continue reviewing contract requirements that remain untraced or unfulfilled. The objective is to ensure all project requirements are accurately mapped, supporting complete and reliable traceability within the JIRA tool used to generate the Requirements Traceability Matrix (RTM) deliverable. As of July 17, 2025, out of the 2,971 requirements for the project, a total of 741 unmapped requirements were identified that were not mapped properly. Of these unmapped requirements, 581 have been reconciled, with 160 that remain outstanding, and are currently being reviewed by DHS. The ASI planned to deliver an interim RTM on November 3, 2025. Due to the System Integrity Review Tool (SIRT) project revisions taking priority, the interim RTM delivery date for DHS was changed to November 26, 2025. Further delays will minimize the time DHS has to review and approve the RTM to ensure that all necessary BES functionality and supporting components have been developed and can be traced from the contract through development, testing and User Acceptance Testing with test cases linked to validate traceability. 10-31-25 - DHS and the ASI conducted five additional collaborative working sessions to continue reviewing contract requirements that remain untraced or unfulfilled. The objective is to ensure all project requirements are accurately mapped, supporting complete and reliable traceability within the JIRA tool used to generate the Requirements Traceability Matrix (RTM) deliverable. The ASI reported as of July 17, 2025, out of the 2,971 requirements for the project, a total of 741 unmapped requirements were identified that were not mapped properly. Of these unmapped requirements, 349 have been reconciled, with 392 that remain outstanding, primarily within the categories of Implementation, and Maintenance & Operations (M&O) requirements. The ASI planned to deliver an interim RTM on 11/3/25. The ASI reported that due		11/11/2025 eWorld recommended that our internal target date (11/3/25) not be referenced in the MSR. The project schedule indicates the work on this deliverable is expected to start on 11/24/25. 9/9/2024 Include information on interim version provided prior to FAT. 7/12/2024 I'm not sure if this is worth noting but eWorldES did deliver an "interim" BI-21
93	Due to the lack of physical and technical testing of the interfaces and data transfer failure, conditions may exist with data format, boundaries, and dependencies. These failures may result in intermittent and hard-to-isolate problems or errors	Frasca, Joe	Finding - Risk	4/29/2024	Integration and Interface Management	Aside from the functional testing accomplished during epic testing, specific data flow testing is usually part of an interface definition.	This testing is essential before initial deployment to prevent unexpected and difficult-to-resolve issues, such as scrambled or missing data – or the system may have a fault or exception. Since the Project has not established and tested the fault scenarios, we do not know how the system may react.	In Process * API interfaces should be tested for failure conditions during connection and transfer operations. * FTP and file interfaces should be tested for data and file integrity. * Test data fields for system impacts resulting from data that is poorly formatted, out of range, or other unexpected data transmission errors. Removed * [Not applicable—No transactional interfaces, therefore no race conditions] API interfaces do not require race condition testing. * [Redundant with other recommendations] Testing for format, length, and other physical formatting errors in interface records and files is covered under existing test cases.	2024 2nd Qtr	3	2	Low	Open	11/30/2025 - – Technical interface testing for file-based transfers continues, with approximately 52% of planned tests completed (111 of 211). There is a total of 25 shared and BES-specific interfaces. The ASI communicated that, due to ASI resource constraints, the remaining tests will not be completed by the original target date of December 12, 2025. Completion has been extended to align with the rescheduled end of System Integration Testing (SIT). IV&V notes that the revised timeline continues to limit opportunities for defect resolution and retesting before UAT. The project team should maintain focus on completing and retesting all remaining failure-condition scenarios to mitigate this finding's risk. 10/31/2025 - The ASI is executing physical and technical test scripts, with most tests passing. The ASI is planning to complete all Interface testing by the end of the overall SIT testing cycle. 9/30/2025 – The ASI reported that the interface test cases are established in Jira, but the board has not yet been made available to IV&V. The first interface test (CSEA/KEKI) was executed, marking an initial step forward. Timely IV&V access is needed to evaluate test coverage, effectiveness, and results. 8/31/2025 – Jira tickets are actively being created to define the specific tests required for each interface. As in the previous testing cycle, these tickets will outline test objectives and predefined scenarios rather than detailed, step-by-step scripts. Delays in initiating test execution are reducing the available time within the SIT window to complete testing, analyze defects, resolve issues, and conduct retesting. The late start further constrains efforts to address defects before UAT, increasing the risk that unresolved issues may impact downstream phases of the project. 7/30/2025 – The test script development has been assigned to a team. However, ASI attention to SIT defects has prevented significant progress. Testing is still intended to occur during System Integration Testing (SIT), which is currently underway. IVV reiterates that		06/14/2024 As mentioned at the May pre-meet, a technical Interface team plan does exist to address PCG's recommendations for this finding.5/11/2024 As mentioned at the pre-meet, a technical Interface team plan does exist to address PCG's recommendations for this finding.

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
83	Gaps in test coverage and slower-than-expected progress in testing may result in schedule delays if subsequent test phases uncover a higher volume of defects and user feedback than initially anticipated.	Ho, Justin	Finding - Issue	6/2/2023	Testing	After examining the Project's R11 QA Dashboards, R11 Traceability Dashboards, and Test Repository, gaps in testing coverage may exist and the progress of testing might be lagging. Concerning testing coverage, it appears that not all epics and use cases in R11 have associated test cases or are testing the correct use cases. In terms of progress, some test cases remain unexecuted, and not all defects have been resolved as the project commences System Integration Testing (SIT). The ASI has plans to complete the INT exit criteria by June 16, 2023, about 2 weeks after SIT begins.	Identifying defects early is vital for effective testing, as it is more efficient and cost-effective to address issues during the early testing stages. If there is slow progress or incomplete testing in the early stages, it can result in more defects leaking into subsequent testing phases, necessitating more extensive and rigorous testing efforts. Insufficient testing coverage or slower than-anticipated progress throughout the project lifecycle increases the risk of encountering significant delays, extensions, or the introduction of defects into the production environment during the final testing stage, known as Final Acceptance Testing (FAT).	OPEN - DHS and ASI revisit the testing approach to prioritize completion of remaining test activities and conduct comprehensive System Integration testing (SIT) to minimize defect leakage to User Acceptance Testing (UAT). - ASI test team provide a visual of progress of test case execution compared to current testing schedule CLOSED ASI assesses the potential impact of the large number of unresolved defects on future development efforts, ensuring a more robust and efficient development process - ASI develop and implement a revised testing approach to improve the completeness and thoroughness of future testing cycles. - The ASI should determine the root cause of the failure to identify simple defects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT (Closed 4/30/2024) - DHS and ASI monitor INT/SIT closely for both breadth and depth of testing to ensure the system is adequately tested (Closed 10/30/2024) - ASI utilize the two-week FAT testing pause to address and resolve outstanding SIT defects and apply the fixes in the FAT environment, ensuring that these defects do not recur when FAT resumes, optimizing testing efficiency and reducing potential defect rediscovery. (Closed 10/30/2024) NOT COMPLETED - The Project team reviews the SIT exit criteria and revises them as needed to ensure UAT/FAT begins with the best system possible. (3/31/2024) - DHS should request that the ASI develop a Corrective Action Plan to address the failure of prior test phases (Unit, INT) to capture defects that rolled into SIT (09/26/2024)	UAT	4	4	Med	Open	11/30/25 – The percentage of outstanding blocked SIT tests decreased from approximately 30% in October to 23% by the end of November. Remaining blocked tests are in key areas of Eligibility and the Self-Service Portal (SSP), which also contain the volume of unexecuted tests. End-to-end (E2E) testing progress remains a concern, with 46% of tests passing to date, highlighting ongoing challenges with system readiness, cross-module integration (Case Management, Application Management, Financial Management), and overall platform stability. Defects continue to be concentrated in problematic areas of SSP, Accessibility functionality, and Eligibility—these areas also include a number of the reopened defects. The ASI has reaffirmed its commitment to completing SIT by the targeted date of December 12, 2025. This does not include the ongoing change request work. 10/31/25 – Approximately 30% of the outstanding SIT tests are blocked in key areas of Eligibility and SSP, which also represent the highest areas of remaining unexecuted tests. Additionally, only a third of end-to-end (E2E) tests have passed, raising concerns about system readiness, integrations between the BES Modules (Case Management, Application Management, Financial Management), and stability. Defects continue to be concentrated in problematic areas of Reports and SSP, which also represent the top areas of reopened defects this month. 9/30/25 – The ASI plans to complete all SIT [scripted tests] by the end of October; however, approximately 80% of end-to-end (E2E) tests remain unexecuted. The timely execution of these remaining tests is essential for detecting integration issues, validating system stability, and reinforcing stakeholder confidence. Mid-month, the ASI added additional SIT tests related to the HANA Integration, bringing the total of unexecuted SIT tests (including E2E) to 240. The ASI has expressed confidence in completing all tests on schedule. Key integration areas with pending execution include HANA Integration, Eligibility, and Mass Change. IVV notes		9/12/2025 We questioned the inclusion of ADA in the list of highest volume of identified defects in our previous meeting. For SIT, we only have 55 ADA related defects identified so far out of which 35 defects are in Done status. Details can be made available if needed. We request ADA be removed from the list. 4/11/2025 Per eW Test Lead: What is needed to close the testing risk? Let's discuss at Mid-month. 3/13/2025 Our eWorld Test
80	Development delays have negatively impacted the project schedule and delayed go-live.	Frasca, Joe	Finding - Issue	6/30/2022	Configuration and Development	ASI had previously reported development activities have been slowed as they have been unable to achieve and/or maintain their expected development velocity. Previously, the development team was challenged with accurately estimating development task level of effort (i.e., story points) and the project has been challenged with producing a project schedule that accurately reflects realistic timelines (see Finding #74). The ASI continues to be challenged with finding qualified resources in a timely manner.	If the ASI is unable to achieve a velocity that enables them to meet planned milestones, schedule delays may lead to a delayed system go-live date. Failure to achieve a level of accuracy in estimating development tasks could lead to a project schedule that is flawed and unrealistic. Previously, DHS had indicated, and IVV agreed, that some of these delays were due to some ASI BAs lacking the expertise required to create optimal designs and system specifications that developers could consume without requiring extensive clarification from the ASI BA/SA team. DHS and IVV observed instances where ASI BAs/SAs have presented less than optimal designs and left it to DHS (who may lack software or UI design expertise) to improve, which has contributed to unproductive design sessions (see Finding #61). It remains unclear if scope creep has contributed to these delays.	OPEN • ASI provides DHS with the time needed to effectively evaluate the software demonstrations (demos) and elicit productive design discussions with DHS attendees during each demo. • The project closely monitor progress on development efforts and create a mitigation strategy to avoid delays. COMPLETE CLOSED • ASI regularly report metrics that accurately track the total amount of remaining work to reach go-live and present a dynamic burndown chart to clearly display progress to stakeholders. (closed 3/31/2025) • ASI effectively track and regularly provide DHS (potentially via the weekly DDI status meeting) with an accurate velocity (e.g., story points per day/week/month) and assure that the current velocity is accurately and consistently reflected in the project schedule (closed 2/28/2025) • DHS request the ASI strategically add the right project team resources to effectively increase velocity. Note that adding additional junior resources may not be as effective as staffing additional expert-level development, analysis, and other resources that can lead and mentor junior resources. • ASI reviews the development process and identifies and mitigates the challenges preventing them from incorporating Epic demo activities into the project schedule. (9/29/23 - ASI will not be doing this, with DHS approval) • ASI consider taking steps to increase code quality, including enhancing the depth of developer unit testing, tracking and proactively preventing leakage, and enforcing effective coding standards and good governance. • The ASI should consider enhancing the depth of developer unit testing.	Immediate	3	3	Med	Open	11/30/2025 - The ASI has reported SIT defects, which include the areas of Batch processing, Reports, Correspondence, and Data Conversion. IV&V is analyzing these defects to understand any relationship to the development team's performance or if other factors are causing these issues. A root cause analysis of the defects by the ASI, which includes DHS and IV&V, would be useful. Additional change requests requiring development, primarily to meet federal mandates (HR1), are resulting in schedule adjustments. Once the new schedule is released, IVV will evaluate the ASI estimates and the level of detail provided to complete this development work. 10/30/2025 - It remains unclear if any development issues may delay the project, however additional work for change request (CR) 2025-040 ABAWD and SNAP Work Requirements updates will not be completed until 1/26/2026, which is after the planned start for User Acceptance Testing (UAT). To avoid phasing-in this functionality after UAT has started, the ASI and DHS have agreed to delay the start of UAT - which will push out go-live for Pilot and statewide implementation. 9/30/2025 - The ASI has indicated its intent to leverage AI-based tools to support unit testing, which may increase developer productivity. However, IV&V remains concerned that the planned introduction of additional functionality during UAT could add complexity to the development lifecycle and hinder overall productivity. 8/31/2025 -The ASI is reporting System Integration Testing (SIT) is progressing as planned. IVV continues to monitor for potential development delays and/or code quality issues that may impact the effectiveness and timely completion of the SIT phase. The project team indicated they plan to introduce new functionality during UAT which may slow defect repairs, rework and add additional complexity for developers to manage resulting in the least impact to the project and project team. 7/30/2025 - The ASI appears to be making good progress with System Integration Testing (SIT). It		10/11/2025 Please elaborate - what additional functionality during UAT is being referenced here? 7/15/2025 Per our Development Lead: "We had cleared the entire backlog before SIT. We had 50+ defects pending[med/lows] when we started SIT and all those defects were raised post 6/1/2025. everything old was completed." 5/13/2025 We don't believe this issue "Development delays.." is still an issue and is a carry-
73	The planned BES infrastructure is complex which could be difficult to implement and lead to schedule/cost impacts.	Frasca, Joe	Finding - Risk	10/28/2021	System Design	Current ASI infrastructure plans include a significant number of sophisticated components that make up a complex cloud infrastructure. Further, the Project Team has yet to finalize components that will make up the BES infrastructure and the additional costs and time to configure, test, and implement the planned complex environment remain unclear.	If the level of effort to implement and manage the complexities of the BES infrastructure is not accurately accounted for and staffed by the ASI, the project could be met with unexpected costs and schedule delays. Delays in finalizing the components being implemented could exacerbate this risks and lead to further delays. Complex platforms often present system maintenance and operations challenges as system changes can hold the increased potential for system failure (i.e., due to the significant number of "moving parts") and increase the level of time and effort to resolve infrastructure and application-level bugs. Further, some components remain in an immature state compared to their legacy counterparts. For example, the project recently experienced a system failure because Google Cloud failed to clearly communicate a change that led to failure in another component (i.e., Nexus). Google Cloud is generally viewed as a less mature product offering, compared to their rivals (Amazon Web Services, Microsoft Azure). IV&V remains concerned that this could lead to failures at critical points in the project (including post-go live production failures) that could be difficult to resolve and lead to project disruption. If DHS intends to eventually reduce M&O outsourcing costs turning over M&O tasks to State employees, they could face challenges supporting tools they may not be familiar with in a complex infrastructure environment.	• ASI develop a process to closely monitor cloud and other product changes (software updates/new releases), manage changes, and regression test once changes/updates are applied. • The project team work to establish strong governance over the utilization and maintenance of the various system tools/components. • ASI allot time in the schedule to conduct proof of concepts to assure infrastructure components work as expected. • ASI maintain a detailed schedule for infrastructure tasks to avoid unexpected delays that could delay project milestones and the critical path.	Next several months	2	2	Low	Open	11/30/2025 - The ASI has rolled back the Bindplane software updates that created issues with the LINUX servers. With the former NXLog tool used to monitor the servers back in use, the ASI has time to work on a resolution. 10/31/2025 - Some defects reported during SIT have root causes in the stability of the BES infrastructure. The ASI states that the issues with shared resources and Bindplane software that occur in testing environments should not be present in production. However, IVV has not yet been provided with artifacts or project documentation to validate that these issues will not materialize in UAT or Production environments. 9/30/2025 - Work appears to be progressing on the full build out of the Secure Enclave. IV&V remains concerned that this build out adds additional complexity to the infrastructure environment which could further exacerbate this risk. 8/31/2025 -The ASI indicated that communication between the DHS shared platform team and the BES project has improved, reducing the likelihood of unforeseen or unexpected issues arising from the shared platform moving forward. The project elected to add a new AI tool to its suite of tools to assist users with online help and user guides. During recent Maintenance and Operations (M&O) planning sessions, the project team identified areas such as Security and Incident Management where BES infrastructure operational processes may differ from those used in the legacy systems. How this added complexity will impact implementation schedules and the scope of M&O planning and support, is not yet known. 7/30/2025 - The project appears to be making efforts to improve communications between the shared platform team and the BES project. IVV remains concerned that changes to the DHS shared services platform could negatively impact the project schedule and budget. 6/30/2025 - IVV remains concerned that changes to the DHS shared services platform could negatively impact the BES project schedule. Governance over the platform has yet to be		2/13/2025 Perhaps for the next MSR we should review the outstanding recommendations to ensure progress status is reflected accurately. 11/17/2023 - Again, why is DR being referenced here? Per the current project schedule, the DR plan is scheduled to be submitted at the end of the year. Reminder: Pilot Go-Live is April 2024. 10/31/2023 - Vic - westill do notunderstand why this remains. 10/11/2023
70	Insufficient configuration management could lead to development confusion and reduce the effectiveness of defect resolution	Molina, Brad	Finding - Risk	8/23/2021	Configuration and Development	The BI-6 DDI Plan Deliverable, Section 5.2 establishes the framework for the Configuration Management Plan, however, it remains unclear if sufficient progress has been made toward establishing CM processes and governance, selecting CM tools (e.g., CMDB), and building out the CM infrastructure. The projects Security Plan has yet to be finalized which may include additional requirements or decisions that could impact CM. The project currently relies on Github for tracking of some configurations.	Configuration Management is a set of processes and procedures that ensures the BES is understood and works correctly. The BES solution includes tools that may provide a level of automation for Configuration Management that may reduce errors and should provide the project team with accurate, dynamic and timely information on some of the configuration items. However, it is critical that DHS/ASI agree to the full list of items that are included in the configuration plan along with the details regarding the management of the configuration items, reporting and audit features.	OPEN • 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. • ASI validate plans for configuration management with DHS and agree on a meaningful set of configuration items or settings they will track. COMPLETED • DHS and ASI work to clarify/solidify plans for the potential use of configuration management tools. • Identify the DHS POC for the Configuration Management Activities that would provide oversight of configuration management activities and assure defined CM steps and plans are being followed, are effective, and are achieving DHS objectives for CM. 7/31/2022	ASAP	2	2	Low	Open	11/30/2025 - The ASI has communicated: Progress is being made on completing a configuration management plan since February 2025. Configuration management was implemented in July 2025 However, a document that clearly states how configuration management has been implemented and how it will be managed has not been provided. DHS requires this plan to enable DHS and the ASI to agree on the full list of items that are included and their management, in preparation for the Pilot implementation, Statewide Rollout, and follow-on Production Support activities. 10/30/2025 Additional information was requested from the ASI regarding progress in defining and implementing configuration management for BES, but as of the end of the reporting period no additional status information was provided. 9/30/2025 - No material update. 8/31/2025 - No material update. 7/30/2025 - No material update. 6/30/2025 - The ASI continues to make progress in building out its Configuration Management, including leveraging ServiceNow to automate some processes to streamline deployments. However, it remains unclear if the configuration management database will be robust enough to offer developers clear root cause traceability to correlate bugs to system or infrastructure configuration changes. This could hinder defect tracing and delay repair efforts and lead to project delays. 5/31/2025 - No material update. 4/30/2025 -IVV continues to await receipt of the Configuration Management Plan from the ASI. 3/31/2025 - The ASI has reported progress in updating the project Configuration Management Plan (CMP). 2/28/2025 - The ASI has reported progress in constructing their configuration management database within ServiceNow, having recently imported multiple configuration items (CIs). 1/31/2025 - No material update. 12/31/2024 - No material update. 11/30/2024 - This finding will be reevaluated by the IVV team after the project team completes the re-planning and determines the approach,		7/10/2025 It does not appear our feedback was addressed. We mentioned at our last meeting that configuration management is in place, and we are currently working on leveraging ServiceNow to automate the related processes. So, the statement that configuration management is not in place prior to SIT is not accurate. 5/6/2025 Work hand in hand with M&O and CMDB work. Good progress