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

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

April 16, 2025

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, 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 Hawai'i, Department of Human Services, Systems Modernization Project.

In accordance with HRS section 93-16, this report may be viewed electronically at <u>http://ets.hawaii.gov</u> (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: March 1 – 31, 2025

Submitted: April 15, 2025



Solutions that Matter

Overview

- Executive Summary
- IV&V Findings and Recommendations
- <u>IV&V Engagement Status</u>
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Solutions that Matter

Executive Summary



Executive Summary



March 2025 was the second month of the most recent BES Project Restart. IV&V notes improvement in the Project Management and Security and Privacy categories. Within Project Management, the project team executed the planned schedule (with a few adjustments), and evidence shows the ASI and DHS teams focused on the security and privacy work by remediating critical and high-rated findings. The project team also completed all Joint Application Design (JAD) sessions for the remaining functionality planned for the BES Pilot.

Challenging areas include:

- Development: The current schedule for the Customer Correspondence development work is planned to be completed one week before the start of System Integration Testing (SIT); this does not leave much time for the project team to resolve anomalies.
- Testing: Progress in resolving defects carried over from the last User Acceptance Testing (UAT) cycle has slowed due to blockers delaying completion. IV&V is concerned that the completion of all UAT defects before SIT may be at risk, which may cause DHS rework and schedule delays.
- Security: The ASI made good progress in March, completing the IV&V recommendation for rating security scans and making positive progress in remediating critical and high-rated findings. IV&V is concerned that some newly written policies might not be approved by DHS in time for the IRS submission planned for late April 2025, which could impact receiving IRS concurrence to move forward.
- Requirements Analysis and Management: The ASI continues to struggle with creating a standard Requirements Traceability Matrix report that provides validation to DHS and Federal oversight agencies that all contractual requirements have been fulfilled in the BES solution.
- DHS and the ASI are well aware of the above concerns, and in addition to monitoring each of them, they are also working on mitigation plans should they be needed.

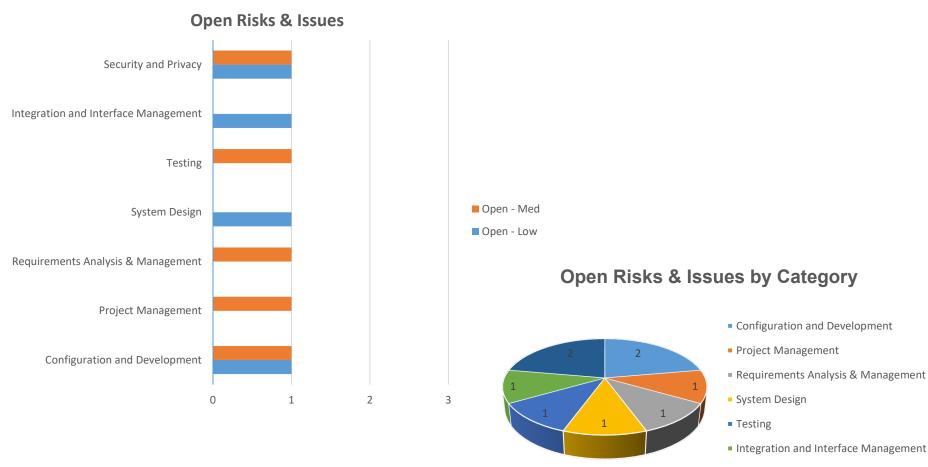
Jan	Feb	Mar	Category	IV&V Observations
Н	н	M	Project Management	The project schedule has remained stable with minor changes, leading IV&V to lower the criticality rating for this category (and related finding) to Medium. However, the development phase, scheduled to finish just one week before System Integration Testing (SIT), will be closely monitored as a-potential risk to the project schedule.

Executive Summary

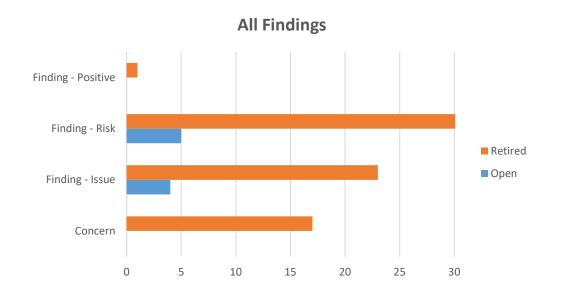


Jan	Feb	Mar	Category	IV&V Observations
L	L	L	System Design	This month, the final Joint Application Design sessions planned for BES were completed, along with the DHS validation of the related functional design updates.
M	M	M	Configuration and Development	The ASI continues to make progress updating the Configuration Management Plan (CMP) and completed all JAD sessions for the remaining Pilot scope of work. However, IV&V is concerned about potential delays in the customer correspondence functionality and recommends close monitoring and a mitigation strategy. The ASI has stated they are planning to add more resources to support this effort in the near term.
	L	L	Integration and Interface Management	The ASI is currently preparing test scripts to comprehensively test all interfaces during the SIT and UAT phases before the Pilot. This process involves conducting regression testing and retesting previously validated scripts to ensure compatibility with newly developed code that supports all requirements.
M	M	М	Testing	IV&V is concerned about the slow pace of defect resolution for last year's UAT, only 3 high- priority, 1 medium-priority, and 3 low-priority defects were resolved during the month. All UAT defects must be resolved for SIT to start.
M	M	M	Security and Privacy	The security infrastructure toolset is being evaluated and updated while the project team continues to work on the security policies, which must be fully approved prior to the next IRS Security Review at the end of April 2025. Unapproved policies may result in IRS corrective action plans.
M	M	M	Requirements Analysis & Management	The ASI continues to work on developing an RTM that will provide DHS the traceability of each contract requirement (Functional, Technical and other) through testing and vice-versa.

As of the March 2025 reporting period, PCG is tracking 9 open findings (5 risks, 4 issues) and has retired 81 findings. Of the 9 open findings, 5 are Medium, and 4 are Low.



The following figure provides a breakdown of the 90 IV&V findings (positive, risks, issues, concerns) by status (open, retired).





Findings Opened During the Reporting Period

#	Finding	Category
	None	



Findings Retired During the Reporting Period

#	Finding	Category
	None	



Preliminary Concerns Investigated and Retired During the Reporting Period

#	Finding	Category
	None	

Project Management

#	Key Findings	Criticality Rating
	Issue – A BES Project schedule based on inaccurate estimations diminishes effective planning and resource management, which could result in late deliverables, cost increases, and a late go-live.	
74	The BES project schedule was relatively stable this month (minor changes were made), with a few tasks delayed while others were completed earlier than planned. IV&V is updating the criticality rating from High to Medium. However, we continue to monitor the minimal slack time between the completion of development and the beginning of System Integration Testing.	M
Reco	ommendations	Progress

	FIUGLESS
 Monitor, evaluate and revise scheduling estimates for accuracy based on the project teams past performance and resources available to do the remaining work. 	Completed
 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for DHS. 	In Process
 Elaborate the schedule to include the detailed work and tasks required behind milestones, allowing better tracking and visibility of possible issues and delays at the task level. 	Completed
 ASI develop a mitigation plan for minimal amount of slack time between development completion and start of SIT. 	New



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. No material update in the reporting period.	

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 DevOps implementation tasks to avoid unexpected delays that could dela project milestones and the critical path. 	ay In Process



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 reported progress in updating the project Configuration Management Plan (CMP).		

Recommendations	
 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



In Process

Closed

New

Configuration and Development

productive design discussions with DHS attendees during each demo.

dynamic burn-down chart to track the progress.

mitigation strategy to avoid delays.

•

#	Key Findings	Criticality Rating
80	Issue – Development delays have negatively impacted the project schedule and delayed go-live. The ASI completed the JAD sessions for the BES Pilot. The Change Request (CR) for customer correspondence functionality was identified as requiring substantial effort and is scheduled for completion by the end of the development phase. IV&V continues to express concern that, based on past performance, any disruptions affecting correspondence may leave the project with minimal time to respond without extending the pilot go-live date.	M
Recommendations		
• A	ASI provides DHS with the time needed to effectively evaluate the software demonstrations (demos) and elicit	In Drococc

ASI regularly reports estimated story points for the total remaining project work to reach go-live and presents a

IV&V recommends the project closely monitor progress on the customer correspondence CR and create a

HI Systems Modernization Independent Verification & Validation Monthly Report: March 2025



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. The technical testing subtests have begun to be written. Each interface will have a script to test failure conditions such as malformed fields and files.	L

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

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 of March 26th, the ASI is addressing previous testing cycle defects, with 154 defects (37 high, 83 medium, 34 low) in "Ready for UAT" (fix complete, not deployed to UAT environment) status and 26 defects (15 high, 3 medium, 8 low) "In UAT" (fix deployed to UAT environment) status.	
	A comparison with last month's progress reveals the ASI closed 3 high-priority, 1 medium-priority, and 3 low-priority defects. Unless the ASI's performance increases, this may result in a situation where the defects are not resolved prior to the start of the next testing cycle, continuing this risk to the project. IV&V is concerned the pace of defect resolution may delay the next testing cycle and impact the project's go-live date. IV&V emphasizes the need for immediate attention to accelerate defect resolution to avoid project delays.	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 Progress
 ASI assesses the potential impact of the large number of unresolved defects on future development efforts, ensuring a more robust and efficient development process. 	In Progress
 ASI develop and implement a revised testing approach to improve the completeness and thoroughness of future testing cycles. 	In Progress



Security and Privacy

#	Key Findings	Criticality Rating
	Issue – The lack of technical documentation may lead to incorrect implementation statements or delay the System Security Plan (SSP).	
82	Last month, IV&V reported that the ASI has dropped MongoDB from the Secure Enclave after evaluating IRS Publication 1075-compliant alternatives and is converting to Google Firestore. However, the ASI has also replaced IBM Filenet in the Secure Enclave with Google Firestore. The ASI and DHS have continued working on the NIST 800-53R5 Security Policies. In addition to the 6 policies the ASI had submitted to DHS and received feedback 14 other policies were updated based on the feedback and are currently waiting internal review prior to submission to DHS. DHS has a Safeguard Security Report (SSR) due to the IRS at the end of April. The policies that are being written for the BES System need to be reviewed and approved by DHS and the process for system level policies is being worked on by DHS. However, IV&V is concerned that the newly written policies will not be approved prior to the IRS SSR submission.	L

Recommendations		
•	Collaborate and communicate with SSP authors about when reliable and correct documentation will be available.	In Process
•	Include the Secure Enclave within the work breakdown structure along with the known tasks related to the IRS Assessment to continue receiving FTI in BES.	In Process



Security and Privacy

#	Key Findings	Criticality Rating
	Risk – Critical and high vulnerability and configuration scan findings are not remediated within the documented timeframes, potentially impacting the project schedule and causing delays.	
106	The ASI completed the IV&V recommendation to rate the criticality of configuration scans and made progress on remediating findings that are rated critical and high. At the time of this writing, BES had 20 critical findings open or in progress outside the 15-day remediation timeframe, and one critical finding was within the timeframe. BES had 22 high-rated findings open or in progress outside the 30-day remediation timeframe, and five high-rated findings were within the timeframe. It should be noted that remediation on some single POAM items in the list may require patching or configuration changes on multiple hosts (from development environments to production environments) and are listed as in progress while these changes are being applied across multiple hosts.	M

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



Requirements Analysis & Management

#	Key Findings	Criticality Rating
	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.	
94	The ASI hosted a Requirements Traceability Matrix (RTM) report walkthrough meeting on 3/21/25 with DHS and IV&V to provide updates on the creation of their report. This report was for functional requirements only. ASI stated they would work on producing an RTM that will provide DHS the traceability of each contract requirement (Functional, Technical and other) through testing and vice-versa.	M

Recommendations		
•	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 has been fully 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.	Not Started
•	Provide weekly updates about the clean-up efforts in JIRA regarding incorrect statuses of epics, use case, and requirements.	New

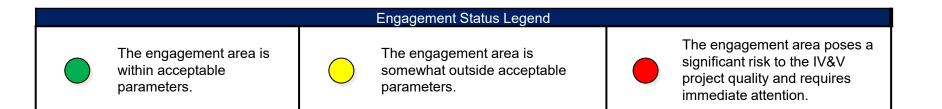




IV&V Status

IV&V Engagement Status

IV&V Engagement Area	Dec	Jan	Feb	Comments
IV&V Budget				
IV&V Schedule				
IV&V Deliverables				PCG submitted the final February IV&V Monthly Status Report.
IV&V Staffing				
IV&V Scope				



IV&V Activities



- IV&V activities in the March reporting period:
 - Completed February Monthly Status Report
 - Ongoing Review the BES Project Artifacts and Deliverables
 - Ongoing Attend BES Project meetings, (see <u>Additional Inputs</u> pages for details)
 - Ongoing Review available ASI contracts and contract amendment documentation
- Planned IV&V activities for the April 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	3/13/2025 3/26/2025	N/A
CR2024-009 HAWI Notices Conversion	3/13/2025	V0.1
BI-02 Project Status Report	3/5/2025, 3/12/2025, 3/19/2025, 3/26/2025	NA

Additional Inputs – Artifacts



Artifact Name	Artifact Date	Version
BES 2023 Design Kanban board	N/A	N/A
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
SNAP_System_Integrity_Review_Tool	Sept 2022	N/A
Interface Dashboard – Confluence page	N/A	N/A
BES 2023 Implementation Planning – Confluence page	N/A	N/A
R0.12 Epic Assignment	N/A	N/A
R0.12 Epic and Sprint Demo Recordings	N/A	N/A
ADA dashboard	N/A	N/A
Jira Requirements Details	N/A	N/A
Jira Testing Lists	N/A	N/A
UAT Testing Dashboard	N/A	N/A
Waterfall Methodology Plan	N/A	N/A

Additional Inputs



Meetings and/or Sessions Attended/Observed:

- 1. IV&V Team Meeting 3/3/3025, 3/5/2025, 3/10/2025, 3/12/2025, 3/24/2025, 3/26/2025, 3/31/2025
- 2. IV&V/ASI January Pre-draft Review 3/5/2025
- 3. HI DHS BES February Draft IV&V Report Review 3/13/2025
- 4. Bi-Weekly DHS BES PMO/IV&V Check-in 3/13/2025
- 5. Bi-Weekly DHS and IV&V Touch Base 3/4/2025, 3/19/2025
- 6. Weekly BES Infrastructure meeting 3/7/2025, 3/14/2025, 3/21/2025
- 7. Weekly Client BES 2023 Project Status Meeting 3/12/2025
- 8. Security Touchpoint 3/5/2025, 3/12/2025, 3/19/2025
- 9. (Externa(I) Weekly Interfaces Touchpoint 3/3/2025, 3/10/2025, 3/24/2025, 3/31/2025
- 10. (External) Bi-weekly BES CCB Meeting 3/5/2025, 3/19/2025
- 11. (eWorld/IV&V Mid-Month Check-in 3/20/2025
- 12. (External) BES: FNS Connect 3/6/2025
- 13. (External) Day 2 Final Approval for CR2024-017 BES 1.0 Correspondence Enhancements 3/3/2025
- 14. (External) CR2024-019, 024, & 025 FD Comment Review Meeting 3/5/2025
- 15. (External) Testing Related Follow-up meeting 3/13/2025
- 16. (External) CR2025-028 HYCF/DPS Interfaces AND CR2025-029 DOH Update frequency to quarterly for DOM and DOB request/response 3/14/2025
- 17. (External) JAD CR2024-013 DHS Application Packet Multiple Correspondences 3/19/2025
- 18. (External) BES RTM Report Walkthrough Meeting 3/21/2025, 3/27/2025
- 19. OPA Discussion and Walkthrough 3/28/2025
- 20. (External) BI-17 Deliverable Comments Review Meeting 3/31/2025







Appendix A – IV&V Criticality Ratings

Criticality Rating	Definition
Н	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
СММІ	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



Solutions that Matter

HI DHS Monthly IV Status Report Final - March 2025

		Finding	Identified					An	alyst Finding			
ID Title	Reporter	Туре	Date Category	Observation The BES system does not currently remediate critical vulnerabilities and	Significance	Recommendation	Event Horizon Impa 30 days prior to	act Probability Pri	ority Status	Status Update 03/31/2025 – The ASI completed the IVV recommendation to rate the	Client Comments	Vendor Comments
106 Critical and high vulnerability and configuration scan findings are not remediated within the documented timeframes.	Heath, Dustin Fi	inding - isk	2/28/2025 Security and Privacy	compliance issues within 15 days, and high vulnerabilities are not remediated within 30 days as required by the BES Vulnerability Management		Update the BES Vulnerability Management Procedures document with the Jira ticketing process and workflow from vulnerability and configuration	the IRS assessment or the next third-	3 3 Me	ed Open	GU1212025 - The AB complete the MV recommendation is rate the comparison of the second secon		
						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 result. In January 2025, Excitical and High finding POMs were listed due to the Tenable configuration scan results. The POMs for configuration scans are now listed as "faile"; due to the bismary nature of the scan engine and does not rate the criticality of the system configuration and has bismare continued.				Isted as in progress while these changes are being applied across multiple hosts.		
94 The lack of an effective way to validate BES requirements could lead to project delays	S Morrill, Scott Fi		4/25/2024 Requirements Analysis &		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	IN PROGRESS • Develop a document that provides DHS with a feasible and effective way to	45422	3 3 Me	d Open	3/26/25 - The ASI hosted a Requirements Traceability Matrix (RTM) report walkthrough meeting on 3/21/25 with DHS and IVV to provide updates on		9/9/2024
and unfulfilled user needs if DHS later identifies unmet contractual requirements.	i.		Management	associating each requirement with passed test case(s). However, the approved project schedule shows the RTM completed on 6/26/24, which fails after the Core STT 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	criteria.	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".				the creation of their report. This report was for functional requirements only. ASI stated they would work on producing an RTM that will provide DHS the traceability of each contract requirement (Functional, Technical and other) through testing and vice-versa.	s	Include information on interim version provided prior to FAT.
				the deliverable due to DHS concerns. This BI-22a deliverable may help DHS validate requirements.		 Ensure test scripts thoroughly and comprehensively test the system to assure each requirement has been fully met. 				2/26/2025 - The ASI continues to work on delivering an RTM that DHS can use. The key outstanding items from the Mid-Month project team meeting		7/12/2024
						 Develop a deliverable that provides an audit trail for changes to the requirements from the contract such as obsoleted requirements, when that 				on 2/20/25 between ASI and IVV include Use Cases and Requirements in Jira need to be updated as they have the		I'm not sure if this is worth noting but
						decision was made, and the change requests.				Incorrect status. There are Use Cases in Jira which have been obsoleted but still have active		eWorldES did deliver an "Interim" BI-21
						 Brovide weekly updates about the clean-up efforts in JIRA regarding incorrect statuses of epics, use case, and requirements. 				requirements that need to be updated. There are Epics in Jira which are completed but need to be updated to the		RTM to satisfy the requirement criteria
										correct status. The AGI stated fixing these key outstanding items will them to produce a comprehensive and usable RTM. 1/31/2025. the AGI shared their 1/31/2025.		for entering into BES 1.0 FAT.
										1/31/2025 - At the CLB meeting on 1/21/2025, the Asi shared their progress on addressing issues with the functional requirements in Jira. This effort is a pre-requisite to providing a comprehensive and accurate set of		06/14/2024
										enores a pre-requiring a comprehensive and accurate set of Requirements Traceability Matrix (RTM) reports. The ASI plans to review the current RTM reports at the next CCB meeting on 2/5/2025, which may	e	The BI-21 RTM deliverable has been
										provide DHS with clarity on requirements coverage per the current BES contract		reviewed and discussed multiple
										12/31/2024 - The ASI hosted a meeting to review usage of the RTM, but all		times at the bi-weekly CCB meeting. Draft
93 Due to the lack of physical and technical	Reynolds, Fi	inding -	4/29/2024 Integration and	Aside from the functional testing accomplished during epic testing, specific	This testing is essential before initial deployment to prevent unexpected and	In Process	2024 2nd Qtr	3 2 Lov	w Open	attendees agreed more work was needed to provide a usable report for both 3/31/2025 - The technical testing subtests have begun to be written. Each	h	reports of the BI-21
testing of the interfaces and data transfer failure, conditions may exist with data format, boundaries, and dependencies.		lsk	Interface Management	data flow testing is usually part of an interface definition.	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.	* API interfaces should be tested for failure conditions during connection				interface will have a script to test failure conditions such as malformed fields and files.		06/14/2024 As mentioned at the
These failures may result in intermittent an hard-to-isolate problems or errors	nd					* FTP and file interfaces should be tested for data and file integrity.				2/26/2025—The remaining interface test scripts are being prepared to ensure comprehensive testing of all interfaces, including the retesting of		May pre-meet, a technical Interface
						* Test data fields for system impacts resulting from data that is poorly formatted, out of range, or other unexpected data transmission errors.				previously performed tests to validate accuracy and maintain up-to-date results.		team plan does exist to address PCG's recommendations for
						Removed * (Not applicable—No transactional interfaces, therefore no race				1/30/2025—Interface technical testing will occur during SIT and UAT, depending on the interface partner's resource availability. Interfaces		this finding.5/11/2024
						 (Not applicable—No transactional interraces, therefore no race conditions) API interfaces do not require race condition testing. 				requiring technical testing during this project phase are EDRS, HYCF, DOH, DPS, PARIS, BEER, IRS, IVR, HANA, DoTax, FNS, ACF, ECF, and EDM. IVV will continue to monitor them.		As mentioned at the pre-meet, a technical
						 (Redundant with other recommendations) Testing for format, length, and other physical formatting errors in interface 				12/31/2024—The initial set of testing was successful. Test planning and		Interface team plan does exist to address
						records and files is covered under existing test cases.				execution for the other interfaces should be integrated into the recast schedule discussions. Successful results, including graceful rejection of invalid interface data (such as misnamed SFTP files or short fields/truncated files), are recommended prior to commencement of ST testing.	1	PCG's recommendations for this finding.
										10/31/2024—This finding will be reevaluated by the IVV team after the project team completes the replanning and determines the approach, requirements/functionality, and schedule for the Pilot and Statewide rollout	L	
										09/30/2024—The 7 interfaces used in the planned Pilot release, BES1.0, have been completed. However, the other 12 releases required for the statewide release. BES1.1. will be required with the revised approach to		
83 Gaps in test coverage and slower-than- expected progress in testing may result in schedule delays if subsequent test phases	Kalsi, Neetu Fi Is	inding - isue	6/2/2023 Testing		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	- DHS and ASI revisit the testing approach to prioritize completion of	UAT	4 4 Me	ed Open	3/26/2025- As of March 26th, the ASI is addressing previous testing cycle defects, with 154 defects (37 high, 83 medium, 34 low) in "Ready for UAT" (fix complete, not deployed to UAT environment) status and 26 defects (15		
uncover a higher volume of defects and use feedback than initially anticipated.	ter			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	more defects leaking into subsequent testing phases, necessitating more extensive and rigorous testing efforts. Insufficient testing coverage or slowe	testing (SIT) to minimize defect leakage to User Acceptance Testing (UAT). r - ASI assesses the potential impact of the large number of unresolved				high, 3 medium, 8 low) "In UAT" (fix deployed to UAT environment) status. A comparison with last month's progress reveals the ASI closed 3 high-		3/13/2025
				unexecuted, and not all defects have been resolved as the project commences System Integration Testing (SIT). The ASI has plans to complete	than-anticipated progress throughout the project lifecycle increases the risk of encountering significant delays, extensions, or the introduction of defects	defects on future development efforts, ensuring a more robust and efficient development process	:			priority, 1 medium-priority, and 3 low-priority defects. Unless the ASI's performance increases, this may result in a situation where the defects are		Our eWorld Test Lead is inquiring what
				the INT exit criteria by June 16, 2023, about 2 weeks after SIT begins.	into the production environment during the final testing stage, known as Final Acceptance Testing (FAT).	 ASI develop and implement a revised testing approach to improve the completeness and thoroughness of future testing cycles. 				not resolved prior to the start of the next testing cycle, continuing this risk to the project. Jv&V is concerned the pace of defect resolution may the start of the sta		is needed to close this issue?
						CLOSED				delay the next testing cycle and impact the project's go-live date. IVV emphasizes the need for immediate attention to accelerate defect resolution to excide an each defect.	n	2/13/2025 Per Hemant (eW Test
						CLOSED - The ASI should determine the root cause of the failure to identify simple defects in INT and SIT and implement effective improvement processes to				to avoid project delays. Additionally, IVV conducted a sampling of the defects currently in "Ready for UNT" characterize to reader comments and conservation in lice. Breliming any	ır.	Hemant (eW Test Lead): " there is no change in the
						detects in INT and SIT and implement effective improvement processes to confirm early testing is adequate before entering UAT/FAT (closed 4/30/2024)				UAT [®] status by reviewing comments and screenshots in Jira. Preliminary findings indicate that the defect's resolution appears satisfactory. However, to ensure thoroughness. IVV will verify with ASI that repression testing has		change in the testing process for R0.13 as far as
						- 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)				been completed to catch any potential defects that may have arisen during the test case completion. This additional step aims to provide confidence		waterfall methodology is concerned." We
						 ASI utilize the two-week FAT testing pause to address and resolve outstanding SIT defects and apply the fixes in the FAT environment, ensuring 				the test case compression. This additional step alms to provide completion that the system is stable, reliable, and ready for client for UAT.		are notplanning to have any phased in
						that these defects to not recur when FAT resumes, optimizing testing efficiency and reducing potential defect rediscovery. (Closed 10/30/2024)	,			2/26/2025 -As of the February 26th status report, the vendor is actively resolving UAT defects. Currently, 147 defects (34 high, 82 medium, 31 low)		functionalities with R0.13.
						NOT COMPLETED				are ready for UAT testing, while 63 defects are in progress. Looking ahead, System Integration testing (SIT) is scheduled to commence in mid-June. Any		12/11/2024
						 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) 				development delays may delay testing and potentially push back the go-live date, impacting the project schedule.		Please revisit the first two recommendations
						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						as these should reflect an "In Process"

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e lack of technical documentation may Heath, Dustin Finding -			Significance	Recommendation	Event Horizon Impac	t Probability Priority	Status	Status Update	Client Comments	Vendo
	4/27/2023 Security and	In April, the ASI/DHS system security plan (SSP) authors began writing		In Progress	Prior to the start of	2 2 Low	Open	3/31/2025— Last month, IVV reported that the ASI has dropped MongoDB		
id to incorrect implementation statements Issue delay the System Security Plan	Privacy	implementation statements. Currently, the technical documentation	authors may need to edit or rewrite implementation statements. A full draft of the SSP is scheduled to be published August 15th , 2023, and the final SSP	 Collaborate and communicate with SSP authors about when reliable and 	the third-party			from the Secure Enclave after evaluating IRS Publication 1075-compliant alternatives and is converting to Google Firestore. However, the ASI has also		3/13/3 We po
delay the system security Plan		supporting the SSP is unavailable, outdated, or in a draft form. During April,	(ready for federal partner review) is scheduled for September 15, 2023. The	correct documentation will be available.	assessment.			atternatives and is converting to Google Firestore. However, the ASI has also replaced IBM Filenet in the Secure Enclave with Google Firestore. The ASI		follow
		Implementation statements are currently being written from the perspective	SSP is a large technical document with hundreds of controls and control	with the known tasks related to the IRS Assessment to continue receiving FTI				and DHS have continued working on the NIST 800-53R5 Security Policies. In		schedu
		of how the system should be designed from the SSP author's perspective	enhancements, and each one requires an implementation statement of how	in BES.				addition to the 6 policies the ASI had submitted to DHS and received		relates
		instead of how the system is actually designed. The SSP authors need to	the control or enhancement has been met.					feedback 14 other policies were updated based on the feedback and are		Enclav
		know and use documentation such as System Architecture and Design,		COMPLETE				currently waiting internal review prior to submission to DHS. DHS has a		showe
		network topology, dataflow, ports and protocols, tools used for logging, etc.		Determine when the infrastructure design baseline will be completed. (06/30/2024)				Safeguard Security Report (SSR) due to the IRS at the end of April. The policies that are being written for the BES System need to be reviewed and		schedu
				Perform a full review of all draft SSP controls for content and accuracy				approved by DHS and the process for system level policies is being worked		enclav out)Al:
				prior to the start of the Independent Security Controls Assessment of BES				on by DHS. However, it does not appear the newly written policies will be		mentic
				and submission of the SSP package to federal regulators. This will allow the				approved prior to the IRS SSR submission		tied to
				SSP authors to update controls with changes from Design through						Jira:[B
				Implementation. (9/26/2024)				2/28/2025-The ASI and DHS have been collaboratively working on the NIST		Secure
				 Begin monthly Plan of Action and Milestone update meetings between DHS 				800-53R5 Security Policies per the NIST 800-53R5 control family that will be		Jira foi
				Security and the ASI Security teams to inform each other of progress and				used for the BES System. Drafts for each policy have been created, with 12		projec
				updates made against each POAM. (10/31/2024)				ready for internal review. DHS has reviewed several of the policies and provided additional instruction as to how they should be structured. The ASI		task:A
				CLOSED - Moved to Risk #106				has dropped MongoDB from the Secure Enclave after evaluating IRS		the p chang
				IV&V recommends prioritizing the 82 Critical and High finding POAMs				Publication 1075 compliant alternatives and is converting to Google		Starte
				as a result of the Tenable Nessus Configuration scans. Implementing the				Firestore. Considering that a majority of the documentation and artifacts		Proce
				security configurations later in development may cause the system to				are completed or nearing completion and the extended schedule, IV&V		to sy
				become unfunctional, and require additional development time to fix.				has changed the criticality of this issue to low.		discu
								1/27/2025 - The ASI has rewritten most of the System Security Plan (SSP)		recor
								1/27/2025 - The ASI has rewritten most of the System Security Plan (SSP) responses to meet the requirements of NIST 800-53. They also have worked		if you infor
								on writing new security policies for BES. Of the 19 policies to be written at		like t
pment delays have negatively Fors, Michael Finding -	6/30/2022 Configuration an	d ASI had previously reported development activities have been slowed as	If the ASI is unable to achieve a velocity that enables them to meet planned	OPEN	Immediate	3 3 Med	Open	3/31/2025 - The ASI completed the JAD sessions for the BES Pilot. The		11100
ted the project schedule and delayed Issue	Development	they have been unable to achieve and/or maintain their expected	milestones, schedule delays may lead to a delayed system go-live date.	ASI provides DHS with the time needed to effectively evaluate the software				Change Request (CR) for customer correspondence functionality was		
L		development velocity. Previously, the development team was challenged	Failure to achieve a level of accuracy in estimating development tasks could lead to a project schedule that is flawed and unrealistic. Previously, DHS	demonstrations (demos) and elicit productive design discussions with DHS				identified as requiring substantial effort and is scheduled for completion by		
		with accurately estimating development task level of effort (i.e., story	lead to a project schedule that is flawed and unrealistic. Previously, DHS	attendees during each demo.				the end of the development phase. IVV continues to express concern that,		2/13
		points) and the project has been challenged with producing a project	had indicated, and IVV agreed, that some of these delays were due to some	The project closely monitor progress on development efforts that are				based on past performance, any disruptions affecting correspondence may		for t
		schedule that accurately reflects realistic timelines (see Finding #74). The	ASI BAs lacking the expertise required to create optimal designs and system					leave the project with minimal time to respond without extending the pilot go-live date.		sho
		ASI continues to be challenged with finding qualified resources in a timely manner	specifications that developers could consume without requiring extensive clarification from the ASI BA/SA team. DHS and IVV observed instances	so acegy to avoid derays.				go-nve care.		outs
				COMPLETE				2/28/2025 - The ASI recently submitted an Improvement Plan to DHS that		ensu
			DHS (who may lack software or UI design expertise) to improve, which has					included improvements to address their software development challenges.		is re
			contributed to unproductive design sessions (see Finding #61). It remains					They have reported ongoing improvements because of their reorganization		09/0
			unclear if scope creep has contributed to these delays.	ASI regularly report metrics that accurately track the total amount of				of the development team, implementing more rigorous software		
				remaining work to reach go-live and present a dynamic burndown chart to				development and release practices, thorough unit testing and peer reviews,		Vic
				clearly display progress to stakeholders. (closed 3/31/2025) • ASI effectively track and regularly provide DHS (potentially via the weekly				and the addition of senior skilled resources.		deve add
				 Asi effectively track and regularly provide DHS (potentially via the weekly DDI status meeting) with an accurate velocity (e.g., story points per 				1/31/2025 - The ASI conducted a project restart kickoff on 1/23/2025		900
				day/week/month) and assure that the current velocity is accurately and				where they intend to implement several development (and other) process		
				consistently reflected in the project schedule (closed 2/28/2025)				improvements to increase the quality and efficiency of development. Key		05/3
				DHS request the ASI strategically add the right project team resources to				issues they intend to address include development quality, testing quality,		
				effectively increase velocity. Note that adding additional junior resources				and accumulated technical debt. Mitigation strategies include implementing		As d
				may not be as effective as staffing additional expert-level development,				switching development methodologies from agile to waterfall, improving		mee
				analysis, and other resources that can lead and mentor junior resources.				development discipline and structure, increasing the comprehensiveness of		devi
				 ASI reviews the development process and identifies and mitigates the challenges preventing them from incorporating Epic demo activities into the 				testing, and bolstering their domain knowledge by onboarding additional subject matter experts.		beer on f
				project schedule. (9/29/23 - ASI will not be doing this, with DHS approval)				subject matter experts.		defe
				ASI consider taking steps to increase code quality, including enhancing the						BES
				depth of developer unit testing, tracking and proactively preventing leakage,				12/31/2024 - The ASI continues to make efforts to enhance development		fort
				and enforcing effective coding standards and good governance.				quality and efficiency. They have recently onboarded a senior development		
Project schedule based on inaccurate Molina, Brad Finding -				OPEN	Immediate	3 3 Med	Open	3/31/2025 - The BES project schedule was relatively stable this month		
	Management		constant schedule changes, resources not being available when needed, rushed activities, and general frustration which can lead to schedule delays,	- Monitor, evaluate and revise scheduling estimates for accuracy based on				(minor changes were made), with a few tasks delayed while others were completed earlier than planned. IV&V is updating the criticality rating		
		estimating practices, and ability to manage to the schedule persist. The use		the project teams past performance and resources available to do the				from High to Medium. However, we continue to monitor the minimal slack		
ource management, which could			low quality output scope changes and budget issues							3/1
ource management, which could n late deliverables, cost increases,		of multiple tools to track resources obfuscate resource management.	low quality output, scope changes, and budget issues.	remaining work.				time between the completion of development and the beginning of System		
ource management, which could I late deliverables, cost increases,			low quality output, scope changes, and budget issues.	 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for DHS. 				time between the completion of development and the beginning of System Integration Testing.		The
ource management, which could I late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were	low quality output, scope changes, and budget issues.	 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for DHS. Elaborate the schedule to include the detailed work and tasks required 				Integration Testing.		The proj revi
ource management, which could I late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such	low quality output, scope changes, and budget issues.	Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for DHS. Elaborate the schedule to include the detailed work and tasks required behind milestones, allowing better tracking and visibility of possible issues				Integration Testing. 2/28/2025 - The ASI received final approval from DHS on the revised		The proj revi stak
ource management, which could I late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were	low quality output, scope changes, and budget issues.	 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for DHS. Elaborate the schedule to include the detailed work and takk required behind milestones, allowing better tracking and visibility of possible issues and delays at the task level. 				Integration Testing. 2/28/2025 - The ASI received final approval from DHS on the revised schedule, which was baselined and shared to project team on 2/12/2025.		The proj revi stak
ource management, which could I late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were	low quality output, scope changes, and budget issues.	 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for MFS. Elaborate the schedule to include the detailed work and tasks required behind mitestores, allowing better tracking and visibility of possible issues and delays at the task level. AS develop a mitigation plan for lask of tasks time between development 				Integration Testing. 2/28/2025 - The ASI received final approval from DHS on the revised schedule, which was baselined and shared to project team on 2/12/2025. The first schedule review for the re-baselined schedule was held on		The proj revi stak fees wer
urce management, which could late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were	low quality output, scope changes, and budget issues.	 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for DHS. Elaborate the schedule to include the detailed work and takk required behind milestones, allowing better tracking and visibility of possible issues and delays at the task level. 				Integration Testing. 2/28/2025 - The ASI received final approval from DHS on the revised schedule, which was baselined and shared to project team on 2/12/2025. The first schedule review for the re-baselined schedule was held on 2/26/2025, with seven1 tasks showing a delayed finith state and others with		The proj revi stak feeo wer upd
ource management, which could I late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were	fow quality output, scope changes, and budget issue.	 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for MFS. Elaborate the schedule to include the detailed work and tasks required behind mitestores, allowing better tracking and visibility of possible issues and delays at the task level. AS develop a mitigation plan for lask of tasks time between development 				Integration Testing. 2/28/2025 - The ASI received final approval from DHS on the revised schedule, which was baselined and shared to project team on $2/12/2025$. The first schedule review for the re-baselined schedule was held on 2/26/2025, with several tasks showing a delayed finish date and others with earlier comeletion date: with one similaritant chance of 4 days. Althout		The proj revi stak feed wer upd acco
urce management, which could late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were	low quality output, scope changes, and budget issues.	 Any work required to address findings from Root Cause Analysis should be included in the revised schedule to validate completion for MFS. Elaborate the schedule to include the detailed work and tasks required behind mitestores, allowing better tracking and visibility of possible issues and delays at the task level. AS develop a mitigation plan for lask of tasks time between development 				Integration Testing. 2/28/2025 - The ASI received final approval from DHS on the revised schedule, which was baselined and shared to project team on 2/12/2025. The first schedule review for the re-baselined schedule was held on 2/26/2025, with seven1 tasks showing a delayed finith state and others with		The proj revi stali feeo wer upd acci IV&
urce management, which could late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were		-Any work required to address findings from foot Cause Analysis should be included in the revised schedule to validate completion for GHS. - Elaborate the schedule to include the detailed work and tasks required beind michanoses, advanced genetic tracking and while of possible issues and delays at the task lead. - Ald develop a migration gain for fact of stack time between development completion and task of SH. COMPLETE				Integration Testing. 2/32/0235 - The ASI received final approval from DHS on the revised schedule, which was baselined and shared to project team on 2/12/2025. The first schedule review for the re-baselined schedule was held on 2/32/0235, with seven lasks showing a delayed finish data and others with earlier competion dates; with one significant change of 44 days. Although more of these changes directly added ratio the schedule, NKRmy, V		The pro revi stal fee we upd acc IV& the det
urce management, which could late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were		-Any wark required to address findings from foot Cause Analysis should be included in the revised-table to validate comparison for OLS. -Biobort the activative in include the detailed werk and tasks required address at the state in the state and and obtaining of possible states -Ad detailed and and at and of ALS. -Comparison of the state of t				Integration Testing. 2/28/2025 - RAF received final approval from DHS on the revised schedule, which was baselined and shared to project team on 2/12/2025. The first checke review for the re-baselined checked with dia //2/2025, with sweet loads schedule as a divert with /2/2025, with sweet loads schedule as a divert /2/2025, with swe		The pro stai fee wer upd acc IV& the det wat
urce management, which could late deliverables, cost increases,		Previous IV&V findings focused on specific schedule components such as resource management and critical path analysis, all of which were		-Any wark required to address findings from foot Cause Analysis should be included in the revised-table to validate comparison for OLS. -Biobort the activative in include the detailed werk and tasks required address at the state in the state and and obtaining of possible states -Ad detailed and and at and of ALS. -Comparison of the state of t				Integration Testing. 1/28/2023 - The Sel Income final agencial from Diffs on the venter 1/28/2023 - The Sel Income final agencial from Diffs on the venter Testing of the Sel Income final agencial from Diffs on the venter 1/26/2023, with several tasks showing a delayed finish date and others with different one-plotted dates, with one significant charge of 4 days. Although now of these charges directly added risk to the schedule, ViAampyV remains concerned the directestimated tasks could start to impact the critical gain and disky implementation dates. 12/12/2023 - Atte each of the month, the AI was vertices with all 12/12/2023 - Atte each of the month, the AI was vertices with all 12/12/2023 - Atte each of the month, the AI was vertices with all		The proj revi stak feeo wer upd accc IV& the deta was
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unce management, which could tail deliverable, cost increase, a go live.	10/28/2021 System Design	Previous NRampU findings focused on specific schedule components such as renource management and critical path analysis, all of which were addressed and cloud.	If the level of effort to implement and manage the complexities of the BLS infrastructures is not accurately accounted for and staffed by the AS, the species could for much imagecide close and schedule delays. Delays in and lead to theme delays. Complex platform often present system maintanance and potential for system failure (i.e., due to the significant number to decommong particulation) and increase the wind in them accurated potential for system failure (i.e., due to the significant number to decommong particulation). The optimizer accurate the system maintanance and potential for system failure (i.e., due to the significant number to decommong particulation). The optimizer compared to their lapsort components remain in an immation static compared to their lapsort to the size is a manage, the poper concession. Goage Could a presently to the size is a managed, the poper concession. Goage Could a presently the Services. Microards Azurd, Nakamp V remains concerned to this production failure (1) tat could be difficult to reade and last to poper production failure) that could be difficult to reade and last to poper production failure). That could be difficult to reade and last to poper production failure). That could be difficult to reade and last to poper production.	-Any wark required to address thinking from host Cause Analysis should be included in the revised checken to validate completion for DTS. -Biodraft the schedule to include completion for DTS. -Biodraft the schedule is no include the detailed work and tasks required and address at the task include the include cause of the detailed work and tasks required and details at the schedule is no include the detailed work and tasks required and details at the schedule is no include the detailed work and tasks required and details at the schedule is no include the details work and tasks required and details at the schedule is no include the details. The details work and tasks required and details at the schedule is and tasks in the between development completion and start of site. COMPLIFIE COMPLIFIE CO	Next several months	2 2 Low		Integration Teaching: 2012/2012 - The Shore of their agencies from Disk on the result Scheduk, which was backlined and shared to project tamo in 2/12/2012 the fract schedule cryster for the backlined schedule was hidd on 2/16/2012, whit sweet lasks shored in a project tamo in 2/12/2012 their schedule cryster for the backlined schedule was hidd on cryster and the schedule of the the schedule of the schedule of the schedule cryster and the schedule of the schedule of the schedule schedule cryster and the schedule of the schedule of the schedule cryster and the schedule of the schedule of the schedule schedule cryster and the schedule of the schedule of the schedule schedule cryster and the schedule of the schedule of the schedule schedule cryster and the schedule of the schedule of the schedule schedule cryster and schedule as any schedule cryster schedule. The schedule schedule cryster and schedule are project schedule in the schedule cryster and schedule are project schedule. The schedule schedule cryster and schedule are project schedule in the schedule cryster and schedule are project schedule. The schedule schedule cryster and the schedule schedule schedule in the schedule schedule schedule schedule schedule schedule in the schedule schedule schedule schedule schedule schedule in the schedule schedu		The projoin review of the stability of t

8/22/24 - The ASI continues to make progress in building out the finalized

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		Finding	Identified							Analyst	Finding		
ID Title	Reporter	Туре		Category	Observation	Significance	Recommendation	Event Horizon	Impact Prob	ability Priority	Status	Status Update Client Comments	Vendor Comments
70 Insufficient configuration management	Fors, Michael	Finding -	8/23/202	1 Configuration an	The BI-6 DDI Plan Deliverable, Section 5.2 establishes the framework for the		OPEN	ASAP	2	2 Low	Open	3/31/2025 - The ASI has reported progress in updating the project	
could lead to development confusion and		Risk		Development	Configuration Management Plan, however, it remains unclear if sufficient		 ASI adhere to plans for configuration management as documented in BI-6 					Configuration Management Plan (CMP).	
reduce the effectiveness of defect resolution	an				progress has been made toward establishing CM processes and governance		DDI Plan, Section 5.2 and clarify details and/or any changes with DHS.						
						e Management that may reduce errors and should provide the project team	•ASI validate plans for configuration management with DHS and agree on a					2/28/2025 - The ASI has reported progress in constructing their	9/9/2024
					projects Security Plan has yet to be finalized which may include additional	with accurate, dynamic and timely information on some of the configuration						configuration management database within ServiceNow, having recently	Still in progress. Plan
					requirements or decisions that could impact CM. The project currently	items. However, it is critical that DHS/ASI agree to the full list of items that						imported multiple configuration items (CIs).	to update
					relies on Github for tracking of some configurations.	are included in the configuration plan along with the details regarding the							Configuration
						management of the configuration items, reporting and audit features.	•BHS and ASI work to clarify/solidify plans for the potential use of					1/31/2025 - No material update.	Management Plan list
							configuration management tools.					12/31/2024 - No material update.	of items. Two
							•Identify the DHS POC for the Configuration Management Activities that					11/30/2024 - This finding will be reevaluated by the IVV team after the	documents,
							would provide oversight of configuration management activities and assure defined CM steps and plans are being followed, are effective, and are	6				project team completes the re-planning and determines the approach, requirements/functionality, and schedule for the Pilot and Statewide rollout.	management plan (end of week).
							defined LM steps and plans are being followed, are effective, and are achieving DHS objectives for CM. 7/31/2022					requirements/functionality, and schedule for the Pilot and Statewide rollout.	(end of week), Configuration
							achieving DHS objectives for CM. 7/31/2022					10/31/24 - This finding will be reevaluated by the IVV team after the project	Management
												team completes the realianting and determines the approach.	procedures (more
												requirements/functionality, and schedule for the Pilot and Statewide rollout.	detailed). Working
													with Mark M on what
												9/26/24 - The ASI had recently stated they plan to update their	should be included.
												Configuration Management Plan (CMP) list of configuration items (CIs) and	Trying to work with
												CMP procedures by 9/20/24 but has since experienced some delays in	folks who really
												completing these activities.	understand the details
													and are available.
												8/22/24 - IVV has yet to receive a detailed, comprehensive list of	
												configuration items the ASI will be tracking.	
												7/26/24 - No material update for this reporting period.	10/31/2023 -
												6/20/24 - No material update for this reporting period.	Vic - We provided a
												5/31/24 - IVV has yet to receive a detailed, comprehensive list of	listing, working on a
												configuration Items the ASI will be tracking.	plan to implement.

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