

Prepared for

**Florida Department of
Economic Opportunity**

**January 2023 Quarterly IV&V
Assessment Report**

**For period beginning October 1, 2022,
and ending December 31, 2022**

FINAL DOCUMENT

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1.0 Introduction

The Florida Department of Economic Opportunity (DEO) works in collaboration with public and private partners to advance Florida's economy for every Floridian by championing the state's economic development vision and implementing initiatives to help citizens, communities, businesses, and visitors thrive.¹

During the pandemic, DEO received a record number of Reemployment Assistance claims. Initial claims increased over 100-fold from less than 5,000 claims per week in March 2020 to over 500,000 claims per week in April 2020.² This unprecedented volume created significant pressure on DEO, its employees, and especially its technology.

To address the volume in the short term, DEO made substantial investments to manage and stabilize its legacy technology. In parallel, DEO initiated a two-year program that recognized the compelling need and opportunity to continue its pre-COVID modernization effort via the Reemployment Assistance Claims and Benefits Information System Modernization Program (or "Program"). The Program is focused on building a flexible, scalable, secure, and user-friendly system that strengthens Program integrity and accelerates Reemployment Assistance services across the State of Florida leading to enhanced citizen outcomes.³ Additionally, this Program sets the foundation for continuous ongoing modernization for further improvements beyond the conclusion of the initial two-year effort.

The purpose of these Quarterly IV&V Assessment Reports is to outline the overall Program risk across a set of mutually agreed upon risk dimensions and categories.

IV&V Approach

Independent Verification and Validation (IV&V) services began on July 30, 2021 as part of the Program. IV&V services provide independent third-party monitoring focused on identifying and assessing risks which may impact the success of the Program as well as providing recommendations, and/or considerations, on how to mitigate and/or prevent risks moving forward.

DEO has established the following IV&V guidelines with the intent of ensuring the IV&V team provides independent insights on potential risks within the Program. These guidelines are not intended to limit the IV&V team's independence or access to information and any reasonable request for additional information would be honored.

1. DEO will identify the specific Program and project meetings that IV&V can attend. The IV&V vendor will be an observer in meetings and not an active participant. Questions are reserved for clarification purposes.
2. The IV&V vendor will provide DEO Program Leadership with guidance to consider for the mitigation of identified risks, but not provide direct recommendations. This allows IV&V to maintain its independence and objectively evaluate risk mitigation over time.
3. DEO will provide documentation and other Program/project artifacts, including solicitations, for IV&V review. Documentation and artifacts will generally be penultimate or final drafts to ensure IV&V focuses its oversight efforts on DEO-approved documents. IV&V may request additional documentation as needed.

¹ [Vision and Mission](#), Florida Department of Economic Opportunity

² Improved Delivery of Reemployment Assistance Benefits – Final Report, ISF, February 18, 2021

³ [Reemployment Assistance Modernization](#), Florida Department of Economic Opportunity

4. IV&V continues to attend Program change request review meetings and analysis discussions. Attendance at these meetings allows IV&V to identify observations and risks related to change requests prior to final DEO decisions.
5. New IV&V observations would not immediately be added to the risk register. Instead, such observations would be tracked separately and discussed with the DEO Program Leadership to gain greater clarity. Observations may be elevated to risks and, conversely, risks may be de-escalated to observations. In rare occasions when a risk is urgent, i.e., the impact could be critical to the Program or the likelihood is imminent, IV&V would raise risks directly on the risk register.
6. IV&V’s scope does not include any review of source code or technical artifacts of the CONNECT Reemployment Assistance Claims and Benefits Information System.

The IV&V approach is evidence-based and leverages a comprehensive risk assessment framework for risk reviews organized across key dimensions and categories. Table 1 outlines the risk dimensions and categories used to assess the Program.

Table 1. IV&V Risk Assessment Dimensions and Categories

Risk Assessment Dimension	Risk Assessment Categories
Strategy and Business Value	<ul style="list-style-type: none"> <li style="width: 50%;">• Business Strategy Alignment <li style="width: 50%;">• Benefits Realization
Governance	<ul style="list-style-type: none"> <li style="width: 50%;">• Executive Support <li style="width: 50%;">• Program Organization <li style="width: 50%;">• Program Tracking <li style="width: 50%;">• Risk and Issue Management <li style="width: 50%;">• Communication and Collaboration
Delivery Assurance	<ul style="list-style-type: none"> <li style="width: 50%;">• Scope Management <li style="width: 50%;">• Software Development Lifecycle <li style="width: 50%;">• Quality Assurance <li style="width: 50%;">• Mitigation and Release Strategy <li style="width: 50%;">• Post Release Support
Suppliers Management	<ul style="list-style-type: none"> <li style="width: 50%;">• Sourcing Strategy and Contracts <li style="width: 50%;">• Supplier Performance <li style="width: 50%;">• Suppliers Knowledge Transfer
Financials	<ul style="list-style-type: none"> <li style="width: 50%;">• Financial Baseline <li style="width: 50%;">• Change Requests Estimation <li style="width: 50%;">• Financial Tracking
People	<ul style="list-style-type: none"> <li style="width: 50%;">• Program Organization Staffing <li style="width: 50%;">• Organizational Change Management <li style="width: 50%;">• Training
Technology and Architecture	<ul style="list-style-type: none"> <li style="width: 50%;">• Architecture and Design <li style="width: 50%;">• Architecture and Technical Governance <li style="width: 50%;">• Architecture Quality <li style="width: 50%;">• Data Management

2.0 Risk and Issue Assessment Summary

This quarterly assessment covers the reporting period beginning October 1, 2022 and ending December 31, 2022. Figure 1 summarizes the level of risk across the seven assessment dimensions described in Table 1 from the previous section.

Figure 1. Reemployment Modernization Program Risk Heat Map



- Low risk, minimal impact to Program or project success if realized.
- Medium risk, material impact to Program or project success if realized and will require significant attention but may or may not impact the critical path, budget, or scope.
- High risk, significant material impact expected to the critical path, budget, or scope if realized.

Key changes since prior quarterly report:

- All risk dimensions have the same risk rating as the previous Quarterly Assessment Report.
- In this reporting period, improvements in several areas resulted in the closing or lowering of associated risks.
 - In this reporting period, DEO shifted its strategy to address Program delays and focus efforts on the top priority Program objectives targeted for the June 30, 2023 milestone. DEO outlined revised plans for each project in the Agency's December 2022 Monthly Report and Packet. Related Program and project artifacts such as Project Plans, Spend Plans, Schedules, and Benefits Register are in the process of being updated to reflect this change. As a result, IV&V has closed one High procurement-related issue and lowered the issue rating for another procurement-related issue (see Section 4 for more details).
 - DEO developed a Program Testing Standard Operating Procedure (SOP) to support consistent testing practices by defining standardized testing processes and required test documentation that remaining projects in the Program can follow. The development of this SOP will be crucial to ensure effective testing practices are consistently followed in the Program especially in projects that involve vendor-led testing.
 - Other Standard Operating Procedures for ServiceNow and Vendor Management have also been developed in this reporting period to improve Program and project management standards.
 - DEO decided not to procure a Master Data Management (MDM) tool as this is not required to deliver the initial project scope as described in the ISF report (i.e., data catalog and the data dictionary). This has eliminated the risk associated with MDM tool procurement delays and helped focus resources on the top priorities for the June 30, 2023 milestone.
 - DEO updated its plans for projects nearing completion to account for activities needed to transition to operations. This has helped, and will continue to help, prepare DEO for a smooth transition after go-live and help ensure resources are prepared to maintain the System after go-live.

- DEO worked with the SSI vendor to change the SSI deliverable schedule. This was done to address the Ongoing SSI Deliverable Delay issue (which has been closed; see Section 4). A contract amendment reset expectations on the deliverable content and adjusted the schedule for the SSI's initial delivery of the deliverables and ongoing deliverable maintenance throughout the project. Deliverables are now being submitted in a timely manner per the revised schedule.
- In this reporting period, the following risks and issues have been identified.
 - DEO is currently procuring a Contractor to implement the Customer Experience/User Experience (CX/UX) project, Business Rules Engine (BRE) project, and SOA/API project. Until a Contractor is onboarded, the scope and schedule of each project remains unclear. Scope and schedule definition for CX/UX, BRE, and SOA/API projects is expected to be an early focus for the next reporting period. IV&V will reevaluate project plans when they are available, but in the meantime, the lack of clarity poses risk to the timely achievement of Program objectives.
 - The risk of delays to the CX/UX and Identity and Access Management (IAM) procurements have been realized and these are now being tracked as Issues. The DEO team is targeting a mid-late January date to onboard the CX/UX vendor, which would be weeks later than planned. Delays could continue to add pressure on projects that have been identified as critical path by DEO Leadership. For IAM, DEO has revised the procurement scope from an enterprise tool procurement to procuring services to update the System's security policies and procedures as a simplified means to achieving IAM project objectives.
 - The planned CONNECT to Cloud (C2C) project deployment was delayed from December 2022 to January 2023 due to several issues including licensing delays, database performance, and TOP Tenant Server deployment (refer to C2C project delay issue in Section 4 for more information). The Program is working through these issues systematically.
- In this reporting period three projects were completed, including Business Process Optimization, .NET and ORM Upgrade, and Security Architecture Review Services. In the next reporting period, two projects are expected to be completed: Reporting and SDLC – DevOps.

At present, there are three low risk dimensions with minimal impact to Program success if realized:

Strategy and Business Value – DEO Leadership is revising the Program strategy to mitigate delivery risk introduced by earlier procurement delays. The procurement delays had cascading effects throughout the Program and caused multiple Change Requests to re-baseline project plans. The updated strategy is a result of a self-assessment the DEO leadership team conducted to target the most critical components of the Program that drive improvements in System stability and user experience by June 30, 2023. The remaining components of the Program will be delivered during Continuous Modernization (beginning July 1, 2023). The updated Program strategy was described in DEO's December 2022 Monthly Report and Packet. As part of this effort, DEO is re-baselining the scope, schedule, and budget of each project.

The overall Program benefits realization plan is being updated and re-evaluated by DEO leadership. This will be critical to ensure the success of the Program in achieving intended benefits both during the Program (i.e., by June 30, 2023) and in Continuous Modernization (i.e., after June 30, 2023)

As part of the change in Program strategy, projects had partial activities and/or scope removed from the June 30, 2023 timeline. In some cases, scope was deferred because it was not deemed critical for the achievement of the original Program objectives planned for RA Modernization and was expanded from the original ISF scope (e.g., MDM and IAM enterprise tool procurement). In other cases, scope was deferred because it could not be completed with high quality in the remaining time available (e.g., archival and purging of data and the implementation of optimized business processes into CX/UX portal, as laid down in the original ISF report).

One project, Security Architecture Audit Services, has been deferred in its entirety to Continuous Modernization (beginning July 1, 2023). Per the ISF report, this project was initially scoped to audit the System's security architecture to include penetration testing, review of access controls, and audit of other application architecture components. However, DEO concluded that the audit should be conducted after the System is further along in its modernization in order to maximize its impact, and that it will not be completed by the June 30, 2023 milestone.

- **Technology and Architecture** – Data management practices are being formalized to support improved management of data (e.g., master data management, archival and purging of data).
- **Governance** – DEO and the Strategic Planning Office (SPO) have been executing based on a defined governance process. IV&V continues to monitor the efficacy and application of this governance process towards effective decision making. Three Change Requests were approved in the past quarter to refine scope of various projects (SOA/API, Master Data Management & Interoperability, Identity and Access Management, Archive & Purge and Security Architecture Audit) and to address project delays ranging from a few weeks to few months (BPO, .NET and ORM upgrade, SDLC-DevOps and C2C Deployment date).

While overall risk in the Governance dimension is low, there is one open medium risk regarding the governance of procurement related decisions. To mitigate this risk, DEO identified reviewers from relevant internal stakeholder groups to support the evaluation of vendor responses. Additionally, instructions have been provided to reviewers to ensure a consistent and objective review process is followed. DEO could formalize this process for any future procurements to increase process maturity.

Program Governance will also need to be adjusted and carried forward, as appropriate, for projects and tasks that extend into Continuous Modernization to ensure proper and effective management.

There are two medium risk dimensions, where a material impact to the Program is possible if risks are realized, but would not necessarily disrupt the overall implementation plan:

- **People** – As projects (e.g., CXUX, SOA/API and Business Rules Engine) enter the execution phase and there is a drive to complete the Program by June 30, 2023, availability of DEO staff will be increasingly important and will need to be actively managed. Additionally, DEO staffing required to support the Technology Tools RFQ is not yet fully defined as the vendor selection process is ongoing. DEO is actively evaluating internal staff resource usage and allocation through June 2023 to reduce possible resource contention across the Program.

DEO reports that all known resource staffing needs are filled. However, labor market competitiveness in the IT industry may continue to be a driver of future staffing challenges.

In response, DEO continues to implement policies to improve its attractiveness to potential candidates (e.g., introduction of remote work policies) and continues to leverage staff augmentation where appropriate.

- **Financials** – In the Financials dimension there is one medium risk related to the clarity of the financial health of the Program. The Program continues to refine the process to manage Program and project finances. Regular spend plan reconciliation meetings are occurring to improve the accuracy and transparency of financials. The Program is also working to improve the granularity of the spend plan in response to the change in Program strategy. The Finance team expects that increased granularity and transparency on actual and projected spend will improve the fund release process and allow the Program to receive funds ahead of expected expenses. DEO has submitted a Legislative Budget Request to fund the first year of Continuous Modernization.

There are two high risk dimensions where significant material impact to the Program's critical path schedule, budget, and/or scope would be expected if the risks are realized.

- **Delivery Assurance** – This dimension remains at high risk due to delays in ongoing projects, including, SSI, Rules Engine, SOA and API, MDM, CX/UX Mobile Responsive Software Transformation, and Archive & Purge. These delays occurred due to risks and issues around rejected deliverables, requirement gathering difficulties, and procurement delays. DEO has taken steps to mitigate these delays and respond to issues. DEO and the SSI vendor have agreed on a contract amendment to clarify expectations and timeline for SSI deliverables and deliverables are now being delivered on time per the revised schedule (see closed issue around Ongoing SSI Deliverable Delay in Section 4). Requirement gathering sessions are progressing well and effectively mitigating requirements gathering delays for the Archive & Purge project (see closed risk around Archive and Purge Requirement Blockers in Section 3). And, finally, the procurement of Technology Tools (CX/UX, Business Rules Engine and SOA/API) and IAM are progressing but falling behind schedule (see open issues around various procurement delays in Section 4).

The Program team continues to develop a Program-level schedule that maintains all dependent tasks and activities. Additionally, to help mitigate the delivery assurance risk associated with project delays, DEO revised the Program strategy to focus on the delivery of the most critical Program components by June 30, 2023 with the remaining components being delivered in Continuous Modernization after June 30, 2023. See Strategy and Business Value risk dimension above for additional details.

During the previous reporting period, DEO made the decision to use an agile and iterative approach for the remaining projects and into Continuous Modernization. This includes, in part, extending existing agile practices currently employed at DEO. The details behind the agile and iterative approach for RA Modernization are expected to be defined after the CX/UX Contractor is onboarded in January 2023. This will be important as projects often fail due to undisciplined or loosely defined agile practices.

- **Suppliers Management** – This dimension remains at a high risk due to ongoing challenges and delays in procurements impacting four projects (i.e., CX/UX, Business Rules Engine, SOA/API and IAM).

The Technology Tools procurement supporting the CX/UX, Business Rules Engine, and SOA/API projects was advertised on November 15, 2022. A vendor was expected to be selected by the end of December 2022 but will likely be selected by mid-late January 2023 as the evaluation process continues. The delay could negatively impact an already

aggressive schedule. Given the scope of work to be completed before June 30, 2023, careful management of the vendor and the associated projects is required.

The IAM procurement, posted on September 30, 2022, received inadequate vendor responses. Consequently, the Program decided to adjust the IAM project scope, and issued a new Management Consulting Services procurement focused on developing IAM policies and procedures that will support modernization without procuring an IAM tool, as the IAM tool was considered to be not critical for the achievement of the original Program objectives and was expanded from the original ISF scope. The new procurement was issued on December 28, 2022, and vendor responses are expected in January 2023. While the IAM project schedule has been updated to reflect the new scope, IV&V continues to monitor this procurement via the “IAM Procurement and Project Delays” issue.

3.0 Risk Assessment Details

This section describes the specific risks behind the risk ratings provided in the previous section. The risks are organized into sub-sections, one for each of the risk dimensions. The following information is provided for each risk:

- **Risk Name** – each risk has been named to facilitate easy reference.
- **Applicability** – indicates which projects within the Program the risk applies to, or if the risk is Program-wide. See Table 2 below for more information on the projects that comprise the Reemployment Assistance Claims and Benefits Information System Modernization Program.
- **Date Identified** – specifies the initial date the risk was identified.
- **Previous Risk Rating** – shows how the risk was rated as of the previous quarterly report.
- **Current Risk Rating** – shows how the risk has been rated currently. See Figure 1 for risk rating definitions.
 - Where DEO has demonstrated it sufficiently mitigated a risk, the risk is marked “closed”. Closed risks will only be listed in the quarter they were closed and will not appear in future quarterly reports unless the risk is reopened.
- **Risk Description** – provides a brief, summary-level description of the risk.
- **Potential Impacts** – describes the potential impacts to the Program or project if the risk is realized. This content focuses on the most significant potential impacts.
- **Considerations** – provides options for DEO to consider regarding addressing or mitigating the risk.
- **Actions Taken by DEO** – summarizes key actions taken by DEO regarding the risk.

The Program is comprised of sixteen projects (not including procurements listed as projects in the ISF report), ten of which are “Active and in Progress”, five have been “Closed” and one project has been “Deferred to Continuous Modernization”. DEO deems a project active when a Project Manager is assigned, and project teams have started to meet on a regular basis and are producing project-related deliverables. Table 2 below summarizes at a high-level the current state of projects and their status per DEO.

Table 2. Reemployment Assistance Claims and Benefits Information System Modernization Projects and Status as of December 31, 2022

Project Category	Project Name	Project Status
Infrastructure	Cloud Migration (CONNECT to Cloud)	In Progress
	Cloud Application Performance Management	In Progress
Software	Software Development Lifecycle (SDLC)	In Progress
	.NET and ORM Upgrade	Closed
	SOA and API Layer	In Progress
	Rules Engine	In Progress
	CX/UX Mobile Responsive Software Transformation	In Progress
	Business Process Optimization	Closed
	RA Help Center	Closed
Data and Analytics	Data Warehouse	Closed
	Reporting	In Progress
	Archive and Purge	In Progress
	Master Data Management and Interoperability	In Progress
Security	Security Architecture Review Services	Closed
	Identity Management & Access Control	In Progress
	Security Architecture Audit Services	Deferred to Continuous Modernization

3.1 Strategy and Business Value

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Informal Benefits Realization Approach	Program	10/26/2021	Medium	Medium	A formalized benefits realization strategy and plan with clear metrics and progress towards a target benefits tracking approach is not yet in place.	<ul style="list-style-type: none"> Challenges determining if an individual project, or the Program as a whole, achieved expected benefits, including those target benefits identified in the ISF report. Without agreed upon key performance indicators (KPIs), stakeholders may have different views on the degree benefits were realized or not. Decreased ability to identify opportunities to make in-flight adjustments to projects-based benefits realization monitoring. Projects may be closed prematurely in cases where target benefits were not sufficiently achieved. 	<ul style="list-style-type: none"> Develop a benefits realization strategy and management process, including: <ul style="list-style-type: none"> Defined set of target benefits for the Program. A benefits realization plan that details specific measures and monitoring processes. A process for reporting on progress towards target benefits to key stakeholders. 	<ul style="list-style-type: none"> DEO Program Leadership has been working on refining project benefits to reflect the current scope changes. There have been several benefits related discussions conducted by DEO that IV&V has observed. All projects, except for two (Archive & Purge and Business Process Optimization) have been re-evaluated and are under IV&V review.

3.2 Governance

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Governance regarding the procurement related decisions, and decision-making process, are unclear	Program	5/18/2022	High	Medium	The governance regarding the selection of tools is not fully formalized. This risk is two-fold: the decision-making process and evaluation criteria to make tooling decisions necessary for the Program. Additionally, the governance process around when and how those recommendations will be delivered to DEO may have included decisions made without a full understanding of the impact.	<ul style="list-style-type: none"> Inadequately defined governance in this case could cause selection of the incorrect tool or tool procurement delays and that impact project schedules / quality. 	<ul style="list-style-type: none"> Tooling decision-making governance could be formally structured with clear roles and responsibilities, RACIs and a clear decision-making process to encourage timely and effective decision making. Full impact of decisions should be understood and documented. A formalized evaluation criteria could be established that looks at different factors such as technical and business alignment, implementation effort, cost and time to implement. Formalizing such a criteria would help ensure procurement decisions are made consistently and comprehensively. 	<ul style="list-style-type: none"> DEO states the Program Workgroup will decide on who should review vendor responses for different RFQs. Subject matter experts will be leveraged to ensure different perspectives are considered (e.g., technical, business, procurement) in RFQ reviews. For the current procurement of combined Technology Tools vendor, DEO has identified reviewers from various stakeholder groups including architecture, IT, Contracts and SSI vendor. Due to the type of procurement i.e., RFQ, DEO didn't have a state requirement to develop a formal evaluation criterion. Instead, specific instructions have also been shared with reviewers to ensure consistent and objective reviews. Due to the progress made, this is being lowered to a Medium risk.

3.3 Delivery Assurance

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Rules Engine Project Delay	Rules Engine	8/31/2022	High	High	The Rules engine project continues to be delayed because of no firm identification and finalization of business rules to be migrated. This could take considerable effort that could potentially push the project schedule out further.	<ul style="list-style-type: none"> With continuous delays, there is a high likelihood of the project pushing past June 2023, potential scope reduction, sub-standard delivery, or that the benefits outlined for Rules Engine by the ISF report may not be adequately delivered. Such delays could also impact dependent projects such as CX/UX. 	<ul style="list-style-type: none"> DEO could define formal criteria to refine the selection of business rules to be moved into the new tool. Additionally, they could group rules by priority of implementation to stagger development and testing efforts. The prioritization effort should conform to the benefits outlined in the ISF report. 	<ul style="list-style-type: none"> DEO's analysis of currently existing business rules has identified that the process of developing the business rules catalog is labor-intensive and time-consuming and cannot be completed until Program end date of June 2023. As a result, DEO has shifted its strategy for the Business Rules Engine (BRE) project to design and develop business rules needed for the CX/UX portal, instead of the current System's business rules. Additionally, all ALM tickets since the inception of the System have been analyzed and approximately 100 tickets were identified as potential rule changes. These tickets will be cross referenced with TFS and the next steps will then be decided.
Scope and Schedule for CX/UX project is undefined	CX/UX	11/3/2022	N/A	High	The scope and timeline for the CX/UX project is not defined yet. The ISF report estimated the project to run for 12 months, but current Program timelines only have 8 months remaining.	<ul style="list-style-type: none"> Lack of defined scope and the corresponding timeline will jeopardize the successful delivery of the CX/UX project by the Program end date of June'23. Completion of CX/UX project is critical to the success of the RA Modernization program and DEO's strategic objectives as it is the most impactful to the end users. 	<ul style="list-style-type: none"> The CX/UX project is aimed at stream-lining the benefits claim process for Florida residents and to support them in their times of need. DEO should actively prioritize to define the scope of the project and the associated timeline, to set them up for success. Given the short-time, DEO could look to prioritize certain aspects to define a Minimum viable product for CX/UX that can be achieved by June 2023 and develop a roadmap for future modernizations efforts. 	<ul style="list-style-type: none"> DEO has identified a high-level scope for the CX/UX project to develop mobile-responsive screens and incorporate plain language. However, the details behind this (i.e., which modules would be impacted, and which existing screens will be migrated to the CX/UX portal) are yet to be defined. Once the CX/UX vendor is onboarded in January, a clearer scope and schedule will be available. Until then, lack of CX/UX project scope doesn't allow dependent projects (i.e., SOA/API and Business Rules Engine) to fully define their project scope and understand which and how many APIs and business rules will be developed until June 30, 2023. DEO is currently procuring a Communications and Plain Language Consulting vendor that will assist in creating plain language for the CX/UX portal. This will help users better understand the language used and mitigate confusion when interacting with the new portal.

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Program-wide clarity on a viable schedule to achieve Program objectives	Program	7/29/2022	Medium	Medium	It is currently unclear what the impact of schedule delays is; it is unclear if all Program objectives will be achieved in the dedicated timeframe and, if not, which objectives will be prioritized.	<ul style="list-style-type: none"> Without clearly understanding the impact of schedule delays, it is difficult to evaluate the Program's ability to meet stated objectives in the allotted timeframe. 	<ul style="list-style-type: none"> DEO could increase clarity on managing non-approved / baselined schedules. 	<ul style="list-style-type: none"> Two more change requests have been approved that changed the schedules of four projects. (SDLC, .NET and ORM, CONNECT to Cloud, Master Data Management, and Identity and Access Management) Security Architecture Audit has been taken out of the schedule of RA Modernization and placed into Continuous Modernization. DEO states schedules for the remaining projects, along with identification of dependent tasks between projects, will become clearer after the technology vendor is onboarded in January.
Business and Technical documentation	Program	9/21/2021	Low	Low	Interviews with DEO stakeholders highlighted obsolete technical design and business process documentation.	<ul style="list-style-type: none"> Obsolete documentation can lead to a high degree of technical debt. Additionally, lack of up-to-date documentation could impact business and technical knowledge transfer between vendors and Program resources. 	<ul style="list-style-type: none"> DEO could institute new policies and procedures to create a baseline of updated business and technical documentation and a discipline for maintaining System artifacts. 	<ul style="list-style-type: none"> DEO has instituted a process to ensure technical specifications for future releases are documented and kept up to date. Sample technical specifications have been shared with IV&V and are deemed to be satisfactory. While this is a step in the right direction, this process doesn't fully mitigate the risk of obsolete technical and business documentation. This risk is to be monitored for a few months after vendors are brought on board to ensure there are no impacts of obsolete documentation during their onboarding or project execution.

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Transition to Operations Time	.NET and ORM Upgrade; SDLC-DevOps	8/26/2022	Low	Closed	ServiceNow project schedules did not have adequate planning or time consistently allocated to transitioning to operations tasks. Tasks related to this transition are poorly defined in the case of these projects.	<ul style="list-style-type: none"> Without enough time to transition to operations, the project could either be poorly transitioned or at risk of delay. 	<ul style="list-style-type: none"> DEO could begin planning a detailed schedule now for transitioning to operations, helping mitigate delays and uncertainty down the road. 	<ul style="list-style-type: none"> For project schedules that have been created thus far, DEO has added dedicated tasks to support transition to operation for projects where necessary. As a result, transition activities were added for SDLC-DevOps project and ORM portion of the .NET and ORM project. Transition and Operation artifacts were accordingly shared and reviewed by IV&V. Because of this, the risk is now closed.
Archive & Purge Requirement Gathering Blockers	Archive & Purge	9/26/2022	Low	Closed	Archive & Purge project is facing challenges in gathering the project requirements due to (1) SME turnover which has led to loss in business expertise around retention requirements and (2) DEO's records management policy being outdated.	<ul style="list-style-type: none"> Delays in the requirements gathering phase could impact the timeline to issue an RFI for the Archive & Purge tool and other dependent project activities. 	<ul style="list-style-type: none"> Further discussion around how to effectively staff the SMEs for this effort could be required, as it is noted that the lack of resources is not "availability" related but attributed to staff turnover and subsequent knowledge loss. DEO could continue to mature its data practices that have a dependency on the Archive & Purge project. 	<ul style="list-style-type: none"> The Archive & Purge PM has held requirement gathering sessions with all business units and the exercise is progressing well. Due to the progress around gathering requirements for this project, this risk is now closed.

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Missing Program-Wide Testing Strategy	Program	4/14/2022	Medium	Closed	Detailed testing strategy for the Program is not yet formalized despite several projects being well under way.	<ul style="list-style-type: none"> Lack of defined testing strategy for the project could lead to inconsistent understanding of testing practices that projects should follow at a minimum scope of various testing types and thus could impact the Program's quality and overall timeline. 	<ul style="list-style-type: none"> DEO could look to develop a detailed testing strategy. 	<ul style="list-style-type: none"> DEO has created a Program Wide Testing SOP that defines standardized testing practices and documentation to be followed by all Program stakeholders i.e., (internal DEO staff and vendor resources). This SOP was shared with IV&V and deemed to be satisfactory, therefore, the risk is now closed.
TOP Server Build Delayed	C2C	11/11/2022	N/A	Closed	TOP server build has been delayed due to MFA license delays. Further delays could cause delays to CONNECT to cloud deployment.	<ul style="list-style-type: none"> Delays to TOP server build could delay go-live date. DEO has stated that TOP has no additional dependencies, though delays to CONNECT to Cloud deployment could affect other projects. 	<ul style="list-style-type: none"> DEO could determine what, if any, parts of the build can be parallelized or if additional resource focus could ensure build remains on schedule. 	<ul style="list-style-type: none"> This risk was closed shortly after raising it as it is now being mitigated through issue "C2C Project Delays". Please refer to Section 4 below for further information.
No clear plan defined to iteratively develop the RA Modernization Target State Architecture	SSI; Program	12/12/2022	N/A	Closed	SSI's amended contract has shifted the Deliverable 10's strategy to only record the "Description and Methodology for the Architecture Program" as an initial foundational block and thereafter develop the target architecture iteratively. However, there are no clear timelines of when the target state architecture for the RA Modernized System will be developed.	<ul style="list-style-type: none"> Lack of a clear roadmap for developing the target state architecture for the RA Modernized System could lead to uncertainty around how the current technology landscape would integrate with additional components that will be introduced as part of the Modernized Program. It could also cause confusion on dependency between deliverables. 	<ul style="list-style-type: none"> DEO could define a clear roadmap and timeline of creating the target state architecture and which stakeholders will be responsible for the creation and iteration. 	<ul style="list-style-type: none"> IV&V had several meetings with the SSI vendor and DEO to better understand the situation and plans going forward. It was determined that SSI will adopt an iterative approach to develop the RA Modernization Architecture. This approach will be further developed from a schedule and a detailed process standpoint once the technology vendor onboards. SSI mentioned that Architecture artifacts will be shared once developed. IV&V to observe the agile process in the background and expects to see a clearer process and schedule once the vendor's schedule is implemented. Closing the risk as a result.

In addition to the above-mentioned risks, there are few issues observed in this dimension. See Section 4. Issue Assessment Details.

3.4 Suppliers Management

There are currently no active risks, however, there are few issues observed in this dimension. See Section 4. Issue Assessment Details.

3.5 Financials

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Clarity on financial health of the Program	Program	7/27/2022	Medium	Medium	It is currently difficult to identify and project spend impact when schedules change. The Program lacks transparency regarding month-over-month changes to the Program-wide spend plan. DEO reports that Executive leadership is interested in increased transparency.	<ul style="list-style-type: none"> Until there is a solid understanding of Program-wide and project-specific financial planning, it is difficult to report if the Program has strong financial health, which can lead to over or under spending. There may be a disconnect between cost impact at a project level, which comes from the Project Managers and through the SPO and the insights from the CFO for financial planning decisions, which can lead to inappropriate allocation of funds. 	<ul style="list-style-type: none"> DEO could look to increase transparency and tracking month-over-month and increase the clarity of direction to Project Managers for tracking changes to spend plans as schedules change. 	<ul style="list-style-type: none"> DEO has added a change log to their Spend Plan document and has had several clarifying discussions with IV&V. Finance team and SPO have been improving accuracy of actual expenses by reconciling expenses on a project-by-project level, which improves clarity and transparency. DEO has improved communication to Finance team of expected procurements and expenses, which as improved projected spend estimates. This effort is expected to improve estimates during requests of funds to be released, giving DEO access to appropriate funds as expenses are realized.

3.6 People




Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Resource Requirements for outstanding procurement related projects is unknown	Program	8/26/2022	Medium	Medium	<ul style="list-style-type: none"> It is unclear if the resource requirements for outstanding procurement related projects have been fully defined. Resource planning is awaiting tooling decisions and procurements to gather a better view. 	<ul style="list-style-type: none"> Without adequate resource requirement planning, and with only 10 months remaining, it is difficult to know the true schedules of these impacted projects, thus potentially putting pressure on the 6/30/23 Program end date. 	<ul style="list-style-type: none"> DEO could, on a per project basis, define the resource requirements proactively to reduce risk of delay. 	<ul style="list-style-type: none"> DEO had resource planning sessions in December and concluded that thus far based on the information available, no new positions are necessary for the Technology Tools projects (i.e., CX/UX, SOA/API and Rules Engine). Resources will be finalized once the vendor has been onboarded.
Testing Resource Constraints	Program	9/15/2022	Low	Low	<ul style="list-style-type: none"> Business SME resources, that are needed for testing activities across the Reemployment Assistance Claims and Benefits Information System Modernization Program, could be pulled in other directions such as ongoing operations and other DEO project work. As such, there could be testing resource constraints when required for the Program. As the Program proceeds testing resource contention could increase due to an increase in testing and SME support activities. 	<ul style="list-style-type: none"> Lack of sufficient testing resources could cause teams to compete for talent, causing delays and possible poorly tested components pushed into production. 	<ul style="list-style-type: none"> DEO could look to expand its approach to managing SME capacity by looking at it holistically. Project teams could come up with more formal SME resource requirements that would include skills required, number of testers needed, dates and effort needed from testers. Using this information and similar estimates from other non-Program activities, the team could better manage the SME capacity. Doing this analysis could highlight if there is a shortage of business SMEs and that could be addressed early. 	<ul style="list-style-type: none"> DEO states that SME testing resources have been identified for 5 projects and are completing the remaining resource plans with SMEs dedicated for testing purposes. Like the previous risk, more information regarding quantity and type of SMEs needed for testing will be refined once the Technology Tools vendor onboards.

3.7 Technology and Architecture

Risk Name	Applicability	Date Identified	Previous Risk Rating	Current Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Impact of Limited Data Governance Maturity	Archive & Purge; Master Data Management	10/24/2022	N/A	Low	<ul style="list-style-type: none"> DEO's Data Governance standards and policy are not fully defined. While this should be an agency-wide initiative it is unclear how limited Data Governance maturity would impact data related projects within the RA Modernization Program such as Archive & Purge and MDM that need data driven decision making. 	<ul style="list-style-type: none"> Lack of defined Data Governance standards and decision rights framework within DEO, could lead to missed project benefits around purging and archival of data, and improper creation of data catalog and data dictionary. 	<ul style="list-style-type: none"> While Data Governance should be led at the agency level, DEO could leverage the RA Modernization Program as a means to push the implementation of Data Governance. In the meanwhile, DEO could ensure that data stewards (that have the necessary data-related SME) are at a minimum identified for the in-scope applications for RA Modernization Program's data related projects. 	<ul style="list-style-type: none"> DEO conducted business unit data governance sessions with all 11 business units to identify data stewards and SMEs. Due to a change request, data governance was deemed not necessary, per DEO, since archiving and purging of data has been moved to continuous modernization. IV&V will review the change request and awaits a more formal decision from DEO.

4.0 Issue Assessment Details

This newly introduced section describes risks that have been realized within the Reemployment Assistance Claims and Benefits Information System Modernization Program and are now being managed as an issue. The following information is provided for each issue:

- **Issue Name** – each issue has been named to facilitate easy reference.
- **Applicability** – indicates which projects within the Program the issue applies to, or if the issue is Program-wide. See below Table 2 for more information on the projects that comprise the Reemployment Assistance Claims and Benefits Information System Modernization Program.
- **Assessment Dimension** – indicates the IV&V assessment dimension from the framework mentioned in Table 1 that the issue applies to.
- **Date Identified** – specifies the date the risk was initially identified before it escalated to an issue.
- **Previous Issue Rating** – shows how the issue was rated as of the previous quarterly report.
- **Current Issue Rating** – shows how the issue has been rated currently.
 -  Low issue, minimal impact to Program or project success.
 -  Medium issue, material impact to Program or project success and will require significant attention but may or may not impact the critical path, budget, or scope.
 -  High issue, significant material impact expected to the critical path, budget, or scope.
 - Where DEO has demonstrated it sufficiently addressed or resolved an issue, the issue is marked “closed”. Closed issues will continue to remain in IV&V’s quarterly reports to give the full picture of any issue-related impacts that continue to linger in other areas of the Program.
- **Issue Description** – provides a brief, summary-level description of the issue.
- **Impacts** – describes the impacts to the Program or project because of the issue and the risk being realized. This content focuses on the most significant impacts.
- **Considerations** – provides options for DEO to consider regarding addressing the issue.
- **Actions Taken by DEO** – summarizes key actions taken by DEO to address the issue.

Issue Name	Applicability	Assessment Dimension	Date Identified	Previous Issue Rating	Current Issue Rating	Issue Description	Impacts	Considerations	Actions Taken by DEO
<p>Delay in contract execution for the Systems Integrator</p>	<p>Program</p>	<p>Suppliers Management</p>	<p>1/19/2022</p>	<p>High</p>	<p>High</p>	<p>Given contract execution for the Systems Integrator vendor was delayed by 4 months, this risk has been escalated to an issue. This issue has evolved to multiple other risks and issues that are being tracked separately.</p>	<ul style="list-style-type: none"> Delays in the SSI procurement have impacted and continues to impact dependent projects such as Rules Engine, SOA and API Layer, MDM, and CX/UX as well as those that have a dependency on these projects. The Program has needed to extend timelines or adjust scope to meet objectives. These delays should not impact the ability of the Program to successfully meet its objectives, however, the timeline may need to be extended, or the scope of the Program may need to further change to meet critical Program objectives within the original timeline and secondary objectives being addressed over time via a continuous improvement approach. 	<ul style="list-style-type: none"> DEO could continue to analyze and manage the impact of delays due to onboarding the SSI vendor on the Program and dependent projects. 	<ul style="list-style-type: none"> This issue has realized its impacts on DEO and is currently being monitored in other open risks and issues. Consequently, this issue will remain open until the end of the Program and will be monitored via other open issues.

Issue Name	Applicability	Assessment Dimension	Date Identified	Previous Issue Rating	Current Issue Rating	Issue Description	Impacts	Considerations	Actions Taken by DEO
Rules Engine Procurement Delay	Rules Engine	Suppliers Management	2/8/2022	High	High	The Rules Engine kick off deck highlights a procurement of a Rules Engine product by 2/28. The issue was originally raised as a risk to show a delay in the procurement timeline based on the delayed onboarding of the SSI, who is making the tooling recommendations. The SSI has now been onboarded, but rules engine procurement continues to prolong due to delays in procurement deliverables and in finalization of business rules in scope.	<ul style="list-style-type: none"> Delays in the Rules Engine procurement have impacted the project schedule (i.e., a shift in project end date from July 2022 to June 2023) and could impact any dependent projects. 	<ul style="list-style-type: none"> DEO could continue to manage the impact of delays in procuring Rules Engine on the Program and component projects. DEO could look to speed up the procurement process by faster decisions and by ensuring quality in deliverables that support procurements. 	<ul style="list-style-type: none"> After several delays, the RFQ for the Rules Engine tool was published via the Technology Tools vendor procurement in November 2022. Vendor responses have been reviewed, clarification around scope is being completed and contract negotiations are expected to begin soon. Contract was expected to be completed by December 2022 but is now expected to be awarded in January 2023 after delays. Once the vendor has been chosen, the direction of the Rules Engine project will be clear.
API Procurement Delay	SOA and API Layer	Suppliers Management	3/1/2022	High	High	The SOA and API layer kick off deck highlights a procurement of an API layer product by 3/14. The issue was originally raised as a risk to show a delay in the procurement timeline based on the delayed onboarding of the SSI, who is making the tooling recommendations. The SSI has now been onboarded, but the SOA and API procurement continues to prolong due to delays in procurement deliverables.	<ul style="list-style-type: none"> Delays in the API layer Enterprise Service Bus (ESB) product procurement have impacted the project schedule (i.e., a shift in project end date from July 2022 to June 2023) and could impact any dependent projects. The scope of the SOA/API project is expected to change to fit within the June 2023 timeframe. A formal change request approving the decision is expected next quarter. 	<ul style="list-style-type: none"> DEO could continue to manage the impact of delays in procuring API layer ESB product on the Program and component projects. DEO could look to speed up the procurement process by faster decisions and by ensuring quality in deliverables that support procurements. 	<ul style="list-style-type: none"> After several delays, the RFQ for the SOA/API tool was published via the Technology Tools vendor procurement in November 2022. Vendor responses have been reviewed, clarification around scope is being completed and contract negotiations are expected to begin soon. Contract was expected to be completed by December 2022 but is now expected to be awarded in January 2023 after delays. Once the vendor has been chosen, the direction of the SOA/API project will be clear.

Issue Name	Applicability	Assessment Dimension	Date Identified	Previous Issue Rating	Current Issue Rating	Issue Description	Impacts	Considerations	Actions Taken by DEO
IAM Procurement and Project delays	Identity Mgmt. & Access Control	Suppliers Management	8/30/2022	Previously managed as a high risk	Medium	The project continues to face procurement delays and could impact the IAM project schedule end date of 6/30/23, considering no contingency remaining in the schedule.	<ul style="list-style-type: none"> There is a high likelihood of the procurement delay to have a cascading impact on the remaining procurement activities and the overall project end date of 6/30/23. It could also cause potential scope reduction or lead to unfulfilled project requirements. The vendor could be incentivized to take shortcuts that result in substandard work. 	<ul style="list-style-type: none"> DEO could look to speed up the SOW reviews and identify parallel activity that can be done in other non-dependent project tasks. Additionally, the project could review any contingent time in the remainder of the schedule to adjust for the delays. 	<ul style="list-style-type: none"> An RFQ for an IAM tool was posted and due to lack of responses, DEO has decided to not procure a tool. This decision was formalized via a Program change request. An RFQ to procure a vendor for Management Consulting Services that will update policies and procedures has been posted and is going well. While the procurement is progressing on time the procurement is being monitored via this issue to ensure no further delays. The rating has been lowered to medium.
CX/UX Procurement Delay	CX/UX	Delivery Assurance	9/2/2022	Medium	Medium	The CX/UX tool procurement has been delayed from its initially scheduled date in May 2022. The tooling procurement task continues to be pushed out despite subsequent date updates. The project awaits the completion of SSI's deliverables around architectural standards and tooling recommendation reports that are critical to the CX/UX procurement.	<ul style="list-style-type: none"> CX/UX is a critical piece of the Reemployment Assistance Claims and Benefits Information System Modernization Program. The ongoing procurement delays continue to put pressure on project timelines, quality, and scope. A true impact analysis on the project scope and schedule cannot be completed at the time of writing the report since the CX/UX project schedule is still under DEO review. 	<ul style="list-style-type: none"> DEO could look to speed up the SOW reviews and identify parallel activity that can be done in other non-dependent project tasks. Additionally, the project could review any contingent time in the remainder of the schedule to adjust for the delays. 	<ul style="list-style-type: none"> After several delays, the RFQ for the CX/UX tool was published via the Technology Tools vendor procurement in November 2022. Vendor responses have been reviewed, clarification around scope is being completed, and contract negotiations are expected to begin soon. Contract was expected to be completed by December 2022 but is now expected to be awarded in January 2023 after delays. Once the vendor has been chosen, the direction of the CX/UX project will be clear.

Issue Name	Applicability	Assessment Dimension	Date Identified	Previous Issue Rating	Current Issue Rating	Issue Description	Impacts	Considerations	Actions Taken by DEO
C2C Project Delays	C2C	Delivery Assurance	11/30/2022	Newly raised issue	Medium	CONNECT to Cloud deployment has been delayed due to challenges with TOP tenant server deployment, licensing delays, and database performance issues.	<ul style="list-style-type: none"> Delays in cloud deployment could impact or delay MDM, SSI, and CX/UX. Rushing cloud deployment could result in inferior deployment and result in negative public interactions. 	<ul style="list-style-type: none"> DEO could evaluate resource allocation to ensure that additional time required for C2C project does not overburden resources. DEO could also assess the impact of the C2C delay on interdependent projects. 	<ul style="list-style-type: none"> CONNECT to Cloud deployment was originally planned for an end of December 2022 deployment. But, due to these challenges, has been pushed to a revised deployment date of January 28, 2023 without any impact to other projects. DEO has addressed the performance issues and TOP server security for IRS Pub 1075 requirements is finished. The team is currently working on a server build. DEO has successfully procured Exstream licenses and is in the process of procuring ALM licenses. DEO is systematically addressing these challenges and expects no project delays if ALM licenses are procured by mid-January. IV&V will continue to monitor until cloud deployment in January 2023.
MDM Procurement and Project Delays	MDM	Suppliers Management	8/30/2022	Previously managed as high risk	Closed	Per the project schedule in ServiceNow, the SOW for the MDM tool had to be completed by 8/23 but has been delayed. The current schedule has an end date of 6/30/23, however, it is unclear how these procurement delays could be accommodated with no impact to the project end date.	<ul style="list-style-type: none"> There is a high likelihood of the procurement delay to have a cascading impact on the remaining procurement activities and the overall project end date. The project could see potential scope reduction or sub-standard delivery to still the meet the allotted timeframe. 	<ul style="list-style-type: none"> DEO could look to speed up the SOW reviews and identify parallel activity that can be done in other non-dependent project tasks. Additionally, the project could review any contingent time in the remainder of the schedule to adjust for the delays. 	<ul style="list-style-type: none"> With the Program Strategy change, DEO made the decision to not procure an enterprise-wide MDM tool since it did not meet the original ISF scope and neither was it important to execute the critical path of the Program. Per DEO, the project is still expected to achieve the benefits of defining the data dictionary, data catalog and ensure data de-duplication despite not having a tool. Considering these factors this issue has been mitigated by the change in MDM project's scope and is now closed.

Issue Name	Applicability	Assessment Dimension	Date Identified	Previous Issue Rating	Current Issue Rating	Issue Description	Impacts	Considerations	Actions Taken by DEO
Ongoing SSI deliverable delays	SSI	Delivery Assurance	9/30/2022	Previously managed as medium risk	Closed	The SSI project is facing ongoing delays in its project with incomplete and rejected deliverables by DEO, due to quality issues, such as Deliverable 10 Architectural Standards and Deliverable 16 Tooling Recommendations report. The SSI vendor is developing a new approach that could have downstream impacts on the SSI project.	<ul style="list-style-type: none"> The deliverable delays thus far have prolonged the SSI project schedule and even with the new deliverable methodology and schedule the project end date could push beyond June 30, 2023. SSI delays could impact other dependent projects that await its procurement and architecture related deliverables. Delayed development of architectural standards and to-be architecture state, could cause potential rework or procurement of incompatible tools. 	<ul style="list-style-type: none"> DEO and SSI vendor could look to work collaboratively to finalize the new approach. Significant effort should be made to understand project dependencies. Procurement processes could have to be revisited and redefined considering the revised approach and timelines. 	<ul style="list-style-type: none"> DEO worked with the SSI vendor to change the SSI deliverable schedule. This was done to address the Ongoing SSI Deliverable Delay issue. A contract amendment reset expectations on the deliverable content and adjusted the schedule for the SSI's initial delivery of the deliverables and ongoing deliverable maintenance throughout the project. Now that deliverables are being delivered on time according to the amended contract, this issue is now closed.
SDLC project delays	SDLC	Delivery Assurance	6/9/2022	Was previously managed as risk	Closed	Per the SDLC project schedule in ServiceNow, certain activities are delayed, and the project will not meet its initial proposed close-out date of June 30th. This issue was re-opened as the project didn't meet the updated end date of August 31.	<ul style="list-style-type: none"> This delay has impacted the end date for the SDLC project. 	<ul style="list-style-type: none"> The PM could continue to closely monitor the project schedule and activities in a way that ensure delivery of project objectives within the new approved end date. Additionally, the PM could continue to manage the impact of these delays. 	<ul style="list-style-type: none"> A Change Request has extended the project end date to 31, August 2022. However, since the project didn't meet this date, the risk was escalated to an issue. Another Change Request was approved in September 2022, to adjust the project scope to include automation of Test Execution reports within ServiceNow and, extended the project end date to November 2022. With the approval of the Change Request and adjustment of the project schedule, this issue has been closed.