

**Florida
Child Support Enforcement
Automated Management System
(CAMS)**

**Independent Verification and Validation (IV&V)
Assessment Review Report on the
Planning Phase of the Florida CAMS Project**



**U.S. Department of Health and Human Services
Administration for Children and Families
Office of Child Support Enforcement**

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EXECUTIVE SUMMARY

As a result of submitting a Planning Advanced Planning Document (PAPD) for a total system redesign, the Florida Child Support Enforcement System Automated Management System (CAMS) project became subject to mandatory provisions of 45 CFR 307.15(b)(10). These provisions require an entity independent of the State Title IV-D agency and of the CAMS project management structure to review all technical and managerial aspects of the project.

An Independent Verification and Validation (IV&V) assessment review on the CAMS project planning was conducted by the Federal Office of Child Support Enforcement (OCSE) on September 20-22, 1999. The purpose of this assessment was to determine the extent of IV&V services required on the CAMS project. This report presents the findings of our assessment review.

SUMMARY OF FINDINGS AND RECOMMENDATIONS

IV&V ASSESSMENTS

This assessment is referred to as a *Project Planning IV&V Assessment Review*. The primary purpose of this assessment review is to determine the extent of IV&V services required for the CAMS project's planning phase. The assessment covers only the planning phase because a development alternative for the project has not yet been selected. The secondary purpose of the assessment is to determine the qualifications of the State Technology Review Workgroup (TRW) and its contractors to provide the IV&V services required for CAMS project planning.

A feasibility study, incorporating an analysis of alternatives and cost benefit analysis, will be required to determine the development alternative for the CAMS project. An IV&V review of this study will also be required. OCSE has offered to conduct the IV&V assessment of the CAMS feasibility study if the State requests it.

After the feasibility study has been completed and submitted as part of an Implementation Advance Planning Document (IAPD) for CAMS development, OCSE will conduct another IV&V assessment. This second review, an *Implementation IV&V Assessment Review*, will make recommendations on required IV&V services for the implementation phase. Additional IV&V assessments may be requested by OCSE as deemed necessary.

SCOPE OF REQUIRED IV&V SERVICES

The State must acquire Independent Verification and Validation services for its planning phase through selection of a system model and submission of an IAPD for CAMS development. The IV&V Service Provider who supplies these services must review and make recommendations on

and apply the findings and recommendations of this report in the following areas of the CAMS planning process as more fully described in Section 3 of this report:

- Independent Verification and Validation (IV&V) Services
- IV&V Management Plan
- State Technology Review Workgroup (TRW) as IV&V Provider
- Stakeholder Commitment
- Project Organization
- Project Personnel
- Risk Management
- Reuse and Reengineering
- Quality Assurance

The State must move to begin the identification of requirements for and formulation of a Scope of Work for these services and other ongoing IV&V services for the State's Child Support Enforcement automation project. Though much is unknown at this time regarding the future direction of the project, it is incumbent on the State to begin the acquisition process for these services now to avoid schedule delays. **IV&V services will be required throughout all future system development phases and activities.**

IV&V SERVICES PROVIDER

The acquisition of a planning IV&V Service Provider, either through a formal procurement of contract resources or interagency cooperative agreement, must commence immediately. To assist the State in this regard, this report's recommendations are structured to present specific IV&V tasks that can be included in the Statement of Work for an IV&V Service Provider.

IV&V services may be obtained from other State agencies if they are independent of the Department of Revenue. To that end, ACF interviewed staff from and assessed the contract resources and capabilities of the State of Florida's Technology Review Workgroup (TRW). Based on this assessment, ACF believes that TRW possesses the necessary level of independence and technical resources available to perform most of the IV&V role for the CAMS project. Therefore, the DOR is encouraged to execute an interagency agreement with TRW to provide all necessary IV&V services. A condition of TRW's performance of IV&V services to the CAMS project is that the State must ensure that the contractor (currently identified as Logicon, Inc.) selected by TRW to serve as TRW's IV&V agent does not execute any new contracts with DOR during the course of their performance of IV&V services to the CAMS project. Any such real or perceived violation of this condition, or other potential conflict of interest, by TRW's IV&V contract agent must be timely brought to the attention of this Office for review. Furthermore, contractors who are involved in the preparation of a CAMS project Advance Planning Documents (APD), solicitation "Statements of Work" (SOW) or their respective procurement documents (e.g., Request For Proposal (RFP), Invitation To Bid (ITB), etc.) for any project planning, development or implementation phase activity are ineligible to compete for that work.

PRIOR APPROVAL

The Request for Proposal (RFP) and resultant contract (or similar documents if IV&V is performed by another State agency, such as the Florida TRW) must be submitted to ACF for **prior approval**, regardless of the cost or contractual arrangements. The IV&V services contract or agreement with a State agency must include the names and qualifications of key personnel who will actually perform the IV&V services. **For all IV&V activities, the State must submit an Advanced Planning Document Update (APDU) addressing in sufficient detail the IV&V activities and related costs eligible for Federal financial participation (FFP) at the 66 percent matching rate.**

IV&V DURATION

IV&V must be performed at initial activation of the IV&V Service Provider contract or State agency agreement. Thereafter, the IV&V services must be performed **semi-annually** until such time that the State successfully implements and receives Federal certification of CAMS. Should the State, upon completion of the planning phase, choose not to move forward with a new child support system project, but instead maintain the current automated system, these IV&V services may be terminated after written notification to, and subsequent concurrence by this Office. ACF will periodically reevaluate the IV&V scope of work and frequency requirements of CAMS based upon project progress or when one or more of the IV&V triggers occurs, as described in 45 CFR 307.15(b)(10)(i), such as failure to meet a critical Advanced Planning Document (APD) milestone.

STATE COMMITMENT

State commitment to the CAMS project is essential. The State must ensure that the CAMS project has sufficient resources to implement the IV&V recommendations. In addition, the State should be prepared to fully support development and maintenance of any proposed CAMS system. An operationally successful system, particularly one of the scope of complexity of a statewide child support system, requires a significant commitment of ongoing design, development, implementation and maintenance resources. These resources include not only adequate staffing levels in the appropriate skill sets, but also that of the computing environment (hardware, software and network) as well as the necessary maintenance and operations staffing to manage such an enterprise.

Independent Verification and Validation (IV&V) Assessment Review Report on the Planning Phase of the Florida CAMS Project

1 INTRODUCTION

As a result of submitting a Planning Advanced Planning Document (PAPD) for a total system redesign or new system development, the Florida Child Support Enforcement System Automated Management System (CAMS) project became subject to mandatory provisions of 45 CFR 307.15(b)(10). These provisions require an entity independent of the State Title IV-D agency and of CAMS project management structure to review all technical and managerial aspects of the project.

Consequently, the Administration for Children and Families (ACF), Office of Child Support Enforcement (OCSE) conducted an Independent Verification and Validation (IV&V) assessment review on the CAMS project planning on September 20-22, 1999. The purpose of this assessment was to determine the extent of IV&V services required on the CAMS project. Subsequent to the on-site review OCSE performed additional analysis of the State's documentation and information gathered during the on-site review. This report presents the results of this Office's *Project Planning IV&V Assessment Review* of the CAMS project.

A feasibility study to determine the best system development option for the State is currently being conducted by the Florida Department of Revenue (DOR). The alternatives being analyzed in the study include:

- Transfer of the existing CSE-related software from the FLORIDA mainframe
- Transfer of an existing certified system from another State or Territory
- Development of a totally new, certifiable child support enforcement system
- Maintaining and enhancing the current child support enforcement-component of the FLORIDA system

The feasibility study is intended to determine the most cost effective and efficient system development option for the State. An IV&V review of this study will be required to provide OCSE and the State assurance that the methodology used to conduct the feasibility study for the CAMS project was objective, measurable, repeatable and verifiable. This review will necessarily concentrate on the verification and validation of the feasibility study's documentation and processes used to perform this analysis. A work product of the review will be the creation of supplemental information useful for inclusion in any subsequent CAMS project Implementation Advance Planning Document (IAPD). OCSE will, at the request of the State, perform the IV&V review of the Feasibility Study.

After the feasibility study has been completed and an IAPD submitted, OCSE will conduct another IV&V assessment review. This second review, an *Implementation IV&V Assessment Review*, will make recommendations on required IV&V services for the implementation phase. Additional IV&V assessments may be requested by OCSE as deemed necessary.

1.1 BACKGROUND

The State of Florida currently operates a Federally certified, comprehensive and statewide automated child support enforcement system called FLORIDA. The FLORIDA system is an integrated system encompassing numerous health and human services components representing such Federally funded programs as Medicaid, Foster Care, Food Stamps, Temporary Assistance to Needy Families and Child Support Enforcement. This integrated system, including its child support component, is operated and maintained by the State's Department of Children and Families (DCF). The Title IV-D (child support) program, however, is located in the State's Department of Revenue (DOR). The DCF maintains the FLORIDA system through a blend of contracted application development, maintenance and operations resources, and State staff. DOR exercises management and operational control of the child support component of the FLORIDA system through an interagency cooperative agreement with the DCF.

As a result of ACF's request for an IV&V assessment review, a site visit was conducted on September 20-22, 1999 at the offices of the Florida Department of Revenue (DOR) in Tallahassee, Florida to determine the scope of IV&V services required on the CAMS project. The Federal assessment team consisted of:

Edward Morris	ACF/OCSE/DCSIS
Joe Bodmer	ACF/OCSE/DCSIS
Tom Mahony	Marconi System Technologies

The following State of Florida DOR and TRW personnel and contractors also participated in the execution of the assessment review:

Jim Zingale	DOR Assistant Executive Director
Lillie Bogan	DOR/CSE Program Director
Hal Bankirer	DOR/CSE Deputy Program Director
Pam Witzleben	DOR/CSE CAMS Program Manager
Joe Sisson	DOR/CSE CAMS Deputy Program Manager
Barbara Philips	DOR/Administrative Services Program
Karen Stolting	Office of Planning and Budget/Technology Review Workgroup
Colleen Birch	Office of Planning and Budget/Technology Review Workgroup
Edward Addy	Logicon Inc.

1.2 Methodology

The review team conducted discussions with Pam Witzleben and Joe Sisson on current project organization, management, funding, personnel, and executive oversight. The team met with members of the CAMS' Project Board (Lillie Bogan, Jim Zingale, and Hal Bankirer) to discuss Federal IV&V requirements and the purpose and goals of the IV&V assessment. The team also met with representatives of the State's Office of Planning and Budget (OPB) Technology Review Workgroup (TRW) and its contractor to evaluate that organization (TRW) as a potential IV&V Service Provider. The team also discussed procurement issues with Barbara Philips of the DOR Administrative Services Program (ASP).

CAMS and TRW documentation was collected and examined. The documents examined are detailed in Table 1: CAMS Documents Reviewed.

Table 1. CAMS DOCUMENTS REVIEWED

Document	Date	Author
Planning Advanced Planning Document	Revised August 1999	DOR/CSE
Survey for Information Consulting Services	September 28, 1998	OPB/TRW
Employee Handbook (Organization Chart)		DOR
Feasibility Study for the Child Support Enforcement Program	December 21, 1998	TRW Inc.
Florida Statutes, Title XIX, Chapter 282	September 16, 1999	State of Florida
Special Project Monitoring Report Preparation & Review Process		OPB/TRW
Florida CSE Feasibility Study	August 11, 1998	TRW inc.
Statement of Work	September 16, 1999	DOR
Guidelines for Preparing the Feasibility Study for Information Technology Projects	June 1999	OPB/TRW
Potential Organizational Conflict of interest (OCI) Mitigation Plan	October 12, 1999	Logicon
Multiple Contracts Between Grumman Data Systems/Logicon and DOR	October 21, 1999	DOR

2 FINDINGS

The findings in this report are based on the discussions held with State staff during the onsite portion of the assessment review, September 20 through 22, 1999, and upon the subsequent review of the planning project's documentation. Our findings are based on areas of the CAMS project planning effort that require oversight by an IV&V provider.

2.1 STAKEHOLDER COMMITMENT

Florida's CAMS planning project is currently in an initiation phase. During the onsite review Florida's DOR management expressed strong support for the project. However, high-level State support (executive and legislative) and as a result, committed project funding is not yet in place for this project. The State has an existing, certified child support system that is part of the Florida On-line Recipient Integrated Data Access (FLORIDA) system. There is, as yet, no legislative appropriation for CAMS system development.

It is unclear from the PAPD how stakeholders are involved in this project. Stakeholders are not on the executive committee. They are included in the organizational chart, but their role in planning and development is not described. Stakeholders to the project, particularly system users, should represent highly visible and proactively involved information gathering and decision making resources. Any resultant CAMS system must inherently serve the needs of stakeholders to be effective. However, at this time, the involvement of potential CAMS stakeholders, beyond that of DOR management, is nebulous.

2.2 PROJECT ORGANIZATION

DOR's proposed management structure for the CAMS planning project does not have clear lines of reporting and authority. For example, it is not clear who on the Project Board has the final authority to allocate resources to the project. The Department Representative, the Customer Representative, and the Technical Representative are all described as having resource allocation authority. However, the Program Sponsor does not. This despite the fact that this position has the authority to cancel the project. If there is a conflict over resources it is not clear who is ultimately empowered to resolve it. There is an Information Services Process (ISP) representative on the project board, though it is unclear if any ISP resources will be required for the CAMS project.

Though the FLORIDA system must undergo concurrent development to meet federal PRWORA deadlines, the current CAMS organization, as described, does not seem closely related to the FLORIDA project. A FLORIDA system liaison does report to the Program Sponsor, but the involvement of FLORIDA personnel in CAMS should be made more explicit organizationally.

2.3 PROJECT PERSONNEL

There are three full-time State personnel on the CAMS project. The program managers are highly motivated and have extensive management experience and expertise in the Learmonth and Burchett Management Systems (LBMS) methodology currently being used in the project. There are, however, an insufficient number of State personnel currently assigned to project to provide the contractor oversight and managerial analysis required for this project.

The PAPD states that 10-15 additional State personnel representing both technical and business interests will be assigned to the project. There is no staffing plan that describes how these personnel resources are to be obtained, although it is expected that some personnel will be available from the FLORIDA project. It is unclear from current project planning documentation as to how and by whom conflicting staffing requirements between CAMS, FLORIDA, ISP and the rest of DOR will be resolved.

2.4 RISK MANAGEMENT

There is no risk management plan or formal risk management methodology described in the PAPD, even though there may be substantial schedule and funding risk associated with the project. The Statement of Work calls for a contractor to perform risk management, but does not prescribe a risk management methodology. The TRW requirements for *Information System Budget Requests* define a methodology for a one-time risk assessment study, but it is not clear if this methodology is intended to be used for CAMS project planning **and** development, nor is it clear that this methodology is sufficient for continuous risk management. The LBMS methodology also requires some risk analysis for at least some aspects of the planning process. However, it is unclear from the documentation whether this level of risk analysis will be sufficient for the project as a whole.

2.5 REENGINEERING AND REUSE

The project currently has no plans for a reengineering and reuse study of FLORIDA. The parts, if any, of the FLORIDA system that can be reused or cost-effectively reengineered for CAMS (requirements documents, design documents, algorithms, code, test plans, training material, etc.) have not been identified. The Feasibility Study may accomplish some of this analysis. However, unless specifically addressed, it is unlikely that the feasibility study's analysis of alternatives will be at a level of detail sufficient for project planning.

2.6 QUALITY ASSURANCE

Although the CAMS Planning Phase Resources chart in the Planning Advance Planning Document (PAPD) calls for a contracted Quality Assurance Analyst for the project, and although reviews of each product are scheduled, there is no detailed description of the role of Quality Assurance in the project. It is also unclear from the planning phase documentation that the resources dedicated to quality assurance are indeed sufficient.

3 RECOMMENDATIONS

The following IV&V Assessment Review recommendations are based upon interviews conducted during the visit to the project site and upon the analyses conducted of the State's CAMS project documentation subsequent to the onsite portion of the review.

3.1 INDEPENDENT VERIFICATION AND VALIDATION (IV&V) SERVICES

The State must acquire Independent Verification and Validation services in accordance with 45 CFR 307.15(b)(10). These services can be obtained from a contractor via a Request for Proposal (RFP) or from an independent State agency (such as TRW). If a contractor is used, the RFP and contract must be submitted to ACF for prior approval, regardless of the cost or thresholds. The contract must include the names, experience, and skills of key personnel who will actually perform the IV&V analyses. If IV&V is performed by another State agency, similar, equivalent documentation must be submitted, usually taking the form of a detailed Interagency Cooperative Agreement that incorporates a detailed Statement of Work, Schedule, List of Deliverables, and Budget. **The State must then submit an Advance Planning Document Update (APDU) describing in sufficient detail the prescribed IV&V activities, work products, and costs eligible for 66% Federal financial participation (FFP).**

The IV&V services agreement (or contract) should describe the level of IV&V services to be provided. At a minimum, the agreement (or contract) must consist of an initial review at contract (or State agency agreement) activation and semi-annual reviews thereafter to monitor the overall status and management of the project's planning and development efforts. Many of the aspects of this level of IV&V services are briefly described below, and will be further defined by the State and its IV&V Service Provider. **The IV&V Service Provider must supply all plans, and reports of findings and recommendations to ACF Central and Regional Offices at the same time that they are supplied to the State (including draft documents submitted for comment), as specified in 45 CFR 307.15(b)(10)(ii).**

INITIAL AND SEMI-ANNUAL IV&V REVIEWS

An initial (at contract or State agency agreement activation) and semi-annual IV&V reviews shall be required to ensure the project is on schedule and requirements are being met for Federal certification. The frequency and task level of these reviews will be defined in the IV&V Management Plan. The recommendations in Section 3.4 Stakeholder Commitment through Section 3.9 Quality Assurance apply to both the initial and periodic reviews.

The following areas are recommended as general scope of work considerations for any IV&V Service Provider to the CAMS project, and should be included as tasks in any IV&V procurement vehicle and contract/agreement.

- a) Analyze project management, evaluate project progress, resources, budget, schedules, work flow and reporting.
- b) Review and analyze project management planning documents.
- c) Review and analyze project software development documents.
- d) Review and analyze processes to ensure they are being documented, carried out, and analyzed for improvement.
- e) Assess the project's CM function/organization by reviewing its reports and making recommendations regarding appropriate processes and tools to manage system changes.
- f) Perform a detailed review of the system documentation (Requirements, Design, Training, Test, Management Plans, etc.) for accuracy and completeness.
- g) Review the traceability of system requirements to design, code, test, and training.
- h) Assess and recommend improvement, as needed, to assure software testing is being performed adequately through review of test plans or other documentation and through direct observation of testing where appropriate, including participation in and coordination of peer reviews.
- i) Report on the State's efforts to address the findings and recommendations from this IV&V Assessment Review Report.
- j) Assess and recommend improvement, as needed, to assure appropriate user and developer training is planned and carried out.
- k) Review system hardware and software configuration and report on any compatibility and obsolescence issues.

FULL TECHNICAL IV&V REVIEWS

The following areas are not currently required of the CAMS project as part of the initial and ongoing semi-annual IV&V reviews of the project's planning and system development phases. However, with regard to these activities described as part of "Full Technical Reviews" within the IV&V process, the State is advised to select an IV&V Service Provider with the appropriate technical skill sets and availability of resources to support such reviews should they become necessary as a result of significant findings identified during OCSE's future *Implementation IV&V Assessment Review* or as part of the CAMS project's ongoing, semi-annual IV&V reviews.

OCSE will provide follow-up guidance to address all of these areas in its *Implementation IV&V Assessment Review*. These reviews may also be initiated by the State to give it assurance that the project's code base, documentation, etc., is in good shape and to identify and address any

problems before they become unmanageable. OCSE will address all these areas further in the *Implementation IV&V Assessment Review*. Full technical IV&V reviews may include, but not be limited to the following areas of review for remediation and elimination of deficiencies:

- a) Perform a detailed review of the system documentation (Requirements, Design, Training, Test, Management Plans, etc.) for accuracy and completeness.
- b) Perform a detailed review of the software architecture for feasibility, consistency, and adherence to industry standards.
- c) Inventory and review the application software for completeness and adherence to programming standards for the project.
- d) Assess and recommend improvement, as needed, to assure maintenance of a data center, including data center input to the project regarding operational and maintenance performance of the application.
- e) Review and analyze system capacity studies.
- f) Analyze application, network, hardware and software operating platform performance characteristics relative to expected/anticipated/contractually guaranteed results and industry standards/expectations.

3.2 IV&V MANAGEMENT PLAN

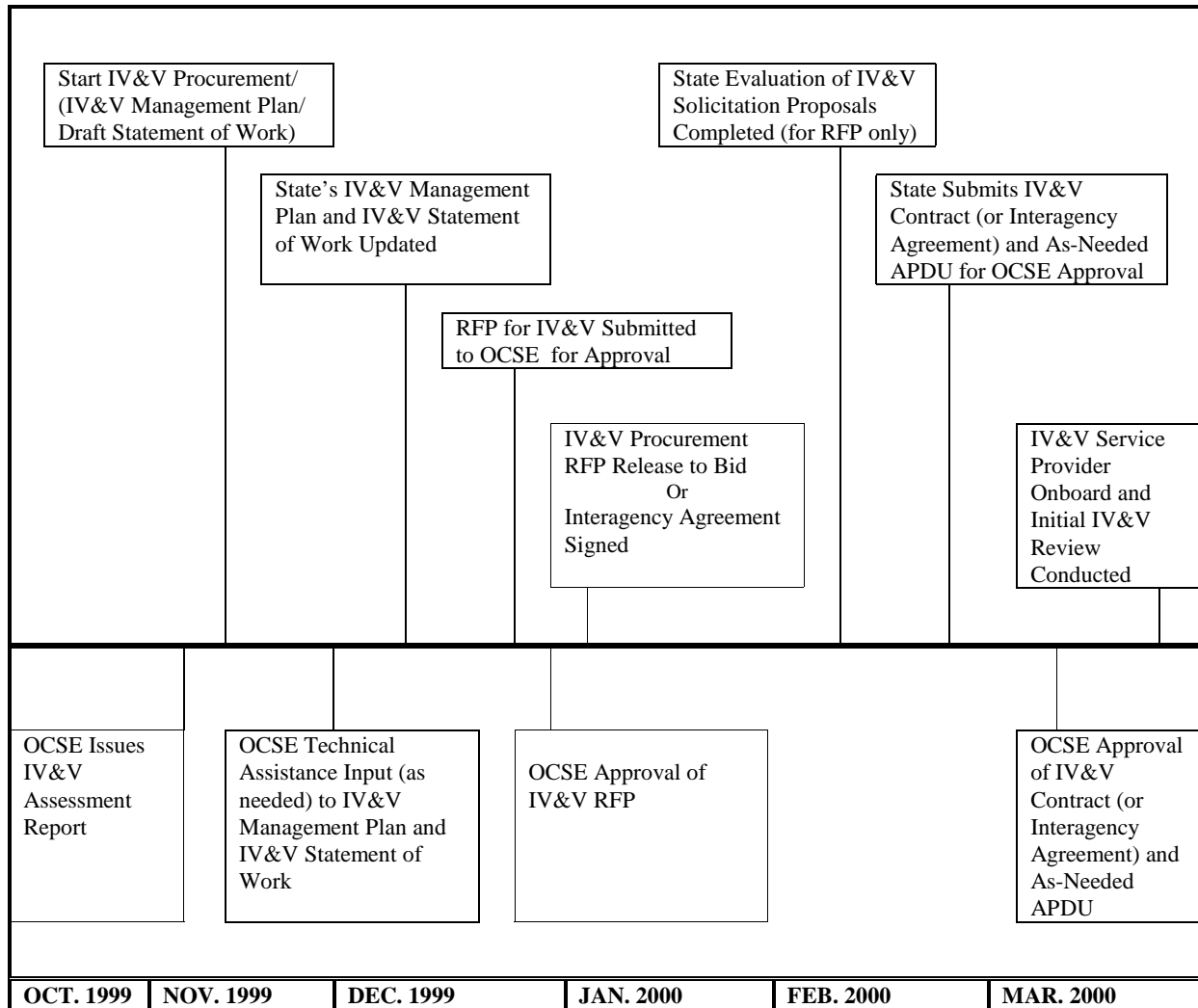
Many of the recommendations contained in this report are presented to the State in the form of general requirements for the State to incorporate into what this report refers to as an “IV&V Management Plan”.¹ These recommendations are intended to assist the State in creating and refining an acquisition/procurement document's Scope of Work for the eventual solicitation of an IV&V Service Provider. If the IV&V Service Provider is to be a State agency (as has been proposed), the IV&V Management Plan, incorporating these recommendations, will be jointly constructed as part of an Interagency Cooperative Agreement defining the roles and responsibilities between the Title IV-D agency and the State agency serving as the IV&V Service Provider. OCSE is committed to providing technical assistance in the form of documentation review and recommendations, as needed, to assist the State in the development of its Interagency Cooperative Agreement or Statement of Work for the acquisition of the IV&V Service Provider.

Table 2. Estimated Critical Milestones Schedule in CAMS IV&V Procurement presents an estimated timeline representing what we believe represents an appropriate order for the major milestones in the CAMS Planning phase, from IV&V procurement and IV&V Management Plan creation, to the issuance of this report through, to the IV&V Service Provider being brought

¹ The need for an IV&V Management Plan, beyond its use as a basis for a Scope of Work for an IV&V Service Provider (whether contract or State agency) is as a detailed plan of action for periodic independent reviews of the CAMS project's critical development and implementation phase milestones and deliverables. In addition, it serves as vital documentation to the State's required update to its Planning and Implementation Advance Planning Document Updates for the project.

onboard, and finally to completion of the Initial CAMS IV&V Review. The State should use this estimated timeline as guidance in the development of its initial IV&V Management Plan, and incorporate it to future updates to the State's Planning and Implementation APDU. The IV&V Management Plan should be reviewed and updated once the IV&V Service Provider is selected and onboard. This revised and finalized IV&V Management Plan should be one of the first IV&V Service Provider deliverables and should reflect any schedule changes consistent with the IV&V Service Provider's detailed Technical Proposal to the State's IV&V solicitation document (whether DOR or TRW's). ACF will periodically reevaluate the IV&V scope of work and frequency requirements of the CAMS project based upon project progress or when one or more of the IV&V triggers occurs, as described in 45 CFR 307.15(b)(10)(i), such as failure to meet a critical Advanced Planning Document (APD) milestone.

Table 2. Estimated Critical Milestones Schedule in CAMS IV&V Procurement



3.3 STATE TECHNOLOGY REVIEW WORKGROUP (TRW) AS IV&V PROVIDER

ACF believes that Technology Review Workgroup possesses the necessary, and legislatively prescribed level of independence, as well as the appropriate contract technical resources available to perform all or most of the IV&V role for CAMS. As part of OCSE's IV&V assessment, we analyzed TRW's potential as the CAMS IV&V Service Provider, and by extension, TRW's use of Logicon as a subcontractor for technical resources. Of concern, after eliminating technical capacity as an issue, were potential issues surrounding conflicts of interest between Logicon and DOR's CAMS project. Specifically, potential conflicts of interest, either real or perceived, appeared to exist in that Logicon had ongoing contractual relationships with the DOR. Such relationships, if significant, could present difficulties to the contractor's performance as an **independent** IV&V Service Provider. After careful review and consideration, we have determined that Logicon's contractual relationships with the DOR do not, at this time, pose a serious risk to the effective execution of its potential role as IV&V Service Provider to CAMS.

To ensure the independence of TRW, and its subcontractor Logicon, the following conditions are placed on the use of Logicon (or any other contract agent providing IV&V services to the CAMS project):

- The TRW must maintain proactive management and supervisory control over the work activities and deliverables of Logicon or any successor contractor.
- ACF/OCSE must be immediately apprised by DOR of any increase in current participation, either as a prime or sub-contractor, or any new participation/solicitation of contractual work with the DOR (this restriction extends to all DOR operational divisions.)
- OCSE may, at any time, reevaluate these conditions in order to strengthen or modify their application, including requiring the dismissal of any sub-contractor to TRW as a member of the CAMS IV&V Service Provider team. Adherence to these conditions on the use of TRW (and its agents and assigns) as the CAMS IV&V Service Provider is a condition of continued Federal approval of the CAMS project and of its Federal financial participation (FFP). The availability of qualified, capable IV&V resources that can present unbiased positions with regard to their role as the CAMS IV&V Service Provider is of paramount importance.
- Any contractor serving as the sub-contractor to TRW in the role of CAMS IV&V Service Provider must be prohibited from soliciting, proposing or being awarded any project management, quality assurance, software design, development or other manner of implementation phase work on the CAMS project in accordance with Federal regulations at 45 CFR Part 74.43 Competition requiring, "... the maximum extent practical, open and free competition ..." and requiring that the State be, "... alert to organizational conflict of interest as well as non-competitive practices among contractors that may restrict or eliminate competition or otherwise restrain trade." This includes contractors who are involved in, prepare, advise on, or have access to the creation and/or preparation of a Statement of Work (SOW) or Request for

Proposal (RFP) or other solicitation vehicle. This also includes those intimately involved with the State staff responsible for such solicitation preparations.

3.4 STAKEHOLDER COMMITMENT

High-level State commitment to the CAMS project is essential. The State must ensure that the CAMS project has sufficient resources to implement the IV&V recommendations. In addition, the State should be prepared to fully support development and maintenance of CAMS system. An operationally successful system, particularly one of the scope of complexity of a statewide child support system, requires a significant commitment of ongoing maintenance resources. The IV&V provider will recommend steps to be taken to ensure sufficient State support is obtained.

The IV&V provider must evaluate Stakeholder commitment to this project. The IV&V provider must ensure that all stakeholders have buy-in and commitment to the project, and that open pathways of communication exist among all stakeholder and project management.

The IV&V provider will periodically assess the State, user, management, and organizational involvement and commitment to the project. Such buy-in and communication will be a critical factor throughout the planning, development and implementation phases of the project. This specific IV&V task will give Federal and State leadership the ongoing assurance that strong commitment to the project persists among all stakeholders.

3.5 PROJECT ORGANIZATION

The IV&V provider will make recommendations on organizational management structure that would be most effective to minimize redundancy and effectively manage personnel resources. The CAMS IV&V Management Plan must provide recommendations to the State regarding project organizational structure and reporting. These recommendations must include well-executed definitions for technical and managerial oversight responsibilities and authorities within the project.

The organizational structure must define such areas as: project planning, risk management, software development, training, quality assurance, configuration management, testing, documentation and reporting, and such other functions as may be deemed critical to the projects' overall success. Upon review and acceptance of these organizational recommendations by the State, the project organization plans and charts must be incorporated to the State's APD Update.

The IV&V provider will periodically assess the overall effectiveness of the project's organization and make recommendations for improvement.

3.6 PROJECT PERSONNEL

The success of the CAMS project depends on having sufficient qualified technical personnel to oversee project planning and manage vendors. Therefore, **current project staffing must be appropriately augmented and subsequently maintained to ensure timely completion of the project.**

For the immediate project planning phase of CAMS, the IV&V provider must identify appropriate numbers of State personnel, by experience level, necessary to appropriately manage and coordinate the project. The IV&V Service Provider must ensure that a staffing plan for the project is created. The plan should provide a methodology for personnel requirements estimation and address, within the constraints of State budget and hiring policies, both the acquisition and retention of experienced project personnel.

The IV&V Service Provider must ensure the project has a clearly defined vendor procurement and acquisition schedule to supplement project staffing. This vendor schedule must also include an analysis and recommendation as to the appropriate scope or work, service levels, and schedule of procurement and deliverables. Of additional importance is that although vendor staff will be brought onboard to plan the project, the IV&V provider must ensure that day-to-day direction of the project rests squarely with State personnel

The IV&V provider must periodically review CAMS staffing to ensure that the appropriate State and contractor personnel, both in terms of quantity and skill sets, are adequately defined and acquired throughout the course of the project's development and implementation lifecycle. The review should anticipate any potential fluctuations in staffing requirements by project phase, relative to various lifecycle factors, such as alterations in schedule, milestones, and deliverables.

The IV&V provider must also periodically review and provide opinion on the State's adherence to Federal procurement regulations and policies regarding contracting and Federal financial participation. Specific attention must be focused on the efficacy of the State's procurement vehicles, procedures and adherence to Federal prior approval requirements as defined in applicable Federal regulations at 45 CFR Parts 74, 95 and 307.

3.7 RISK MANAGEMENT

The IV&V vendor will ensure that a comprehensive and consistent risk management plan is developed for the project and, if necessary, recommend improvements or alternative methodologies. The risk management plan should identify, categorize and mitigate both technical and non-technical risks. The IV&V provider will ensure that the risk management methodology employed by CAMS is proactive, provides for periodic risk reviews, provides estimation of program impact, and ensures reporting to the appropriate level of CAMS management.

The IV&V provider will periodically assess the project's risk management plan and make recommendations regarding organization, processes, policies, and overall effectiveness of the plan to identify, analyze, and mitigate potential project risks.

3.8 REENGINEERING AND REUSE

The planning IV&V provider will evaluate the need for a reengineering study of FLORIDA, based on the contents of the Feasibility Study. The goal of the study will be to determine what FLORIDA products, including system requirements documents, design documents, algorithms, code, test plans, training material, etc. are candidates for reengineering and reuse. The planning IV&V provider will make recommendations on what portions of the FLORIDA system should be evaluated in the study, what qualities should be evaluated (CAMS requirements match, modularity, complexity, maintainability, portability, completeness of documentation, etc.), how the technical evaluation will be done, and how costs (reuse vs. new development) will be estimated. Reengineering may include reverse engineering, code translation, module wrapping, re-documentation, restructuring, re-targeting, or any other process that will lead to cost-effective reuse. The planning phase IV&V Service Provider will recommend analysis techniques and tools for this evaluation.

The IV&V Service Provider will periodically assess the project's progress in reengineering and reuse and make recommendations for improvement.

3.9 QUALITY ASSURANCE

The IV&V provider will assist in the development of a Quality Assurance (QA) plan for the CAMS project. The IV&V provider will ensure that the QA Service Provider define, provide and support a thorough QA methodology. The IV&V provider will ensure that the QA organization exists independently from other functional areas of the project's organization, and that ultimately the QA provider must report to the State's software project manager. The IV&V provider will ensure that performance metrics are developed, which allow tracking of project completion against milestones set by the State.

The IV&V provider will periodically assess the QA function and its adherence to the prescribed standards and methodologies, as well as the efficacy of its approach. The IV&V provider will monitor the performance of the QA function/organization by reviewing its reports and performing spot checks of system documentation. The IV&V provider will ensure the defined QA/QC processes are followed, product quality is measured, and processes are continuously being improved to support increased product quality.