Prepared for

Florida Department of Economic Opportunity

January 2022 Quarterly IV&V Assessment Report

For period beginning October 1, 2021, and ending December 31, 2021

FINAL VERSION

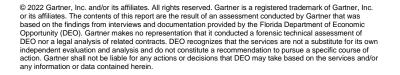




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1.0 Introduction

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 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 recognizes 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. ³Additionally, this Program sets the foundation for continuous ongoing modernization for further improvements beyond the conclusion of the initial two-year effort.

The purpose of this quarterly report 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 Reemployment Assistance Claims and Benefits Information System Modernization Program. IV&V services provide independent third-party monitoring focused on identifying and assessing risks which may impact the success of a program, and providing recommendations, or considerations, on how to mitigate and/or prevent risks moving forward.

At the outset of the engagement, DEO established the following IV&V guidelines:

- 1. DEO will identify specific program and project meetings to 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 capture considerations to mitigate identified risks. This information will be provided to the DEO Steering Committee.
- 3. DEO will provide documentation and artifacts, including solicitations, it deems relevant for IV&V review. Documentation and artifacts will generally be penultimate or final drafts.
- 4. New IV&V risk-related observations should not automatically be added to, and tracked, using the risk register. Instead, such observations should be tracked separately and discussed with the DEO Steering Committee to gain greater clarity. Observations may be elevated to risks and conversely risks may be de-escalated to observations.

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

5. The ISF Report recommended 15 baseline projects comprising the Reemployment Assistance Claims and Benefits Information System Modernization Program known as "program framework" which served as the baseline for enhancement and modernization and thereby the program boundaries for the IV&V. Any current state analysis or review of the foundational source code of the CONNECT Reemployment Assistance Claims and Benefits Information System is out of scope for the IV&V engagement.

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 assessment categories used to assess the Reemployment Assistance Claims and Benefits Information System Modernization Program.

Table 1. IV&V Risk Assessment Dimensions and Categories

Risk Assessment Dimension	Risk Assessment Categories	
Strategy and Business Value	Business Strategy Alignment	Benefits Realization
Governance	Executive SupportProgram TrackingCommunication and Collaboration	Program OrganizationRisk and Issue Management
Delivery Assurance	Scope ManagementQuality AssurancePost Release Support	Software Development LifecycleMitigation and Release Strategy
Suppliers Management	Sourcing Strategy and ContractsSuppliers Knowledge Transfer	Supplier Performance
Financials	Financial BaselineFinancial Tracking	Change Requests Estimation
People	Program Organization StaffingTraining	Organizational Change Management
Technology and Architecture	Architecture and Design Architecture Quality	Architecture and Technical GovernanceData Management

2.0 Risk Assessment Summary

This quarterly assessment covers the reporting period beginning October 1, 2021, and ending December 31, 2021. Figure 1 summarizes the level of risk determined across the seven assessment dimensions described in Table 1.

Figure 1. Reemployment Modernization Program Risk Heat Map



- Low risk, minimal impact from 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.

At present, there are five low risk dimensions where no major risk concerns were found:

- Strategy and Business Value A Program Strategy based on the February 2021 ISF Assessment Roadmap is in place. A benefits realization strategy with defined metrics to track progress in achieving business value is not currently in place.
- **Delivery Assurance** With the onboarding of the Strategic Planning Office (SPO) vendor, DEO has instituted core project management practices, including project documentation creation in line with 60GG standards. Processes to create and maintain technical documentation have been defined but are not yet implemented.
- **Suppliers Management** No major risks were identified in the Business Process Optimization (BPO) and System and Software Integration (SSI) RFQs provided for review. DEO should consider monitoring the SSI RFQ and SSI's contract in line with the Program's ongoing effort of re-baselining the schedule.
- Financials Initial review of DEO's monthly spend plans and Program/Project Expenditure tracking artifacts yielded no immediate concerns. Financials will require regular monitoring and review as key information arrives, such as SSI solicitation vendor responses.
- **Technology and Architecture** DEO has created a target architecture for the Reemployment Assistance Claims and Benefits Information System. DEO expects an increase in architectural staffing capacity with the onboarding of the SSI in January 2022.

There is one medium risk dimension, where material impact to the Program is possible if risks are realized, but would not necessarily derail the overall implementation plan:

• Governance – While DEO has started governance-related activities, such as establishing project standards and holding governance status meetings, governance is not planned to be completely defined, formalized, and launched until the SPO's Program Management Plan, currently under development, is completed and accepted by DEO. Leading practice suggests governance to be fully established at this point in the program life cycle, especially for programs with a complex scope and aggressive but achievable timetable like the Reemployment Assistance Claims and Benefits Information System Modernization Program. However, the Program is in an early enough stage that limited formal governance is manageable in the interim assuming the implementation of full governance is employed on the currently planned timeframe.

There is one high risk dimension, where significant material impact to the Program's critical path schedule, budget, and/or scope would be expected if these risks are realized:

- People The Program initially and continuously experiences resourcing challenges staffing the currently 25¹ open roles with either qualified full-time employees, staff augmentation, or a combination. COVID-related disruptions are a key driver of these challenges, namely higher turnover with existing DEO staff, the accompanying loss of DEO experience and institutional knowledge, and increased labor market competitiveness making it more difficult to recruit qualified individuals into open roles.
 - Limited staff availability has impacted the Program, including delayed execution of initial program mobilization activities.
 - The onboarding of the Strategic Planning Office (SPO) vendor and their project management staff resources in December 2021, while unable to reduce overall risk on their own, has had a positive impact increasing the project management capacity of the Program. For example, the SPO staff have taken on activities not previously resourced, such as establishing structure around project management activities for active projects within the Program.
 - Resourcing to perform delivery work on projects and technology implementation remains a significant risk factor. DEO plans to address this through the SSI procurement and staff augmentation contracts. DEO has reported that:
 - The Department continues to seek specialized IT talent through staff augmentation efforts and through procurements that require vendors to supply necessary talent. While the Department has seen some success from diverse talent acquisition methods, it continues to compete with global demand for these specialized skill sets.
 - High demand in this industry has led to the inability to maintain or increase staffing levels due to more lucrative or flexible employment opportunities, or an opportunity to work with newer technology.
 - High demand in this industry has also resulted in IT staffing agencies sending a similarly skilled individual to report to work, after the Department has extended an offer to another individual.
 - Considering the aggressive, but achievable, two-year program implementation timeframe, continued uncertainty in the labor market, and uncertainty regarding potential further COVID-related disruptions, managing people-related risks will require special attention and monitoring by DEO for the foreseeable future, even after fully staffing the Program.

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¹ Per Hiring Metrics data provided by DEO dated 12.29.21

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 below Table 2 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.
- Risk Rating shows how the risk has been rated. 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 it was necessary to reopen the risk.
- 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.

As indicated above, where risks are not Program-wide, the specific set of projects a risk applies to is indicated. DEO has identified the set of projects that comprise the Program. While some projects began earlier (such as Data Warehousing and Identity and Access Management for claimants), the Reemployment Assistance Claims and Benefits Information System Modernization Program mainly began in the summer of 2021. DEO adopted the February 2021 ISF Report and its Roadmap as the baseline strategy for the Reemployment Assistance Claims and Benefits Information System Modernization Program. The first months of the Program were focused on traditional program mobilization activities such as program governance, resourcing certain Program roles, stakeholder management, and communications.

The Reemployment Assistance Claims and Benefits Information System Modernization Program is comprised of 15 projects (not including procurements listed as projects in the ISF report), eight of which "Active". 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 2below 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, 2021

Project Category	Project Name	Project Status
Infrastructure	Cloud Migration (CONNECT to Cloud)	In Progress
	Cloud Application Performance Management	Not Started
Software	Software Development Lifecycle (SDLC)	In Progress
	.NET and ORM Upgrade	In Progress
	SOA and API Layer	Not Started
	Rules Engine	Not Started
	CX/UX Mobile Responsive Software Transformation	Not Started
	RA Help Center	Deployed into Production, Completing Project Closure Activities
Data and Analytics	Data Warehouse	Deployed into Production, Completing Project Closure Activities
	Reporting	In Progress
	Archival and Purge	Not Started
	Master Data Management and Interoperability	Not Started
Security	Security Architecture Review Services	In Progress
	Identity Management & Access Control	Phase 1 Completed, Remaining Phases Not Started
	Security Architecture Audit Services	Not Started

3.1 Strategy and Business Value

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Informal Benefits Realization Approach	Program	10/26/2021	Medium	A formalized benefits realization strategy and plan with clear metrics and a progress towards target benefits tracking approach is not yet in place.	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.	 Develop a benefits realization strategy and management process, including: 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. 	DEO is working on developing a benefits realization strategy and plans to keep IV&V informed on progress and to provide documentation.
Dependency on Decisions Made for Enterprise- wide IAM (Identify and Access Management) Initiative	Identity Management and Access Control	10/27/2021	Low	Interviews with DEO stakeholders highlighted there is an ongoing discussion on IAM fraud detection technology across the enterprise, beyond the Program.	 While this conversation is still in early stages, any future direction at the enterprise level could impact the IAM project for the Program. The risk of a technology issue is minimal. However, there could be potential changes in processes, policies, and governance that could cause rework. 	 DEO could define the strategy for enterprise IAM to track alignment with the current initiative. Ensure DEO leadership and Architecture teams are closely involved in the enterprise wide IAM decisions. 	 DEO initiated several identity management and access control initiatives ahead of the scheduled start date for the IAM project. DEO has work in progress for an enterprise-wide identity management and access control initiative; due to the unique nature and needs of each programmatic area within DEO, these enterprise-wide efforts are not considered a risk to the Reemployment Benefits System Modernization Program. DEO to continue to monitor the risk.

3.2 Governance

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Program Governance Structure	Program	9/21/2021	Medium	There isn't a formal program governance structure in place that clearly defines the roles and responsibilities for DEO-business, DEO-IT, and vendor stakeholders with a clear RACI model ¹ for various program decisions.	Inadequate governance, caused by poor engagement from business and IT stakeholders and unclear decision rights, is one of the leading causes for numerous large and complex government projects to fail.	Program governance could be formally structured with clear roles and responsibilities, RACIs and regular touch points with senior business and IT DEO stakeholders to encourage timely information sharing and decision making.	DEO and the SPO are actively drafting governance documents that outline overall program governance, including roles, responsibilities, business and IT representatives for all in-flight projects as well as protocols and procedures for Change Control.
Program Vision	Program	9/21/2021	Closed	There was a delay in fully socializing and communicating the program vision with all DEO stakeholders.	Delays in communication impacts the cohesive understanding of the Program's vision across all DEO stakeholders	 Employ a vision development and/or program charter for the Program to solicit commitment and direction for the program. DEO could employ an enterprise-wide communication strategy and periodic town halls to maintain a working consensus among business and IT stakeholders around scope, objectives, and priorities. 	 Over the past several months, DEO has defined a program vision and held a kick-off meeting where DEO reports that participants were given an overview of the Program, the components of each project, and roles and responsibilities. DEO also shared materials created to communicate the ISF roadmap, FAQs, vision, goals, and objectives the Program. Additionally, the steering committee has made efforts to communicate the program status on a regular basis with business and IT stakeholders.

¹ "A RACI model is a responsibility assignment tool that describes how the roles of those involved in the project or program participate in the completion of tasks or deliverables. RACI stands for "responsible, accountable, consulted and informed," which are different roles that stakeholders could have (see <u>Tool: RACI Matrix for TMS Implementation</u>)."

3.3 Delivery Assurance

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Project charters and plans with detailed schedules	Program	9/21/2021	Low	Project charters that clearly articulate the scope, detailed activities and/or associated timelines, are not fully developed. There is a lack of evidence around coordination and dependency management that is needed between projects and the overall program.	Lack of a detailed program plan and schedule doesn't allow for accurate scope or schedule tracking. It may result in an incomplete picture of completed work Additionally, limited dependency management could cause project delays and inhibit projects from achieving their intended benefits.	Develop detailed project charters with scope, objectives, benefits, milestones, deliverables, tim elines, etc. along with a coordinated overall program view of projects and their dependencies.	 DEO leadership has requested that Project Managers complete initiation packets with the artifacts as currently listed by Florida Digital Services (60GG). Initial documentation is complete for active projects and is under review by IV&V.
Business and Technical documentat ion	Program	9/21/2021	Low	Interviews with DEO stakeholders highlighted obsolete technical design and business process documentation.	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.	DEO could institute new policies and procedures to create a baseline of updated business and technical documentation and a discipline for maintaining system artifacts.	DEO has shared that they have added a mandatory step for business and technical documentation and are working on formalizing the process within the next two months.

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Business validation of Reports	Reporting	10/26/2021	Closed	Business Stakeholder interviews highlighted that while a subset of business team members is involved in high-level functional testing of reports, there is no formal process to validate the reports with business stakeholders of Claims or Adjudication or Appeals, etc. who would have the deep business or report knowledge. Reporting Operational Work Plan¹ clearly stated that business validation of the reports is not part of the scope of the project, however, reports should be confirmed with business stakeholders to ensure report quality and validity from a business standpoint.	The impact of little to no business validation could jeopardize the quality of these reports.	Use business validation to ensure reports meet business requirements and produce accurate results on claims, appeal, and adjudication-related data.	DEO confirmed business validation of reports has been added in scope for this project. DEO recently shared that all reports completed in the data warehouse have been validated by relevant business stakeholders.
Scope for Phase 2 of RA Help Center	RA Help Center	10/27/2021	Closed	While the project charter section in the RAHC Operational Work Plan mentions that Phase 2 of the project would include citizen master data management and data analytics, the Work Breakdown Structure in the same document doesn't include any corresponding activities.	A lack of planning around Phase 2 could lead to unexpected delays in the project schedule.	DEO could confirm and update the Operational Work Plan with Phase 2 scope. DEO could identify related user stories and tie them to the work breakdown structure and overall schedule.	 DEO shared that the scope of the Program exclusively covers Phase 1 of the RA Help Center project. Phase 2 will consist of "continuous modernization" and is outside the scope of the Program. The continued work will also operate under a different source of funding.

¹ DEO's Operational Work Plans are created for each project and updated monthly. They include a Project Charter, Work Breakdown Structure, Resource Loaded Project Schedule, Project Spending Plan, Project Organization and Methodology, Business Process Organizational Change Management Plan, Project Risk Management Plan, and Capacity Plan

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Unclear if the RA Help Center and Contact Center will be integrated to reap synergy benefits	RA Help Center	10/27/2021	Closed	There are obvious synergies between RA Help Center and DEO's Contact Center, however, it is unclear if these will be integrated in the future to reap the benefit of a "single location for claimants to get direction" (as mentioned in the Operational Work Plan).	Disregarding synergies could impact the ability for the RA Help Center to achieve the intended benefits.	DEO could confirm synergies and a plan to consolidate tools for a single location for claim information.	DEO shared documentation communicating how they plan to act upon the synergy in later phases outside the scope of the Program. Specifically, issues that cannot be handled by the RA Help Center will be directed to the Call Center.
Dedicated testing for CONNECT'S Data Warehouse	Data Warehouse	10/26/2021	Closed	While the development team has conducted peer reviews for CONNECT's Data Warehouse, there are no dedicated testers or testing cycles allocated to validate the ETL (extract, transform & load) process or the Data Warehouse configuration.	Validity of the Data Warehouse and ETL process is dependent on ad hoc testing of reports which may uncover only a few issues. Per best practices, limited comprehensiveness of testing limits the confidence in the integrity, accuracy, and consistency of the ETL transactions within the Data Warehouse.	Introduce dedicated testing cycles for the Data Warehouse to verify the validity, integrity, and accuracy against the Data Warehouse requirements	DEO shared evidence of testing practices in line with considerations.
Data Warehouse project deemed "complete" while transition and training is incomplete	Data Warehouse	10/26/2021	Closed	The Data Warehouse project's IT team is primarily focused on technical project implementation and hence considers the project to be complete even though the transition to an operations team has not occurred. A seamless project transition additionally requires detailed transition planning and training for the Operations team.	Per best practices, a project is deemed as complete once transition to IT Operations and closure activities have occurred. Improper transition to operations before project closure could cause challenges with ongoing maintenance of the Data Warehouse. One such challenge has been the lack of timely certificate updates to the Data Warehouse post deployment.	The Data Warehouse team could look to define a transition plan for the Data Warehouse project along with established training manuals. While this is ongoing, the Data Warehouse should not be deemed complete.	Per DEO, the project was not deemed "complete." Confusion was rooted in the fact that the Data Warehouse technology had been deployed in production. The Data Warehouse team continues with its transition and training activities.

3.4 Suppliers Management

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Oracle 19C Upgrade	Cloud Migration	10/26/2021	Low	Interviews with DEO stakeholders highlighted that the CONNECT to Cloud project is dependent on the Oracle 19C Upgrade before migrating applications to the cloud.	Any delays in an upstream initiative could impact the project schedule or delivery of the Cloud Migration project.	 The project plan could include the dependency constraint on the Oracle 19C Upgrade. DEO could ensure close collaboration between project managers and leads for each of the initiatives to monitor the execution and any delays. 	DEO shared that the upgrade to Oracle 19c is complete, except for one component (the FIRRE system), which will be upgraded in January 2022.
Availability of cloud licenses for Oracle	Cloud Migration	10/26/2021	Closed	Interviews with DEO stakeholders highlighted constraints around vendor discussions for securing Oracle cloud licenses.	Any delays in securing licenses could impact Cloud Migration's project schedule.	DEO could add license dependency constraints to the project plan and continue to monitor the risk's impact for the critical path.	DEO shared that they have now procured the necessary licenses.

3.5 Financials

No Risks Identified as of January 2022 Quarterly Report

3.6 People

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Program Resources	Program	9/21/2021	High	DEO has faced high staff turnover and continues to face challenges in hiring, onboarding, and retaining new resources both on IT and Business side.	Delays in having adequate and skilled resources will impede Program/project progress. In other cases, it can cause team members to be overworked and lead to turnover.	 To promote staff retention and effectively manage a remote workforce, DEO could develop employee engagement policies and create opportunities for project team members to connect and communicate regularly. Clarifying project tasks and timelines can help add structure to project delivery. Per best practices, it would be beneficial to scale up project-level resource forecasts at the Program-level and compare it with other competing initiatives. This will help identify resource dependencies and define an effective resource sharing and capacity plan. DEO could look to develop alternate resource plans (e.g., outsourcing, staff augmentation strategies with third parties, or insourcing from other parts of DEO by running significant efforts already underway in parallel.) 	 DEO will use vendors to fill staffing gaps. The SPO was onboarded in December, which has increased the number of Project Managers. Staffing gaps remain regarding technical delivery of the project. A System and Software Integrator vendor will be onboarded in 2022. DEO is expecting the System Integrator to help fill delivery resource gaps. DEO to produce charts and other quantifiable evidence to show some staffing progress.
Data Warehouse Training Materials	Data Warehouse	10/26/2021	Closed	Limited evidence of training materials produced for business users on how to use the Data Warehouse.	This could impact DEO's adoption of the Data Warehouse in order to achieve project benefits identified in the ISF report	DEO could invest more time in developing training materials and training users on the value and purpose of the Data Warehouse. DEO could tailor the training material based on the persona of the Data Warehouse users.	DEO shared that business users will not have direct access to the Data Warehouse, only access to the final products in Tableau. Tableau training materials have been created such as the ETA User Guide and Reports Release artifacts.

3.7 Technology and Architecture

Risk Name	Applicability	Date Identified	Risk Rating	Risk Description	Potential Impacts	Considerations	Actions Taken by DEO
Communication Around CONNECT Target State	Program	10/27/2021	Low	Interviews with DEO stakeholders highlighted a lack of clarity around CONNECT target state architecture and roadmap	Lack of a clear roadmap could lead to uncertainty around how the CONNECT landscape would react to the addition of various components introduced during the Program.	DEO could define a target state for the CONNECT application landscape and conduct ongoing Architectural Review Board meetings to ensure any system changes are in line with the overall target state vision for CONNECT.	DEO shared Change Advisory Board, Architecture Team and Benefit Systems Cloud Roadmap, which are under review.
CONNECT System's Limited Concurrent User Access	Reporting	10/26/2021	Closed	Interviews with DEO stakeholders highlighted that the CONNECT system cannot handle many concurrent users due to database access constraints and there are times when the pipeline updates are done on weekends	Not having access to the CONNECT system could lead to downtime or delays in delivery of reports	Continue to monitor the CONNECT system access risk by proactively scheduling the CONNECT DB access.	Per DEO, this is out of scope for the Reemployment Claims and Benefits Information System Modernization Program.