Quality Assurance Monthly Report

Washington College Savings Program Project

Reporting through February 2018

Prepared by:
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WSAC IAA # 2017-18-007

Washington Student Achievement Council

Washington College Savings Program Project

March 5, 2018

Don Bennett, Executive Sponsor
Washington Student Achievement Council
917 Lakeridge Way
Olympia, Washington 98502

RE: Washington College Savings Plan Project
Quality Assurance Monthly Report through February 2018
WSAC IAA 2017-18-007

Dear Mr. Bennett:

I was contracted through the Technology Solutions Group of the Washington State Board for Community and Technical Colleges to provide external quality assurance for the Washington College Savings Plan Project (WCSP). The following Monthly Quality Assurance Report covering February 2018 was prepared independently per OCIO Policy Standard 132.3.

In February, project progress continued steadily on parallel project tracks of marketing, operations, and IT planning, informed by the specificity of WSAC's RFP and BNY Mellon's proposal. The contract was signed on February 15, permitting finalization of planning details for both teams' activities leading to launch. The contract Implementation Plan showed a Launch date of April 11 and this date remained stable through February. On March 5, BNY Mellon shared a revised Implementation Plan with a revised target date for Soft Launch of April 23. The Project and Schedule are assessed as improving because WSAC readiness planning has only just begun, increasing the importance and value of communications as teams' efforts converge toward launch. Schedule instability is expected to resolve and critical path clarity is expected to emerge by the end of March. Budget and Scope remain assessed as stable.

The first Finding, ID #1 (opened in September 2017), related to the lack of a signed contract, was closed on February 15 when parties completed the signing process. The third Finding, ID #6 (opened in December 2017) remains open, related to the instability in the project schedule and the absence of confirmed critical path to successful launch. WSAC implemented two of the January readiness recommendations – commence readiness planning and create a log for deferred enhancements - and continues work on the other four.

Thank you for the opportunity to provide external quality assurance services to the WSAC College Savings Plan Project. Please let me know if you have any questions or want to discuss this report.

Sincerely,

Beverly Hempleman
External Quality Assurance / Washington College Savings Plan Project
Washington Student Achievement Council
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cc: Laura Parma, Washington State Office of the Chief Information Officer

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Version History

Version	Date	Description
2.5	3/13/2018	Draft reviewed with Executive Sponsor
FINAL	3/14/2018	Revised version to Executive Sponsor

1. Executive Summary

1.1 Project Overview

The unique nature of this project cannot be overstated. The enabling legislation directed WSAC to establish a 529 college savings plan; however, the legislature provided no funding to support this effort. This resulted in a creative collaboration on an atypical funding arrangement where the vendor - Bank of New York Mellon Corporation, Sumday Administration, LLC (BNY Mellon) - is providing the lion's share of the development work at its own expense. Additionally, BNY Mellon has the lead role in project management, as they will manage the Washington College Savings Plan, now named "DreamAhead," via a 10-year contract signed on February 15, 2018.

> *For this project, the vendor - BNY Mellon - is to "provide financial services, back office records administration supported by a robust vended account management platform, and customer service supported by a vended customer-friendly front-end user interface. It must also provide a seamless customer experience that facilitates transactions between the new vendor-administrated savings plan and the agency-administered GET program, and between the savings plan and 529 plans in other states." – WSAC IT Investment Plan, September 21, 2017*

This project is also unique in that the consequences of premature or failed launch are high, and there is no legislatively mandated "go live" date. Compensation for BNY Mellon begins after launch; i.e., after the DreamAhead College Savings Plan is operational. This long-term vendor agreement between WSAC and BNY Mellon represents BNY Mellon's entry into the college savings plan marketplace, and success of this project is a high priority for the BNY Mellon / Sumday group. Both teams demonstrate a strong commitment to implementation of industry best practices in order to enter a competitive and mature market.

1.2 Project Assessment

DreamAhead Project activities continued steadily on marketing, operations, investments and "rollover" planning activities, guided by the specificity of WSAC's RFP and BNY Mellon's proposal and work sessions conducted by BNY Mellon after Kickoff in summer 2017. In February, a major milestone was achieved when the contract was signed on February 15.

At the end of February, the WCSP College Savings Plan Project and Schedule are assessed as improving and still needing attention. Working together under this new contract relationship has just begun, and by the end of March a firm Schedule is anticipated, with confirmed definitions, criteria and common ground - if any - for synchronizations of "Go / No Go" decisions and milestones prior to launch. Project and Schedule QA assessments could improve to Stable by the end of March. Project Scope and Budget are both again assessed as Stable for February.

Schedule

The Project Schedule is assessed as improving however, needing attention. The assessment improved due to the February 15 contract signing. Work is in process at WSAC to validate critical path milestones and create readiness checklists for the target Launch date of April 11 [revised on March 5 to April 23].

WSAC began compiling a "DreamAhead Readiness Dashboard" based on input from the WSAC business work teams. Readiness planning and coordination are expected to progress throughout March, contributing to stabilization of the schedule. [Note: On March 5, BNY Mellon began including a "DreamAhead Soft Launch Checklist" with weekly meeting materials.]

1.2 Project assessment *(continued)*

The DreamAhead Project Schedule is maintained by BNY Mellon. It is reviewed at weekly joint team meetings and updated to reflect input and activities of both teams. Project documentation is promptly available at the BNY Mellon DreamAhead SharePoint site. The WSAC team maintains a separate schedule of WSAC tasks and activities, which is reviewed at weekly steering committee meetings, and WSAC project documentation is available promptly in-house.

Budget ●

The WSAC Executive Sponsor monitors the WSAC DreamAhead Project Budget, which is reported as stable as of February 28, 2018. As the Program Owner at implementation, BNY Mellon is assuming most of the project development costs and does not disclose budget reports.

Scope ●

Project Scope remains assessed as Stable. The Scope is managed by both teams in separate sets of documentation. BNY Mellon as the Project lead maintains a SharePoint site accessible by both teams. Sufficient detail was provided in WSAC's RFP and BNY Mellon's detailed proposal to guide significant planning and preparation efforts. Work is progressing steadily within known parameters in collaboration with BNY Mellon counterparts. Operational and financial planning teams are finalizing investments and accounting processes. Marketing, communications, legal teams and web developers are have collaborated on the DreamAhead Brochure and the Dream Ahead Plan Disclosure Booklet. IT teams are making steady progress to create and validate the secure process for rolling over GET funds to DreamAhead; they meet weekly and chat online between meetings.

Both the BNY Mellon and WSAC DreamAhead teams demonstrate appropriate skills, experience, and strong motivation. These efficient teams demonstrate a commitment to responding quickly to issues as they arise. BNY Mellon provides capable and experienced project leadership, conducting weekly WebEx project and work team meetings to review status, timeline, and outstanding risks and issues. The WSAC Project Manager is ably managing the WSAC activities, conducting weekly Savings Plan Advisory Team (SPAT) meetings and creating internal documentation to document and monitor WSAC activities.

Within WSAC, the Guaranteed Education Tuition (GET) team has been anticipating the savings plan for several years. WSAC business units - financial, marketing and communications, and IT - are strongly collaborative, appropriately skilled, and well-motivated. Business unit teams demonstrate solid competence in addition to operational and logistical preparedness.

Assessment recap

QA Assessments - DreamAhead Project		Feb 2018	Jan 2018	Dec 2017	Nov 2017	Oct 2017
Project		⇧	●	●	●	●
1	**Scope**	●	●	●	●	●
2	**Schedule**	⇧	●	●	●	●
3	**Budget**	●	●	●	●	●

Stable: ● *Improving:* ⇧ *Attention:* ● *Alert:* ●

1.3 Priority issues

At the end of February, the one active Finding is ID #6 from December, related to Readiness planning. Implementation preparation and readiness planning remain the top priority. Clarification and confirmation of final planning details had been deferred until after contract signing. The recently-signed contract is expected to help stabilize the Schedule and add clarity to remaining project activities and critical path planning. With launch currently targeted for April 23, proactive and transparent communications will be important as teams converge toward implementation.

The contract was just recently signed (mid-February) and since then, WSAC has begun to compile information from internal workgroups for readiness checklists to detail and validate the remaining steps to deployment. At February 28, Launch is targeted for April 11. [On March 5, BNY Mellon moved Soft Launch to April 23.]

In addition to continuing work in process on remaining January Recommendations, February Recommendations address proactive communications and transparency with BNY Mellon in readiness preparations as well as validation of the remaining critical path items.

1.4 Updated Recommendations

ID #1: Contract not final and signed.

February 28, 2018 status: CLOSED.
Representatives for BNY Mellon and WSAC completed signing on February 15, 2018.

ID #6: Schedule and milestone slip, hard-stop dates not identified.

February 28, 2018 status: Open.

The contract was signed on February 15, permitting finalization of deferred planning details. The Implementation Plan in Schedule E of the contract showed a Launch date of April 11 and this date remained stable through February. [On March 5, a revised Schedule extended the target date for Soft Launch to April 23.] The Schedule is expected to stabilize by the end of March.

WSAC has begun compiling a Readiness Checklist and begun a spreadsheet to track Deferred Activities as recommended in January. Other readiness activities and preparations recommended in January have begun. BNY Mellon shares project artifacts, such as schedules and status reports, as a matter of process in joint meetings; WSAC steering committee meetings are internal to WSAC; WSAC does not share project artifacts with BNY Mellon in a joint meeting.

February 2018 Recommendations:

Launch date is quickly approaching. This increases the value and significance of proactive communications and transparency with BNY Mellon in readiness preparations. In addition to continuing work on January recommendations still in process:

1. Share and validate WSAC Readiness preparations with BNY Mellon.
2. Consider inviting BNY Mellon principals to weekly SPAT meetings, or combining some SPAT / BNY Mellon weekly meetings to enable quick turnaround of issues or questions. Share your planning efforts with BNY Mellon.
3. Collaborate with BNY Mellon to validate definitions, assumptions, “Launch” checklist criteria, and presence or lack common ground for synchronization of “Go / No Go” events and milestones preceding launch.

1.4 Updated Recommendations *(continued)*

Prior QA Recommendations - ID #6

January 31, 2018 status: Open.
In January, the Schedule and deployment milestone dates continued to slip. The BNY Mellon project manager stated that the Schedule slippage was due to lack of a signed contract. There is not yet a joint schedule showing dependencies between the teams or hard-stop dates that must be met to achieve "Soft Launch" by April 11 and project completion by June 30, 2018.

In February, a signed contract is expected to stabilize the schedule and fuel accelerated project activity such as informed critical path planning. Dependencies between the teams' activities can be documented, and deployment planning can be tied to the Schedule in the contract. With a final contract and final Schedule, project documents can be completed and theoretically stabilize milestones, enabling detailed planning for testing and defining criteria for Go / No Go decisions.

January Recommendations:

1. *Using the final contract Schedule, revisit / re-baseline the Schedule to confirm the critical path and commit to trying to achieve deployment by an agreed-upon date.*
2. *Collaborate with BNY Mellon to identify and document dependencies between teams for milestones preceding deployment; i.e., create a shared critical path showing dependencies between teams and Go / No Go checklists. Include the hard-stop deadlines to be met by each team to achieve deployment by an agreed-upon date and project conclusion by June 30, 2018.*
3. *Define success criteria and terms such as Go / No Go, UAT, QA, soft launch, Beta testing; check with BNY Mellon – do these terms mean the same thing to both teams?*
4. *Discuss and acknowledge how much additional schedule slip can be tolerated in remaining several months of the Schedule should teams commit to aim for an agreed-upon deployment date.*
5. *Begin documenting "wish-list" items to be deferred and addressed post-launch, i.e., in future enhancements to the DreamAhead program.*
6. *Consider creating a readiness checklist for WSAC activities per new OCIO Standard 121.10: Project Go-Live Readiness Decision Governance. While not mandatory for this project, this new policy standard - for IT investments determined to be "major" or "under OCIO project oversight" - reflects industry best practices, and could be adapted for the DreamAhead project while adding confidence to the Go / No Go decision process.*

December 29, 2017 status: New Finding. Open. *Updates to the December 11, 2017 BNY Project Plan extended each of the final four milestones by a full month, and the March 27, 2018 Launch was extended one week for a revised Launch date of April 4, 2018. [NOTE: … January 8, 2018 … Scheduled Launch ... again .. extended - to April 11, 2018.*

BNY Mellon has not stated any hard-stop dates for either team that must be met in order to achieve the target launch date [April 11, 2018 as of January 8, 2018] and projected IT Investment Plan project conclusion of June 2018. Hard-stop activities and due dates had not been documented by either team. ***Recommendations:***

- *… understand and identify reasons for and consequences of Schedule slippage.*
- *Collaborate … revisit … scope, schedule and resources, …. definition of success.*
- *Collaborate ... document and share … hard-stop deadlines .. to achieve launch.*
- *Document "wish-list" items to be deferred and addressed post-launch.*

1.5 Closed Findings, Observations, and Recommendations

ID#4: Observation – Technical risks and mitigation strategies not documented; closed in December 2017 report.

ID #2: Observation - Scope definition not finalized; closed in November 2017 report.

ID #3: Observation - Project Plan not finalized; closed in November 2017 report.

ID #5: Finding #2 - Role and responsibility confusion; closed in October 2017 report.

2. Transitional readiness

Operationally, the impact of the WCSP on WSAC staff and infrastructure is anticipated to be minimal, and contract negotiations through the end of January have generated no concerns to change that expectation.

The re-opening of the Guaranteed Education Tuition (GET) Program to new enrollees on November 1, 2017, after being closed to new enrollees for several years brought significant new traffic to the GET website. Statewide outreach in connection with GET is under way. The updated GET website provides basic information on the coming DreamAhead college savings plan, which coincides with this long-awaited program reopening.

Appropriate and accessible marketing and communications materials are in development and steady progress continues as teams collaborate on the website and Plan Disclosure materials. GET Operations teams and WSAC IT teams are collaborating with BNY Mellon teams on the financial and information technology details of the interface between the two entities, and developing the DreamAhead infrastructure.

The existing GET infrastructure is in place to respond to initial basic DreamAhead inquiries, and mailing list sign-up for those interested in the new savings plan already has over 900 interested parties. WSAC and BNY Mellon are staffed and well-positioned for continued success; however, training and testing have not yet begun.

3. Project tracking systems

Each team maintains separate Schedules and tracking systems. The durability and reliability of these systems will be important as efforts focus on the remaining 6-8 weeks preceding “Soft Launch” [targeted for April 23 per March 5 BNY Mellon Schedule].

The BNY Mellon Project Manager monitors the BNY Mellon Schedule and reviews project artifacts at weekly joint team meetings. The WSAC Project Manager reviews WSAC project documentation at weekly WSAC Steering Committee Meetings. These efforts have proceeded together across the country from each other since kickoff.

While BNY Mellon reviews project artifacts and tracking systems with WSAC at weekly joint team meetings, there is no similar window for BNY Mellon into WSAC weekly meetings or WSAC project artifacts and tracking systems. February 2018 recommendations (page 4) focus on proactive communication, transparency, and perhaps several joint team meetings with BNY Mellon as team efforts converge.

4. OCIO / Project Management Book of Knowledge (PMBOK) Areas

1	**Integration:** ⬆	**Over the life of the project, are effective project management processes being used and coordinated within the project and with all project participants to achieve desired results?**
Yes and No. Improving due to recent focus on readiness planning due to contract signing. The Vendor is the 'lead agency' on this project. At February 28, there has been no discussion of a shared critical path or validation of activities essential to successful launch, which moved from April 11 to April 23. The signed contract is anticipated to stabilize planning efforts throughout March.		

2	**Scope:** 🟢	**Does the project include an approach to managing scope to ensure the project success?**
Yes. As much as possible absent a final contract, Scope has been defined and informed by the specificity of WSAC's RFP and BNY Mellon's Vendor Response, which together have permitted both teams to make substantial progress throughout the contract negotiation progress. The contract, signed February 15, is not anticipated to change the Scope.		

3	**Time:** ⬆	**Is the project effectively managing the timely completion of the project?**
Yes and No. This is an unusual project; consequences of launch error are high and consequences of launch delay are negligible. Clarification and confirmation of final planning details had been deferred until after contract signing. The recently-signed contract is expected to help stabilize the Schedule and add clarity to remaining project activities and critical path planning. Readiness planning and coordination are expected to progress throughout March, also contributing to stabilization of the schedule.		

4	**Cost :** 🟢	**Is the project routinely estimating, budgeting, managing and controlling costs so that the project can successfully complete?**
As the Program Owner at implementation, BNY Mellon is assuming the lion's share of the project development costs and does not provide budget reports at team meetings. WSAC financial staff tracks WSAC project costs and status reports show high-level budget information.		

5	**Quality:** 🟢	**Is the project defining quality measures and using continuously improving processes to achieve project outcomes?**
Yes. The specificity of both WSAC's RFP and BNY Mellon's Vendor Response combined to provide detailed guidance for continuous improvement based on quality measures as teams collaborate on known project milestones and activities.		

Stable: 🟢 *Improving:* ⬆ *Attention:* 🟡 *Alert:* 🔴

OCIO / Project Management Book of Knowledge (PMBOK) Areas *(continued)*

6	**Human Resources:**	**Is the project acquiring, developing, and managing appropriately skilled and adequately staffed project teams?**

Yes. Existing WSAC project teams are accustomed to working together on GET and WSAC efforts. No new hires have been reported as necessary for long-term implementation at WSAC.

7	**Communications:**	**Is the team identifying stakeholders and supporting timely, appropriate and accessible communications over the project's life?**

Yes and No. The BNY Mellon Project Manager and the WSAC Project Manager post project documentation at team websites. Existing GET infrastructure is prepared to respond to initial basic DreamAhead inquiries, and the e-mail sign-up list for interested parties has over 900 names.

Transparency and proactive communications with BNY Mellon are important as teams' efforts converge. This issue needs attention because BNY Mellon again extended the schedule and did not inform WSAC until afterwards. See February 2018 Recommendations at the bottom of page 4.

8	**Risk:**	**Is the project effectively identifying, analyzing, and controlling project risks and issues?**

Yes and No; improving due to recent focus on readiness planning due to contract signing. Each team reviews risk and issue logs at weekly meetings.

Clarification and confirmation of final planning details had been deferred until after contract signing. The recently-signed contract is expected to add clarity to remaining project activities and stabilize critical path planning. Readiness planning and coordination are expected to progress throughout March, adding confidence to identification and minimization of risk.

9	**Procurement:**	**Is the project appropriately managing acquisition of products, services or results needed from outside the team? Is the project effectively managing the resulting contracts over the life of the contract?**

Not applicable. Procurement in this project is atypical; this is not a fee-for-service contract, as the vendor will only receive compensation after successful launch of the DreamAhead College Savings Plan. Procurement is reflected in the negotiating process, in building the relationship that will sustain DreamAhead for the first 10 years.

10	**Stakeholders:**	**Has the project identified key people, groups or organizations that could affect / be affected by the project? Is the project using appropriate strategies to engage stakeholders on project decisions? Is governance, sponsorship and stakeholder engagement effective?**

Yes. GET executive staff reports to the GET Committee at regular meetings and engages the Committee in project decisions as needed. Governance, sponsorship and stakeholder engagement of the overall project is strong, supportive, committed, and collaborative.

Stable: *Improving:* *Attention:* *Alert:*

5. Overview of Assessment Areas and Assessment History

	OCIO / Project Management Book of Knowledge Area	Feb 2018	Jan 2018	Dec 2017	Nov 2017	Oct 2017
1	**Integration** Over the life of the project, are effective project management processes being used and coordinated within the project and with all project participants to achieve desired results?	↑	🟡	🟡	🟢	🟡
2	**Scope** Does the project include an approach to managing scope to ensure the project success?	🟢	🟢	🟢	🟢	🟢
3	**Time** Is the project effectively managing the timely completion of the project?	↑	🟡	🟡	🟡	🟢
4	**Cost** Is the project routinely estimating, budgeting, managing and controlling costs so that the project can successfully complete?	🟢	🟢	🟢	🟢	🟢
5	**Quality** Is the project defining quality measures and using continuously improving processes to achieve project outcomes?	🟢	🟢	🟢	🟢	🟢
6	**Human Resources** Is the project acquiring, developing, and managing appropriately skilled and adequately staffed project teams?	🟢	🟢	🟢	🟢	🟢
7	**Communications** Is the team identifying stakeholders and supporting timely, appropriate and accessible communications over the project's life?	🟡	🟢	🟢	🟢	🟢
8	**Risk** Is the project effectively identifying, analyzing, and controlling project risks and issues?	↑	🟡	🟡	🟢	🟢
9	**Procurement** Is the project appropriately managing acquisition of products, services or results needed from outside the team? Is the project effectively managing the resulting contracts over the life of the contract?	🟢	🟢	🟢	🟢	🟢
10	**Stakeholders** Has the project identified key people, groups or organizations that could affect / be affected by the project? Is the project using appropriate strategies to engage stakeholders on project decisions? Is governance, sponsorship and stakeholder engagement effective?	🟢	🟢	🟢	🟢	🟢

Stable: 🟢 *Improving:* ↑ *Attention:* 🟡 *Alert:* 🔴

6. Glossary of Acronyms

BNY Mellon	Bank of New York Mellon Corporation, Sumday Administration, LLC
GET	Guaranteed Education Tuition
OCIO	Office of the Washington State Chief Information Officer
OCS	Washington State Office of Cyber Security
PMBOK	Project Management Book of Knowledge
QA	Quality Assurance
RFP	Request For Proposals
SPAT	Savings Plan Advisory Team, also known as the Steering Committee
WCSP	Washington College Savings Plan, branded DreamAhead
WSAC	Washington Student Achievement Council

7. Resources

DreamAhead meetings attended

Savings Plan Advisory Team (SPAT)	4
BNY Mellon Weekly Joint Team	4
BNY Mellon WebEx Planning	3

Resources

Project Management Book Of Knowledge (PMBOK) 5th edition.

Capability Maturity Model - Integration for Development (CMMI-DEV).

Organizational Project Management Maturity Model (OPM3®), Third Edition.

Project documentation

BNY Mellon – DreamAhead Project Plans

BNY Mellon Project weekly status reports

BNY Mellon milestones, activities, and project artifacts

BNY Mellon DreamAhead website – design and content

WSAC DreamAhead Project Management Plan and Gantt charts

WSAC IT Investment Plan

WSAC weekly and monthly project status reports

Office of Cyber Security Design Review Summary

8. Table: Findings and Recommendations

ID	Date	Status	Type	Description	QA Recommendation	Impact
1	9/5/2017	~~*Open.*~~ **CLOSED 2/28/2018**	Finding	**2/28/2018**: Contract signed February 15, 2018. **1/31/2018:** Contract negotiators have reportedly resolved immediate concerns and the signing process is anticipated to commence in February. This Finding is anticipated to be closed during February. **12/29/2017:** Contract not signed. Underlying reasons unknown. **Potential Impact:** Schedule may slip or stall, budget may increase, resources may be redirected. **11/30/2017**: Contract not signed; hard-stop deadlines not identified for target launch of 4/4/2018. **10/31/2017:** Contract not finalized per 9/1 target. **9/5/2017:** Contract and investment decisions are not finalized as scheduled targeted for 9/1/2017.	**2/28/2018: CLOSED.** **1/31/2018:** Sign the contract. Focus on the Schedule, coordination between teams, and preparing for launch. **12/29/2017**: Identify reasons for and consequences of additional delay with BNY Mellon; finalize and sign contract as soon as possible. ... In December report, Schedule slippage and lack of hard-stop dates are addressed in a new Finding (see **#ID #6**). ***11/30/2017:*** *Identify consequences of additional delay with BNY Mellon and share with teams the hard-stop deadlines that must be met to ensure targeted Launch of March 27, 2018, and conclusion by June 2018.* ***10/31/2017:*** *Finalize contract as soon as possible. Schedule has slipped; little room left to slip in order to achieve target implementation in mid-January 2018.* ***9/5/2017****: Finalize contract details and investment decisions ... ... permit detailed planning of scope, schedule and budget that have been pending. Delay adds potential to slip schedule, increase budget and lose access to human resources as competing projects arise.*	*High*

9. Table: Findings and Recommendations *(continued)*

ID	Date	Status	Type	Description	QA Recommendation	Impact
2	*9/5/2017*	***~~Open~~ CLOSED 11/30/2017***	*Observation*	*Observation: Scope definition has not been finalized, verified and approved. Potential Impact: Schedule may slip, budget may increase, human resources may have competing priorities.*	*11/30/2017:* ***CLOSED.*** *Not a contract issue.* *10/31/2017: Continue work on known activities in Project Plan. Carefully monitor and communicate remaining activities and critical deadlines. Finalize contract as soon as possible.* *9/5/2017: Finalize contract details and investment decisions as soon as possible. Complete definition of scope, assumptions.*	
3	*9/5/2017*	***~~Open~~ CLOSED 11/30/2017***	*Observation*	*Observation: Project plan has not been finalized. Potential Impact: Schedule may slip, budget may increase, human resources may have competing priorities*	*11/30/2017:* ***CLOSED.*** *WSAC teams collaborated in two planning sessions to create a detailed comprehensive plan showing activities and dependencies.* *10/31/2017: Pending completion of contract details, complete WSAC plan as much and as soon as possible using available information from all WSAC work teams, showing task dependencies and functional performance criteria. [NOTE: In early November, the WSAC Project Manager conducted the initial comprehensive planning session for creating and documenting the coordinated WSAC plan and schedule.]* *9/5/2017: Finalize contract details and investment decisions as soon as possible. Complete documentation of project plan, activities and functional performance criteria.*	
4	*9/5/2017*	***~~Open~~ CLOSED 12/29/2017***	*Observation*	*Observation: Technical risks have not been identified and mitigation strategies are not in place. Potential Impact: Schedule may slip, budget may increase, human resources may have competing priorities*	***12/29/2017: CLOSED.*** *This is not a contract issue. Technical design and development activities accelerated in December, in preparation for more active development work in January. Technical risks and mitigation strategies are being documented as IT development progresses.* *11/30/2017: Document technical risks and mitigation strategies in comprehensive plan, and review with teams.* *10/31/2017: Pending completion of contract details, complete as much and as soon as possible using available information from all WSAC work units to document technical risks and mitigation strategies in comprehensive plan.* *9/5/2017: Finalize contract details and investment decisions as soon as possible. Complete documentation of technical risks, mitigation strategies, functional*	

8. Table: Findings and Recommendations *(continued)*

ID	Date	Status	Type	Description	QA Recommendation	Impact
5	*9/5/2017*	*~~Open~~ —* ***CLOSED 10/31/2017***	*Finding*	*Some confusion with roles and responsibilities. WSAC PM has recently started and is still generating project documentation.*	*10/31/2017: Project manager completed documentation of project team, roles and responsibilities, and reviewed at weekly meeting.* ***CLOSED*** *9/5/2017: Complete documentation of roles and responsiblities; communicate to WSCP Project team.*	*Low*
6	12/29/2017	Open	Finding	**2/28/2018:** Contract signed Feb. 15, permitting finalization of deferred planning details. More launch schedule changes; schedule is expected to stabilize by end of March. BNY Mellon shares project artifacts w/WSAC as a matter of process in joint meetings; no similar share by WSAC. **1/31/2018, 12/29/2017:** See "Prior QA Recommendations - ID #6," on page 5 of this report for full text of these month-end status summaries.	**2/28/2018:** Launch date is quickly approaching, increasing value and significance of proactive communications and transparency with BNY Mellon in readiness preparations. In addition to continuing work on January recommendations still in process: 1. Share and validate WSAC Readiness preparations with BNY Mellon. 2. Consider inviting BNY Mellon principals to weekly SPAT meetings, or combining some SPAT / BNY Mellon weekly meetings to enable quick turnaround of issues or questions. Share your plannimng efforts with BNY Mellon. 3. Collaborate with BNY Mellon to validate definitions, assumptions, "Launch" checklist criteria, and presence or lack common ground for synchronization of "Go / No Go" events and remainining milestones. **1/31/2018, 12/29/2017:** See "Prior QA Recommendations - ID #6," on page 5 of this report for full text of these month-end Recommendations.	*High*