# NCCSD Webinar – Certification
10/22/2021

## Certification – Timing and Process of Certification

1. At what point did you start focusing on the Certification Guide's Appendix A Guidance in Preparing for Certification Reviews and discussing the certification process with OCSE? Was it early enough?

   - Successful certification starts with requirements management. Fed certification requirements were loaded directly into the requirements traceability matrix and not decomposed. (SC)
   - Preparation for certification begins with start of the project; early preparation and planning. (SC,OR)
   - For DDI RFP staffing requirements, consider both a Federal Certification Specialist and a Certification Manager on the state team. (SC)
   - Discussed certification with OCSE one year prior to system implementation with the intent of completing certification within one year after implementation. (MA)
   - Drafted certification guide response, based on other state certification responses, for OCSE review as soon as possible. (MA,SC)
   - Have practice demonstrations to make it as close to the certification process as possible. (MA)
   - Held a certification kick-off meeting that included the OCSE representative about one year prior to Phase 1 certification. (OR)
   - Quarterly OCSE reviews provided an opportunity to provide information on the project and prepare OCSE for certification. (SC)
   - Developed certification plan before pilot. (SC)
   - Formed a dedicated team of vendor and agency staff about 18 months before Phase 1 certification meeting. (OR)

2. How did your implementation and rollout approach integrate with certification (e.g., if you were taking an agile approach, did OCSE review modules incrementally also, or did they do a full Phase 1 review at implementation)?

   See Question #3.

3. When did the Phase 1 vs. Phase 2 visits occur?

   Phase 1 review:
   - Conducted after completion of pilot even though certain functionality was not in production. (SC)
   - Conducted after statewide implementation and a 2-3 month stabilization period. (OR)
   - Conducted after statewide implementation and a one-year system acceptance period. (MA)
   - Onsite review was one week (OR); remote review was 3 days each week for 3 weeks (MA).

   Phase 2 review:
   - Mock review after second of four regional rollouts with official review after statewide implementation. (SC)
   - Approximately 3 months after Phase 1 visit (OR)
   - Approximately 6 months after Phase 1 visit (MA)
   - Onsite review is about 3 days. (OR,MA)

4. What steps did you take to prepare the local offices, state disbursement unit, and/or your data center?

- During stabilization period, agency presenters conducted weekly walkthroughs of presentation materials. (OR)
- BA's that were leads in a functional area became leads for certification. (SC)
- Consider local offices that participated in system pilot or had staff that were a part of UAT/testing of certification requirements. (SC)
- Met with technical team and SDU ahead of time. (MA)
- State was able to identify offices that were visited for Phase 2. (OR)
- Agency management traveled with OCSE to each office to provide assistance and support. (OR)
- Conducted walkthroughs with local agencies to correct discrepancies prior to OCSE visit. (OR)
- With limited staff in offices as the result of COVID, the structure of the Phase 2 review may need to be negotiated with OCSE – bring all staff into the office, bring only the staff OCSE will speak with into the office, staff in county offices can remotely demonstrate what is being done in the offices. (MA)

## Certification – IRS and SSA Compliance

1. How did the timing of your IRS and SSA reviews fit with your system implementation and certification timing?

- IRS audit of legacy system in 2018; because of COVID, subsequent review of the new system occurred in 2021. (OR)

2. What were those agencies' expectations for documentation, etc.? N/A

# Certification – Preparing Certification Documentation

1. At what point did you focus on understanding the certification requirements and how they trace to federal regulation and law, and was that early enough?

   Answered by other questions.

2. Were there any certification requirements that created issues with state law or practice and how were they resolved?

   - AEI (MA)

3. How did you prepare for and run the Financial Distribution Test Deck? Were there any Test Deck scenarios where you expected issues because of state specific options, etc.?

   - Test deck was run three times during development (vendor) and one time during UAT (state team). State team ran final test prior to OCSE submission. (SC)
   - Obtain OCSE approval on the level of detail needed. (MA)
   - Started running test deck about 18 months before Phase 1 visit; ran the test deck in a different environment so it could be staged. OCSE representative reviewed test deck as it was developed and provided information about the level of detail that was expected. (OR)
   - The test deck was a collaborative effort between the DDI vendor (staged scenarios) and state BAs (testing).
   - Not many questions coming out of test deck from OCSE. (SC)

4. Who (state or vendor) was responsible for writing the Certification response document and gathering any supporting documentation?

   - Vendor responsible for drafting the certification response document and gathering support documentation (contract deliverable). State team conducted many reviews and had final approval of the documentation. (MA, SC, OR)
   - Work cannot be underestimated. (MA)

5. Was there anything for which OCSE asked that was a surprise?

   - Difference in interpretation of requirements (literal versus practical meaning); present what OCSE is asking for even if it is not your interpretation of the requirement. (MA)
   - Documenting and demonstrating each requirement starting with the very first step in the process every time. (MA)
   - OCSE introduced requirements outside the scope of cert guide, e.g., OCSE would not certify until there were fewer than 50 severity II defects in production. (MA)
   - Confirm environment. OCSE originally wanted a production environment; able to use a production-like environment copied within 45 days of the start of certification. Be aware of potential security issues when using production data. (MA) Created a shadow environment; duplicate environment taken from production. (SC)
   - Technical review was very cursory; functional review was very intensive. (MA)

6.  Were there any variations from the Certification Guide's Appendix A Guidance in Preparing for Certification Reviews? When should document preparation start?

    - See note above about OCSE having requirements that were not in Appendix A or the Certification Guide (MA).
    - Recommend starting as early as possible (SC, MA, OR).
    - Started about 18 months before official submission to OCSE. (MA)

7.  What did you find were the best ways to trace the system functionality to the Certification Requirements?

    - Requirements Traceability Matrix (RTM) to trace federal requirements to use cases, design documentation, source code, UAT scripts. (MA, OR, SC)
    - Validation of functionality by Business Functional Team Leads. (MA)
    - An owner is assigned to each requirement. (SC)
    - Tools such as Team Foundation Server (TFS). (SC)
    - RTM built daily, monitored weekly, and trended monthly. (SC)