I. PURPOSE:

The Office of Information and Technology (OIT) Project Management Accountability System (PMAS) Guide requires three types of independent reviews to be conducted to ensure effective oversight of IT projects: PMAS Start/Restart Reviews, PMAS Compliance Reviews, and PMAS Outcome Reviews. Of those independent reviews, Enterprise Risk Management Office (ERM) is tasked with conducting the PMAS Compliance Reviews. At this time ERMCO will review all IT projects in the 'Active' state for compliance with all requirements listed in the current version of the PMAS Guide. This ERMCO Standard Operating Procedure (SOP) stipulates the procedures ERM personnel will follow in conducting these PMAS Compliance Reviews.

As with all ERM work products, the PMAS Compliance Review checklists and reports are considered to be internal OIT work products. While they may not contain VA sensitive information that must be encrypted, they are intended for internal OIT use only and may not be shared outside of ERM without the ERM Executive Director's authorization (except as directed in this SOP).

II. SCOPE:

At this time ERM's task is to review all VA IT projects subject to PMAS that are in the 'Active' state to ensure compliance with the current PMAS Guide and ProPath processes. This does not preclude expanding the review activity to projects with other states in the future at the direction of the ERM Executive Director. The PMAS Guide provides OIT policy on managing VA IT projects and ProPath provides OIT procedures for compliance with the PMAS policy. PMAS Compliance Reviews will be conducted remotely, unless otherwise directed. Only 'Active' projects will be reviewed, as projects in other states have significantly less requirements and are subjected to other oversight. For example, projects in the 'Planning' state only have to conduct periodic reviews every 60 days to ensure they are continuing toward the 'Active' state, and they are subject to a comprehensive PMAS Milestone Reviews before they are authorized to move into the 'Active' state.

III. ROLES AND RESPONSIBILITIES:

A. ERM Executive Director. The ERM Executive Director is responsible for:

1. Authorizing follow-up reviews requested by a PM.

B. ERMCO Team Director. The ERMCO Team Director (TD) is responsible for:

1. Obtaining necessary training and developing skills to ensure PMAS team personnel can perform PMAS Compliance Reviews.
2. Obtaining lists of all 'Active' IT projects subject to PMAS from the PMAS Business Office and coordinating scheduling of PMAS Compliance Reviews.
3. Assigning a Team Lead to lead the PMAS Compliance Reviews and ensure their timely completion.
4. Determining the size and composition of each PMAS Compliance Review team.
5. Ensuring all PMAS project team personnel have access to the required project artifact repositories.
6. Managing the PMAS Compliance Review process, including reviewing all final reports.

C. ERMCO PMAS Project Team Lead. The ERMCO PMAS Project Team Lead (TL) is responsible for:

1. Becoming familiar with the PMAS Guide, ProPath processes, the PMAS Dashboard, and other PMAS-related policies, procedures, and guidance documents.
2. Updating this standard operating procedure to ensure synchronization with PMAS-related policies, procedures, and guidance.
3. Notifying PMs of scheduled project reviews.
4. Editing or approving final reports and posting them, and the compliance review checklist, to the appropriate project folder on the ERM SharePoint (SP) PMAS repository.

D. ERMCO PMAS Project Team Analysts. The ERMCO PMAS Project Team Analysts are responsible for:

1. Becoming familiar with the PMAS Guide, ProPath processes, the PMAS Dashboard, and other PMAS-related policies, procedures, and guidance documents.
2. Completing training and developing skills to perform PMAS Compliance Reviews.

3. Drafting the notification e-mail and forwarding it to the TL for sending to the project PM.
4. Coordinating the start date for the compliance review with the PM.
5. Sending the project point of contact (POC) a document review list.
6. Conducting the entrance and exit briefings.
7. Performing PMAS Compliance Reviews.
8. Ensuring only factual, project-related comments are entered into the ERMCO compliance review checklist.
9. Maintaining working documents sufficient to allow follow-up discussions at a later date, should there be questions about a project's compliance status for a particular requirement during the 'snapshot in time' reviews.
10. Drafting and submitting high-quality final reports and checklists to the TL.
11. Sending the final report and checklist to the PM after approval by the TL.

IV. PROCEDURES:

A. Pre-review Procedures.

1. The TD will obtain a list of all 'Active' projects to be reviewed from the PMAS Business Office and coordinate scheduling of the reviews with the TL. Unless otherwise directed by the TD, each project will be assigned one Analyst to conduct the review.
2. Upon being notified of the schedule for their compliance reviews, Analysts will:
   a) Verify they have access to the applicable required artifacts. Project artifacts can generally be found at the Technical Services Project Repository (TSPR) website or the Work Information Tracking System (WITS) website. For a listing of all templates for documents required for VA IT project management, view the Process Library website.
   b) Locate the applicable PM's name and contact information and provide it to the TL with the draft notification message.

3. The TL shall create a folder for each project at the ERM PMAS SharePoint site (in the 'Completed Project Reviews' folder) using the ERMCO standard naming convention – [date completed – project name] (e.g., "20120301 – NwHIN Direct"). This folder will be used later to upload the completed checklist and final report.

4. At least three weeks before the review is scheduled to begin, the Analyst will send a draft e-mail announcing the review to the TL. (See Appendix 1 for procedures on preparing and addressing the announcement e-mail.)

5. At least two weeks before the review is scheduled to begin, the TL will send the announcement e-mail to the designated PM.

6. Analysts will, whenever possible, attempt to accommodate a PM's request to reschedule a review (within the next few weeks) if the review could negatively impact a significant milestone, such as a scheduled increment delivery.

B. Review Procedures.

1. Entrance/Exit Briefings.

   a) Entrance/exit briefings shall be conducted remotely using video and teleconferencing tools (as appropriate and available to the PM and other project team members).

   b) After the notification e-mail has been sent, the assigned Analyst will contact the designated PM or project point-of-contact (POC) and provide them the option of having an entrance briefing. If no entrance briefing is desired by the PM/POC, the Analyst will coordinate the start date for the compliance review.

   c) During the entrance briefing, the Analyst will explain the reason for the review. (See Appendix 2 for a sample entrance briefing.) The Analyst will offer the project staff a short exit briefing when the review is complete. (See Appendix 2 for a sample exit briefing.)

   d) The Analyst will send the PM/POC a document review list (see Appendix 4). The project documents may be considered sensitive in nature and are intended for official use only. The acquisition/financial documents, in particular, must never be shared with non-government personnel or discussed with unauthorized persons – doing so may give a vendor a competitive advantage that can put an acquisition at risk. Such documents

can be reviewed over Live Meeting to avoid receiving/storing them, or by gaining access to the systems where they are stored. The Analyst will always follow the direction from the PM/POC with regard to encrypting the documents – if they encrypt the documents when sending them to the Analyst via e-mail, the Analyst will encrypt them when sending them to anyone else via e-mail.

e) The Analyst will coordinate with the PM/POC to identify the location of the project's artifact repository and to ensure the ERMCO team has access to view the artifacts.

2. Artifact Reviews.

a) When the review is to begin, the assigned Analyst will determine if all artifacts required by the current PMAS Guide and ProPath processes are present. This will require coordination with the POC, PM, and other designated project staff.

b) If any of the required artifacts are not available for review, or do not appear to meet the PMAS Guide or ProPath requirements (e.g., the document lists another project, or still has unchanged template information), the Analyst will note this in the checklist and final report. The Analysts will utilize the ERMCO checklist as a guide, along with the PMAS and ProPath required artifacts list.

3. Reporting.

a) Upon completion of the review, the Analyst will send the draft final report and the checklist to the PM within one calendar week. The Analyst will give the PM five (5) work days to review and provide any comments. Comments submitted after the deadline should be returned to the PM unless they have identified clear errors in the Analyst's observations.

b) The Analyst will submit the final report and checklist to the TL by the Analyst's close of business (COB) on the sixth (6th) workday after the completion of the review, along with any suggestions for improvements to the ERMCO SOP or checklist, the PMAS Guide, ProPath, or other relevant documents.

c) The TL will edit or approve the final report and checklist and return it to the Analyst, with courtesy copy (cc) to the TD, within one (1) calendar week.

d) The Analyst will send the final report and checklist to the PM, with a cc to the TD and TL, within one (1) work day.

e) The TL will upload the final report and checklist to the appropriate folder on the ERM PMAS SharePoint site within one (1) business day after it is sent to the PM.

f) The TL will forward any feedback on or suggested improvements to the PMAS Guide, ProPath processes, ERMCO SOP, or ERMCO checklist, as well as any noticeable trends, significant problems, etc., to the TD. After their review, the TD will forward the comments to the PD PMAS Business Office for further action.

V. QUALITY CONTROL AND RECORDS MANAGEMENT:

A. Change Management.

1. The ERMCO PMAS project team will use change management processes and version control to document future versions.

2. All relevant documentation will be stored in the PMAS folder on the ERMCO SharePoint site.

VI. REFERENCES:

Office of Information Technology Project Management Accountability System (PMAS) Guide v3.0.

APPROVED BY
DATE: April 20, 2012

[Insert digital signature here]

Tina M. Burnette
Executive Director
Enterprise Risk Management Office

Appendix 1

Procedures for Announcing a PMAS Compliance Review

This appendix outlines procedures Analysts will follow to draft an announcement message for a PMAS Compliance Review.

A. The announcement will be addressed to the following personnel.

1. In the "To:" field:

   a) Project Manager (Analysts will provide this information to the TL).

2. In the "CC:" field:

   a) ERMCO Director

   b) ERMCO Operations Officer

   c) ERMCO TL

   d) ERMCO TD

   e) PMAS Business Office – Point of Contact

B. In the "Subject:" field, enter "PMAS Compliance Review – [name of project being reviewed]."

C. In the body of the e-mail enter the following text:

Mr./Ms. [enter PM's last name here]:

On behalf of the VA CIO, Mr. Roger Baker, and the Executive Director of the Enterprise Risk Management Office, Ms. Tina Burnette, I would like to notify you that ERMCO will conduct a PMAS Compliance Review of the following project: **[enter project name here]**. The review will begin on **[enter start date here]**.

Scope: PMAS Compliance Reviews are required by the PMAS Guide (para. 4.3.3.2). I will review the project for compliance with the current PMAS Guide and ProPath processes using the checklist (a copy of the checklist will be provided to you in advance of the review). I will also be reviewing the PMAS Dashboard entries for accuracy and completeness.

Reporting: A draft report and checklist will be provided to you for your review and comments within one week after completion of the review. A final report and checklist will then be provided to you within 30 calendar days after completion of the review.

Action: To facilitate our review, please assign a representative to serve as your primary point-of-contact (POC) to coordinate schedule briefings, arrange interviews, and request access to required documents.

Thank you for your time. If you have any questions, please contact Stan Van Eps (ERMCO PMAS Compliance Review – Team Leader) at (202) 465-2704 or me by calling **(enter team member's phone number here)**.

Respectfully,

[Analyst's signature block]

Sent on behalf of:
Tina M. Burnette
Executive Director
Enterprise Risk Management Office

Appendix 2

Sample Entrance and Exit Briefings

Entrance Briefing

Good morning/afternoon. My name is _____ and I am the Analyst for this PMAS Compliance Review. PMAS Compliance Reviews are required by the PMAS Guide (para. 4.3.3.2). I will be reviewing the project for compliance with all requirements listed in the PMAS Guide and ProPath processes, and I will be verifying the accuracy and completeness of the PMAS Dashboard entries.

I will be in contact with your project staff throughout the review. I anticipate the review will take less than one week. An exit briefing is optional at your discretion. A draft report will be provided within one week after completion of the review, and a final report will be provided within 30 days after completion of the review.

Are there any questions at this time?

Exit Briefing

We would like to thank you for your professionalism and flexibility during our PMAS Compliance Review. We have reviewed your project artifacts and information to support the PMAS Dashboard entries. We have also notified the appropriate project team members of any issues we observed with respect to our PMAS Compliance Reviews. A final report will be provided within 30 days. Should you have any questions about remediation of any non-compliant requirements, please contact the PMAS Business Office for assistance. If you would like to request ERMCO conduct a follow-up review after non-compliant requirements have been remediated, please contact the ERMCO Director, Dr. Reuben Wright.

Thank you again.

Appendix 3

Sample Final Report

Office of Information Technology

Enterprise Risk Management Compliance Office

PMAS Compliance Review

[Name of Project]

EPS Number: [12335]

[Completion Date (e.g., July 4, 2011)]

PMAS Compliance Review Summary

100% compliant sample (use this paragraph only if the project was 100% compliant):

The PMAS Compliance Review of the [enter project name] was conducted on [insert date or dates]. At the time of the review, the project was in the Active state. The project met all (100%) of the requirements of the Project Management Accountability System (PMAS) Guide and ProPath processes.

OR

Less than 100% compliant sample (use if not 100% compliant):

The PMAS Compliance Review of the [enter project name] was conducted on [insert date or dates]. At the time of the review, the project was in the Active state.

As of the review date, the project was not in compliance with the Project Management Accountability System (PMAS) Guide or ProPath processes. The following observations were noted: [Any question from the checklist that has a "No" answer will be exported using the 'Report' function in the checklist and can be pasted below to replace these sample observations.]

1. There was no Project Charter.
2. There was no Acceptance Criteria Plan.
3. The Customer Acceptance Form for the last increment was not signed.
4. There was no Risk Log.
5. There was a "Red Flag" issue that was not elevated to the next level, not addressed, and/or not resolved.
6. A central repository for the project did not exist. There were artifacts in many different locations, to include hard copies on the desk of the Project Manager.

Please refer to the PMAS Guide and ProPath processes for information on the requirements for each observation listed above. Additionally, you may consider contacting the PMAS Business Office for guidance on establishing a remediation plan to become compliant. If you wish a follow up review to validate your remediation efforts, please contact the ERMCO Director.

Appendix 4

Document Review List

The information below, as well as an unfilled copy of the ERMCO checklist, may be sent to the project PM/POC in advance of the review to assist them in preparing for the review:

The following documents are required by the PMAS Guide and ProPath processes for each project in the Active state. ERMCO will require access to these documents (at a minimum) to conduct the PMAS Compliance Review:

1. Requirements Specification Document (RSD)
2. Project Charter
3. Integrated Project Team (IPT) Charter
4. Acceptance Criteria Plan
5. Quad Chart (Process Only)
6. System Design Document (SDD) or The Systems Engineering and Design Review Document (SEDR)
7. Project Management Plan (PMP)
8. Acquisition Strategy
9. Project Schedule
10. Risk Log/Risk Register
11. Enterprise Project Structure (EPS) (Process Only)
12. Contract Information
13. Product Evaluation and Decision Analysis (Buy Only)
14. Outcome Statement
15. PMAS Readiness Checklist
16. Executive Decision Memorandum (EDM)
17. Operational Acceptance Plan (OAP)
18. Customer Acceptance Form
19. Budget Tracking Tool (BTT)