

KING COUNTY AUDITOR'S OFFICE **Capital Projects Oversight**

ACCOUNTABLE BUSINESS TRANSFORMATION (ABT) PROGRAM OVERSIGHT REPORT FOR FOURTH QUARTER 2010



CURRENT RISK RATING Voverall risk remains elevated due to tight project schedules, limited budget flexibility, simultaneous project implementations, and staff vacancies. Attention is needed to adhere to project schedules and keep project teams fully staffed in order to meet go live dates.

∇ Scope

In September 2010, Finance Project scope was increased to address business needs for cash management, capacity charge billing, and side system integration. Payroll, Time and Labor (PTL) Project scope was changed to reduce the degree of automating pay rules.

▽ Schedule

Schedule reflects new go live dates for PTL and finance projects approved in September 2010.

System Projects	Council-Approved Go Live Schedule	Current Go Live Forecast	Comments	
Human Capital Mgmt	9/2/09	3/16/10 (actual)	Go live occurred 6½ months late	
PTL Group 1	1/3/11	1/1/12	Group 1: One-year delay Group 2: Six-month delay Group 3: No delay	
PTL Groups 2 and 3	Group 2 - 7/3/11	(all groups)		
	Group 3 - 1/1/12	(all gloups)		
Finance	1/1/11	1/1/12	One-year delay	
Operating/Capital Budget	4/1/12	2/28/12	30-day acceleration	
Performance Management	12/31/12	9/12	90-day acceleration	

▽ Budget

Budget reflects ABT's new forecast costs as of March 2011 based on scope, schedule, and other changes. Use of all but \$2.5 million of the contingency budget is required to meet new forecast costs of \$84.2 million.

Budget Category	Council- Approved Budget	Expenditures thru December 2010	Expenditures as % of Approved Budget	Forecast Costs at Completion	Forecast Change from Approved Budget
Planning	\$9,032,857	\$8,675,924	96%	\$8,675,924	(\$356,933)
Implementation	64,685,283	27,727,657	43%	65,042,216	356,933
Contingency	12,919,007	1,233,859	10%	10,454,247	(2,464,760)
Total	\$86,637,147	\$37,637,440	43%	\$84,172,387	(\$2,464,760)

Issues and Risks

- Side system readiness is critical for successful implementation of ABT projects.
- Governance structure reviews could impact ABT project schedules and costs if decisions are not made in a timely manner.
- Project schedules depend on keeping project teams fully staffed with the required expert functional and technical skills.
- Successful ABT implementation relies heavily on meaningful input and active participation by county agencies during all ABT meetings and review processes.
- Success in meeting new go live schedules will require adherence to new project plans.

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King County Auditor's Office - Cheryle Broom, County Auditor

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Capital Projects Oversight Program - Tina Rogers, Manager

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CPO oversight reports are available on the auditor's website (www.kingcounty.gov/auditor/reports) under the year of publication. Copies of reports can also be requested by mail at 516 Third Avenue, Rm. W-1033, Seattle, WA 98104, or by phone at 206-296-1655.

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INTRODUCTION

This is the ninth quarterly oversight report prepared for and submitted to the Government Accountability and Oversight Committee by the Capital Projects Oversight (CPO) Program on the status of the scope, schedule, budget, and risks for the Accountable Business Transformation (ABT) Program.

We continue to show the overall risk level for the ABT Program as yellow, indicating that attention is needed to adhere to project schedules and keep project teams fully staffed in order to meet go live dates, given the issues and risks identified and described in more detail in this report. ABT's new forecast costs for implementation as shown in Table 2 reflect an increase of 17% over the council-approved implementation budget, requiring further use of project contingency. The increased costs address scope increases, schedule delays, unforeseen complexity, and other changes. The risk profile for ABT remains elevated due to tight project schedules, limited budget flexibility, simultaneous project implementations, and staff vacancies.

This report comments on the ABT Program's March 2011 report covering fourth quarter 2010. The executive delivered this report to the Clerk of the Council on time on March 1. This report focuses on 2010 fourth quarter information contained in the executive's report, although in some cases more current information available at our publication date is used.

PROJECT STATUS

Finance Project – The design and configuration phases of the new Oracle financial system were completed in mid-December 2010, although some adjustments are still occurring. The development phase is nearly complete. The testing phase began with the first test cycle last fall and will continue through the end of November. The first test cycle confirmed configuration of the system. Test cycle (TC) 2 to confirm system integration was closed in February, and unresolved issues were moved to a new TC 2.5 that is still open. Further testing is planned for wastewater capacity charge and labor distribution functions (TC 3), cash management and treasury functions (TC 4), end user testing (TC 5), load and stress testing (TC 6), security and intrusion testing (TC 7), and cutover testing (TC 8). Training is scheduled to occur between October and mid-December. We will continue to track progress and completion of test cycles.

Payroll, Time and Labor (PTL) Project – The project is working on completing functional design and software configuration phases to implement the new PeopleSoft payroll/time and labor system, including working with agencies that have unique mandatory payroll requirements that require customizations. The Office of Labor Relations has nearly completed bargaining the effects of moving from a semi-monthly to biweekly payroll schedule for 55 affected bargaining units. System testing will begin in June and run through October. Training will begin in late September/early October and continue until mid-December.

Budget Project – The project met a key milestone in April as Business Technology Resource Group, Inc. (BTRG)¹ completed its work to identify business requirements for the county's new budget system using, Hyperion Planning software. This work began last December and involved a series of workshops with county agencies in January and February, resulting in identifying over 270 business requirements. The system business owner, the Office of Performance, Strategy, and Budget (PSB), has reviewed, validated, and approved the requirements. Technical requirements have been prepared and submitted by BTRG and are being reviewed by ABT staff for approval by the end of April. The project will then enter the design phase, which runs through May.

Performance Management Project – In December 2010 BTRG began discussions with the ABT project staff to develop a comprehensive scope of work for a performance management system for the county. This assessment concluded on March 31 and will result in an ABT Program recommendation to PSB and the

¹ BTRG is the system implementation consultant for the budget and performance management projects.

ABT Management Team. The recommendation will outline a countywide collaborative approach to the next phase of work, which may involve exercising an option in BTRG's contract to develop and implement the county's performance management system. Alternative approaches may include the development and release of a request for proposal to develop and implement the system. The schedule calls for the implementation phase to begin on July 1, regardless of the approach the county chooses to take.

Benefits Realization Project – Having established benefit outcomes in the April 2010 Benefits Realization Plan, the project has moved to conducting ongoing activities to monitor and evaluate achievement of outcomes. The survey of early Human Capital Management (HCM) outcomes, which had been planned to begin last December, has been delayed to allow for analysis of early data to help in the development of measurements for the survey and for the assignment of staff to design and conduct the survey. The new target date for the survey is July 1, 2011. Current project work consists of updating HCM Project metrics for inclusion in ABT's next quarterly report and, in conjunction with ABT change management staff, compiling a list of major business processes changes that are expected from ABT systems. The latter will also be included in ABT's next quarterly report and will form the basis for establishing ownership of benefits realization with ABT system business owners once the ABT Program is completed.

Scope

Project scopes remain unchanged from our last quarterly report. As we previously reported, the Finance Project scope was increased to accommodate critical business needs for cash management, capacity charge billing in the wastewater program, and side system integration. In addition, minor scope reductions were made. PTL Project scope related to the automation of pay rules was refined through detailed review and coordination with the Office of Labor Relations. The extent of payroll automation at go live will be significant, but less than originally planned in order to reduce risk and ensure a smooth transition.

Schedule

As shown on the cover page of this report, project schedules remain unchanged from our last quarterly report, with one exception. The go live date for the performance management system has been accelerated by three months (from December 2012 to September 2012) so that all ABT Program activities will conclude by the end of 2012.

As reported previously, the Finance Project has been delayed by one year. This was done to accommodate new scope and provide additional time for data conversion, side system integration, and testing. The delay in the Finance Project caused a one-year delay in the PTL Project, because the two systems are integrated through labor distribution and cannot be implemented separately without additional cost and risk. Go live for both projects will now occur at the same time, on January 1, 2012, just two months prior to the budget system go live date of February 28, 2012.

New resource-loaded project plans for the PTL, finance, and budget projects were completed in January. The plans are very detailed at the task level and are being used to guide ABT's work. The plans constitute new baseline schedules, although they will continue to undergo minor changes as project implementations go forward. The schedules continue to be tight with little room for slippage.

We have reviewed the process ABT uses to monitor performance to the plans and assure accountability. We found that ABT has enhanced its use of the plans as a management tool to identify and correct workload issues and task schedule slippage. The project managers regularly update the plans, noting progress at the task level and shifting resources or taking other actions to address slippages. While the plans do not show dependencies among the projects, a high-level Gantt chart is used for that purpose. The deputy program manager coordinates and assures effectiveness of these efforts.

We are continuing our discussions with ABT about how to reinstate the use of earned value analysis as measurements of both budget and schedule performance. We will report the results of our discussions in our next report.

Budget

In October 2008 the council appropriated \$64.7 million for ABT implementation and \$12.9 million for contingency. Since that time, funds from the contingency budget have been released on two occasions, consistent with procedures established by the council.² As shown in Table 1, a total of \$10.5 million of the \$12.9 million contingency budget has been released. Only \$2.5 million remains, providing limited flexibility in the event of unanticipated costs over the next year.

The first release of \$4.7 million occurred in December 2009. These funds have been used to address issues and risks related to side system readiness, change management, finance division year-end activities, and labor relations activities. The second release of \$5.8 million occurred in February 2011. These funds will be used to address delays in schedule for the finance and PTL projects, new scope added to the Finance Project for cash management and capacity charge billing, and other new resources added to reduce and manage risk.

Table 1. Contingency Budget Releases

Contingency Budget Releases	Amounts
Contingency Budget	\$12,919,007
December 2009 release	(4,688,868)
February 2011 release	(5,765,379)
Total released	(10,454,247)
Unreleased Contingency	\$2,464,760

² The procedures are established in Ordinance 16275. In both cases, the executive followed the procedures by providing written notice to the council of the plan to use contingency funds. CPO reviewed the written notifications and informed the council through memoranda that we found reasonable justification in each case. The memoranda contain additional details how the funds were to be used. (Memoranda from Tina Rogers, CPO Manager, to Metropolitan King County Councilmembers, dated December 1, 2009 and February 11, 2011.)

ABT included in its March 2011 quarterly report a "reformatted" budget along with revised forecast costs at completion, shown in Table 2 below. ABT reformatted the budget to pull out program-wide costs from the project lines and isolate them in the separate "Project Management Office (PMO)/Other" line. This line now includes program-wide and shared costs such as program management, communications, program oversight, space, and overhead charges. This is a reasonable approach and results in improved accountability by more accurately portraying program-wide costs in the "PMO/Other" line in the table and direct costs in the project lines. The bottom line did not change; only the budget categories within the bottom line were changed.

Table 2. ABT Reformatted Budget and Revised Forecast Costs at Completion

			Forecast Costs at Completion		
Council Appropriations	Council- Approved Budget	ABT Reformatted Approved Budget*	Forecast Costs	\$ Change from Reformatted Approved Budget	% Change from Reformatted Approved Budget
PLANNING	\$9,032,857	\$9,032,857	\$8,675,924	(\$356,933)	-4%
IMPLEMENTATION					
Finance	29,097,703	24,340,191	29,054,259	4,714,068	19%
HCM	10,238,471	7,232,823	6,302,717	(930,106)	-13%
PTL	20,424,577	13,844,941	16,578,859	2,733,918	20%
Budget/Perf Mgmt	4,834,286	4,294,097	5,643,116	1,349,019	31%
Benefits Realization	-	-	575,451	575,451	n/a
PMO/Other	90,246	14,973,231	17,342,061	2,368,830	16%
IMPLEMENTATION SUBTOTAL	64,685,283	64,685,283	75,496,463	10,811,180	17%
PLANNING AND IMPLEMENTATION TOTAL	73,718,140	73,718,140	84,172,387	10,454,247	14%
AVAILABLE CONTINGENCY	12,919,007	12,919,007	2,464,760	(\$10,454,247)	-81%
GRAND TOTAL APPROPRIATIONS	\$86,637,147	\$86,637,147	\$86,637,147		

^{*}From March 1, 2011 ABT Quarterly Report.

As shown above, the new forecast cost for ABT planning and implementation is \$84.2 million, leaving available \$2.5 million in unreleased contingency. Forecast implementation costs of \$75.5 million are in excess of the council-approved implementation budget by \$10.8 million. The gap is closed by forecasting use of contingency as well as savings from the planning phase and from the HCM project.

An increase in forecast costs was not unexpected, given the changes in scope and schedule for the PTL and finance projects noted in our previous report. ABT positions, in addition to the contract with the system integrator, Ciber, Inc., require extensions to complete the work to meet the new go live dates that were delayed by one year. New resources are required for new scope related to cash management, treasury, and capacity charge requirements in the finance system. The contract amount for the budget system implementer was higher than anticipated. Finally, the ABT Program Manager assessed King County staffing needs and has identified the need for additional resources to manage risks and complete the work on schedule.

In reviewing the forecast, we found that a reasonable level of rigor was used. Cost estimates were consistent with scope, schedule, and resource strategies and with expenditure trends to date. Assumptions were clearly documented and reviewed by the ABT Management Team. ABT revised their assumptions based on management team feedback, ultimately obtaining the management team's approval. ABT sought input and independent validation from other county agencies where appropriate, such as consulting with the Facilities Management Division about lease closeout costs and with PSB about unemployment claims costs.

One concern we would note, however, is that the \$1 million cost estimate for the performance management system, which is part of the Budget Project, was developed at a much lower level of detail. Currently there is a validation process underway that could result in changes to the performance management system cost estimate.

We examined more detailed breakdowns to determine the main categories of increase within the new forecast costs. We found that the main areas of increase were for:

- Consulting costs for Ciber (\$5.4 million), reflecting new scope and schedules for finance and PTL projects, as well as additional work to assist with re-planning efforts and labor relations testing last fall.
- County staffing costs for the Finance Project (\$2.6 million), including the continued use of contractors when necessary and appropriate.
- Consulting costs for the Budget Project (\$1.7 million) to reflect the actual cost of the consultant contract that was recently negotiated with BTRG.
- Updated cost categories, such as quality assurance, oversight, and benefits realization.
- Program closeout costs that were not considered in the original ABT budget.

ABT's new forecast shows that these estimated cost increases are offset in part by estimated underexpenditures in software and hardware purchases and related ongoing maintenance costs, in addition to actual savings in the completed planning phase and the HCM system.

Monthly expenditures as reported in IBIS for the fourth quarter have averaged \$1.9 million per month, up from an average of \$1.2 million per month during the third quarter. We would expect the rate of expenditures to increase significantly from this point forward, based on ABT's new forecast costs at completion.

As shown on the front page, ABT has expended \$28 million or 43% of its implementation budget as of fourth quarter 2010. These \$28 million in expenditures took place over a 23-month period between February 2009 and December 2010. Table 2 shows that ABT expects to spend a total of \$75 million on implementation at completion, or another \$47 million during the 24-month period in 2011 and 2012. This is \$19 million or 40% more than what was expended in roughly the same time period in 2009 and 2010, a significant increase in rate of expenditures. We will be monitoring ABT's rate of expenditures as one measure of performance to the ABT schedule.

Benefits Realization

PTL and finance project scope reductions and schedule delays will reduce benefits realization. The April 2010 update to Benefits Realization Plan reported expected annualized savings of 128.6 FTEs and \$11.2 million resulting from staffing efficiencies. ABT's preliminary estimates of the impacts of recent scope and schedule changes show a 10% reduction in both expected FTE and dollar savings. The ABT Management Team, however, has decided not to revise benefit targets for county agencies. This decision was made in order to continue to challenge agencies to realize benefits, especially in light of the possibility that there could be unanticipated benefits from ABT systems that will help offset these reductions. ABT has observed

such unanticipated benefits from the HCM Project, but they will not be quantified until the survey of early outcomes is completed within the next few months. We will review the survey results to determine whether unanticipated benefits have occurred.

Issues and Risks

The overall risk profile remains elevated due to tight project schedules, limited budget flexibility, simultaneous project implementations, and staffing challenges. The issues and risks we have identified below take on even more importance in this context of the overall risk profile. They are based on our observations, along with those of ABT management and ABT's quality management consultant. While work is underway to address these issues and risks, it is unknown at this time whether the activities are sufficient or will be fully effective at mitigating them. We consider them to be in "open" status.

1. Side system readiness is critical for successful implementation of ABT projects.

Summary: Seventy-eight side systems in 12 county agencies need modifications to interface with the new PTL and finance systems. The effort involves work by both ABT and agencies. The agencies will need to make modifications to their side systems and their sides of the interfaces. ABT will need to construct 22 interfaces on the enterprise side of the interfaces and ensure they function properly with the PeopleSoft and Oracle systems. ABT's work must be completed prior to go live dates for the payroll and finance systems. If an agency or ABT has not completed its work prior to go live on any particular interface, then that agency would not have access to the automated functionality supported by the interface. In that case, the agency would either defer certain transactions and/or manually enter data until the required work was completed.

Status: Open. ABT's enhanced efforts to mitigate this risk continue to be prudent, with the assignment of a dedicated resource to track the risk and the development of a tracking tool. As of March 8, 2011, ABT's side system development report showed that ten out of the 78 agency side system interfaces were categorized in the "red," meaning that the scheduled completion dates will be missed by 15 days or more. The number in the "red" is unchanged from our last report. Of these ten, only three are considered mandatory for implementation. As of the same date, all of ABT's 22 interfaces were on schedule to be completed prior to go live dates. ABT continues to monitor side system status on a weekly basis.

In March ABT conducted finance side system integration workshops for county agencies over a period of three weeks. ABT technical and functional staff were available during the workshops to answer questions and assist agencies with technical development issues.

2. Governance structure reviews could impact ABT project schedules and costs if decisions are not made in a timely manner.

Summary: The governance structure of ABT requires various levels of reviews and approvals by the ABT Management Team and the Project Review Board at key milestones of the program. While such reviews are necessary, they also have the potential of delaying project schedules and increasing costs if decisions are not made when they are needed. The potential for delay is compounded when membership on these bodies changes. Continued strong leadership is required to conduct reviews and make decisions in a timely manner to avoid delays that would in turn affect project schedules.

Status: Open. ABT conducted an extensive governance structure review to establish appropriate levels of approvals to provide accountability for the new scope, schedule, and budget and to assure adequate communications with key stakeholders and employees. This review involved meetings and/or communications with the County Executive, the ABT Management Team, the ABT Strategic

Advisory Committee and its leadership team, the ABT External Advisory Committee, the Project Review Board, and county employees. While this type of governance review takes time and increases demands on resources, we observed that ABT stayed on the schedule that was prepared for these purposes.

3. Project schedules depend upon keeping project teams fully staffed with the required expert functional and technical skills.

Summary: This issue has appeared in our previous reports and takes on even more significance because the project schedules, according to ABT, are achievable but tight. In order to stay on schedule, ABT must take appropriate actions to ensure that new and vacant positions are filled quickly with candidates who have the required experience and skills and to anticipate turnover and possible retention issues to the extent possible.

Status: Open. ABT's staffing plan as of March shows 78 positions, seven of which are vacant.³ ABT plans to fill the vacancies with four new county employees and three contractors, continuing to use its past practice of hiring contractors to fill positions that require special expertise that is difficult to find. While this practice can be more expensive, it has the potential advantage of filling vacancies in a timelier manner.

ABT, the quality management consultant, and CPO continue to have concerns about the attrition of information technology staff. In the past few months, four key staff left for the private sector where the demand for information technology skills is growing. In addition, there are concerns that some ABT staff, which are mostly term-limited temporary (TLT) employees, will seek other employment as their assigned projects near completion, and leave before the ABT work is completed.

Consistent with our recommendation in our last report in December, ABT is implementing strategies to mitigate this risk. ABT has analyzed the ABT workforce to identify the staff in positions that are most critical to keeping the projects on schedule and where vacancies might occur. The ABT program manager and deputy program manager meet frequently to review the staffing status. Recently ABT and the Division of Human Resources formed a task force to identify strategies for retaining staff. One strategy is to notify ABT staff of other vacant positions in the county that might provide ongoing employment once their TLT assignment has ended and their work on ABT projects is completed. Another strategy is to engage a professional recruiter to help fill developer positions if and when they become vacant. We will continue to monitor the effectiveness of ABT's response to these staffing challenges.

4. Successful ABT implementation relies heavily on meaningful input and active participation by county agencies during all ABT meetings as well as testing and readiness activities.

Summary: Subject matter experts from all agencies of county government must be available to attend ABT sessions for business requirements development, business process reviews, and user system testing. Inadequate participation by agencies may impact the quality of ABT systems and delay implementation if agencies have not completed their respective readiness activities. The ABT Program has employed a number of strategies for monitoring and insuring adequate agency involvement, including obtaining formal sign-off by agencies on key planning documents and following up directly with agencies that miss critical meetings.

Status: Open. The new schedule and implementation approach, with three major implementations in January and February 2012, places county agencies under even more pressure to participate, especially in light of continuing reductions to agency staffing and budgets. ABT continues to employ

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³ The staffing plan shows an additional six positions that are on hold pending further evaluation of need and timing.

mitigation strategies to address this risk through its regular meetings and communications with county agencies. At the end of March, ABT awarded \$467,500 from the ABT contingency budget to assist three county agencies with side system work and provide resources for staff support for other readiness activities. This award followed an announcement to all county agencies in December that contingency funds were available for these purposes.

5. Success in meeting new go live schedules will require adherence to new project plans.

Summary: As noted earlier, ABT project schedules are tight with little room for slippage, and missing interim milestones might put project go live dates at risk. Therefore, effective monitoring and prompt corrective action are necessary to address any milestones that are not met.

Status: Open. More frequent and detailed monitoring efforts, including review of new dashboard reporting for interim project milestones by the ABT Management Team, are underway. These are prudent strategies that address schedule risk. We will be looking for proactive planning and prompt corrective actions when and if project progress toward milestones is found to be lagging behind schedule.

RECOMMENDATIONS

Below are status updates on recommendations contained in our previous quarterly reports.

1. The ABT Program should compile agency interface costs and report them in its 2010 annual report, along with a status report on side systems and agency progress in meeting schedule deadlines for side system interface readiness. (First appeared - April 2, 2009, modified - October 14, 2009)

Status: Fully implemented. ABT has complied with the first part of this recommendation by reporting agency side system interface costs in its fourth quarter 2010 report, and we anticipate that will continue throughout the remainder of the ABT Program. As of that time, \$198,156 from ABT contingency had been awarded to three county agencies.⁴ In addition, three county agencies have received a total of \$1.9 million from various non-ABT sources.

ABT has also complied with the second part of the recommendation by initiating biweekly side system development reports and actively using them as a management tool. For each side system, these detailed reports show milestones for the completion of critical work components, such as requirements analysis, and functional and technical design. Through a red/yellow/green color coding system, ABT is able to identify when milestones are missed and take corrective action.

2. The ABT Program should review their past experiences with filling vacant positions and update their approach to address the current and potential future challenges for recruiting and hiring staff needed to meet project schedules. (First appeared - October 14, 2009) In addition, ABT should augment its staffing plan to include strategies for recruitment and retention to help ensure that project teams remain fully staffed and can be augmented as needed to address unplanned emerging resource needs. (First appeared - December 2010)

Status: ABT is complying with this recommendation by working with the Human Resources Division to develop and implement strategies to anticipate and reduce the likelihood of turnover, as noted above. We will be monitoring for adequacy and effectiveness of these strategies.

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⁴ We expect that this number will be updated in ABT's next quarterly report to reflect an additional \$82,000 in side system funding that was recently awarded.

3. The ABT Program should move as quickly as possible to execute the necessary contract amendments with Ciber to reflect the changes in scope and schedule for the Finance Project. (First appeared - December 2010)

Status: Fully implemented. ABT has complied with this recommendation. The \$2.8-million amendment was signed at the end of March, bringing Ciber's total contract for the finance system to \$12.6 million.

ACKNOWLEDGEMENTS

We conduct our oversight through monthly meetings with a working group of staff from the ABT Program, county auditor, council, PSB, and through other meetings as needed. We also review and conduct independent analysis where appropriate on formal reports issued by the ABT Program. In addition, we coordinate our oversight efforts by reviewing the reports of the Project Review Board and Pacific Consulting Group (PCG), Inc., the quality management consultant who reports directly to the ABT Program Sponsor.

We appreciate the collaborative efforts of the staff from the ABT Program, PSB, and the council for their input to effective oversight of the ABT Program consistent with council intent. We also appreciate the assistance from PCG and the staff of the Project Review Board towards coordinated oversight of this important countywide program. This report was prepared by Ron Perry, Tina Rogers, and Shelley Sutton. Should you have questions or comments on the report, please contact Tina Rogers, Capital Projects Oversight Manager or Ron Perry, Deputy County Auditor.

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