

Achieving Regulatory and Industry Standards Compliance with the Scaled Agile Framework®

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Regulatory requirements meet Agile development

Traditional development challenges regulatory assessment

- ▶ Often results in late verification, validation, and opportunities for compliance assessment
- ▶ Can create a large bow wave of testing and compliance activity resulting in missed deadlines and windows for schedule compliance activities
- ▶ Despite best efforts, compliance with large batches and late feedback slows flow and results in worse outcomes and lower quality
- ▶ No way to leverage compliance knowledge to improve flow



Regulatory and compliance meet Agile

Regulatory and compliance

- ▶ Quality, safety, security, efficacy
- ▶ Specifications
- ▶ Verification and validation
- ▶ Objective evidence
- ▶ Inspections, audits, sign-off
- ▶ Quality management systems
- ▶ Metrics – defects, requirements coverage, code coverage, traceability

Agile Manifesto

Working software over
comprehensive documentation

Customer collaboration over
contract negotiation

Responding to change over
following a plan

Welcome changing requirements....



Our QMS addresses compliance and other concerns

- ▶ Safety and efficacy concerns come from many sources
- ▶ QMS defines policies, processes, and procedures to meet relevant regulations



Two types of compliance requirements

On the Solution

Ensure product complies

“Sensitive information must be encrypted during transmission over networks that are easily accessed by malicious individuals”

– PCI Credit Card Standards

“Stopping from 20 miles per hour in a distance [...] that is not greater than the distance specified in the table in paragraph (d) ...”

– CFR Title 49 393.52 (automotive)



On the Quality Management System

Ensure process complies

“A documented software requirements specification (SRS) provides a baseline for both validation and verification.” -- US FDA 21 CFR 820

“The purpose of the Quality Assurance Process is to provide independent and objective assurance that work products and processes comply with predefined provisions and plans and that non-conformances are resolved and further prevented” -- ISO 15504, ASPICE



However, Waterfall legacy has embedded itself in our QMS

Waterfall development creates many problems

Under-estimated dependencies

Massive growth in complexity

Late delivery

Little visibility into process

Early commitment to specification that was insufficient

Phase gates aren't helping reduce risk

No way to improve systematically

Late discovery of issues

“Any notion that we are mandated to apply a single-pass, waterfall model to software development is an industry myth, one which has likely been perpetuated by our own waterfall past (“we have always done it this way”) and our existing quality management system, and not because “the regulations make us do it.” -- Dean Leffingwell

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the world's most important systems*

SAFe® is a freely revealed knowledge
base of integrated, proven patterns
for enterprise Lean-Agile
development.



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SAFe addresses both types of compliance requirements

Product is specified, designed, built and tested in accordance with regulations



Processes and procedures are performed in accordance with policy based on regulations


Build the solution and compliance incrementally

Organize for value and compliance

Build quality and compliance in

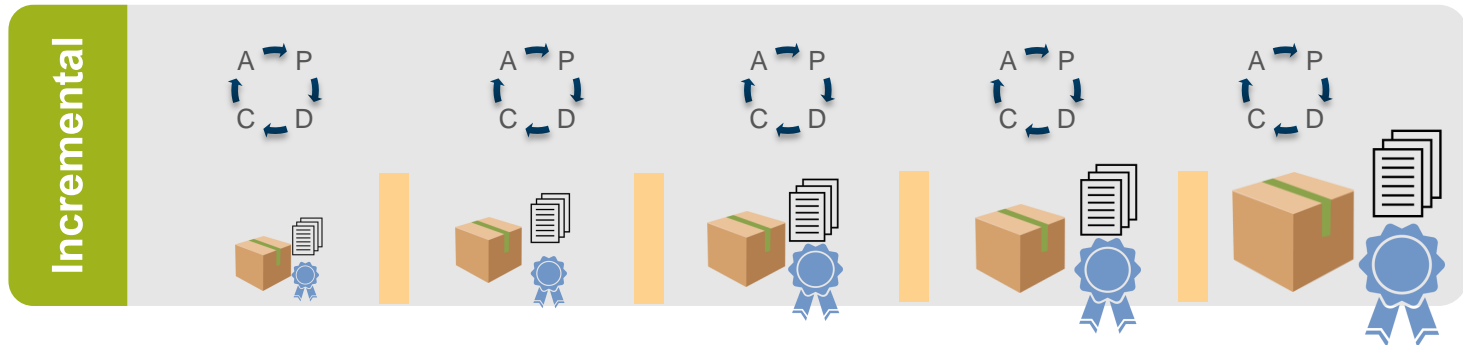
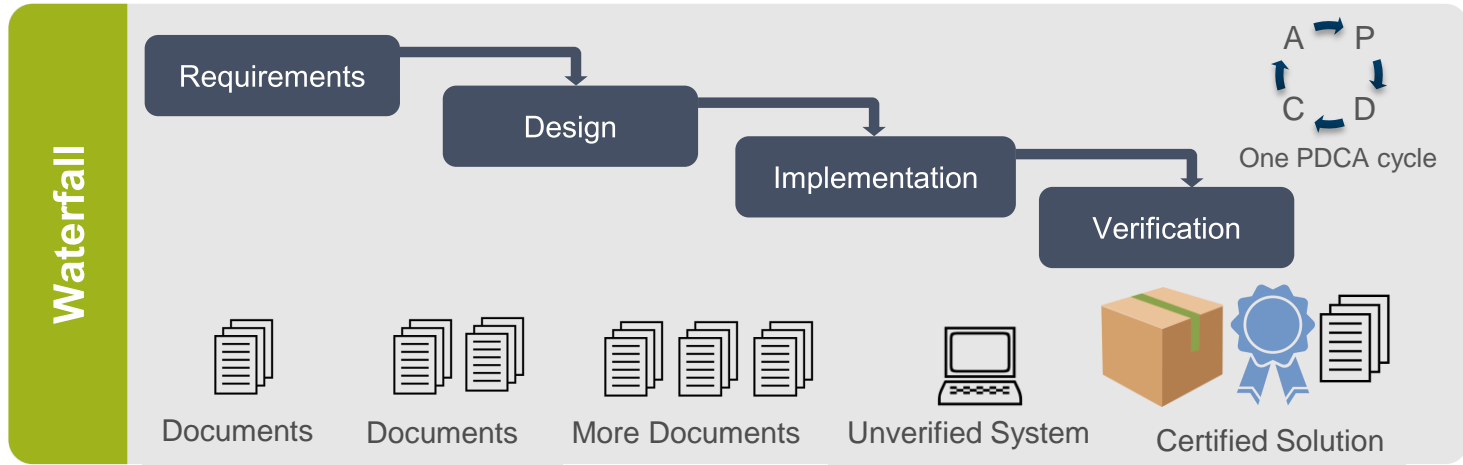
Apply continuous verification and validation

Meeting regulatory requirements with Lean-Agile development



Build the solution and compliance incrementally

Specify, build, and comply incrementally



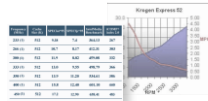
Provide objective evidence at every increment

Solution progress



- Objectives
- Vision
- Roadmap

Delivery progress



- Quality
- Compliance
- Manufacturability

Relentless improvement



- Customer feedback
- Regulatory feedback
- Validated learning



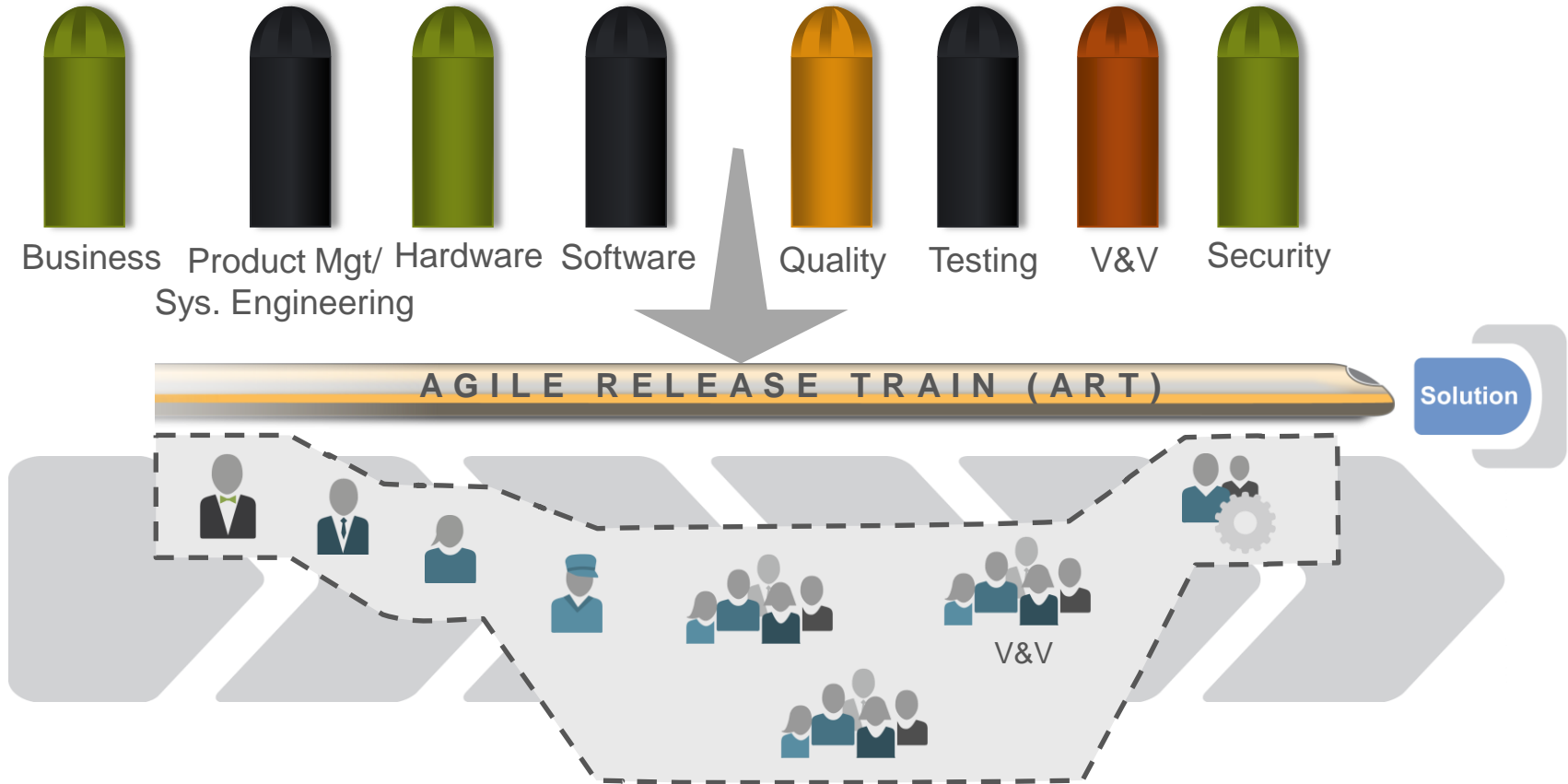
Improvement stories





Organize for value and compliance

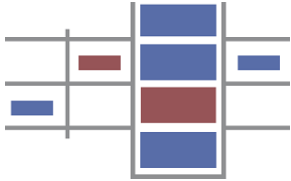
Cross-functional Agile Release Trains deliver value



Integrate regulatory, customer, and compliance concerns

Kanban and Backlog

Align and focus on work priorities



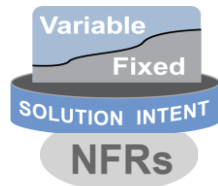
Roadmap

Know solution's future plan



Solution Intent

Shared understanding of system's goals, specifications, and constraints



PI Demo

Frequent feedback on fully-integrated system

PI Planning

Synchronizes on near term plan

Inspect & Adapt

Continuously improve together





Build quality and compliance in

Build quality practices into process as part of flow



“Processes and procedures are performed in accordance with policy based on regulations”



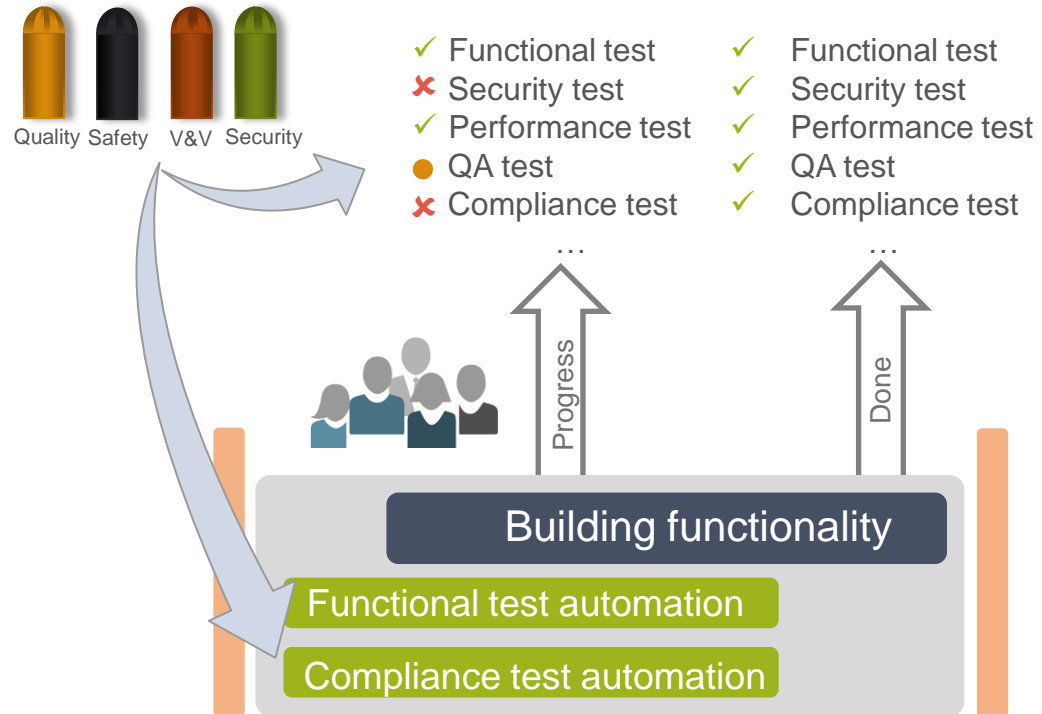
- ▶ Continuous integration
- ▶ Test-First
- ▶ Refactoring
- ▶ Pair-work
- ▶ Collective ownership
- ▶ Exploratory early iterations
- ▶ Model Based Systems Engineering (MBSE)
- ▶ Set-Based Design
- ▶ Frequent integration
- ▶ Design verification

- ▶ Reviews, audits, sign-offs
- ▶ V&V, IV&V
- ▶ Quality assurance activity
- ▶ Regulatory oversight
- ▶ Coverage, completeness

Accelerate feedback through automated compliance testing

Give teams automated scripts instead of checklists

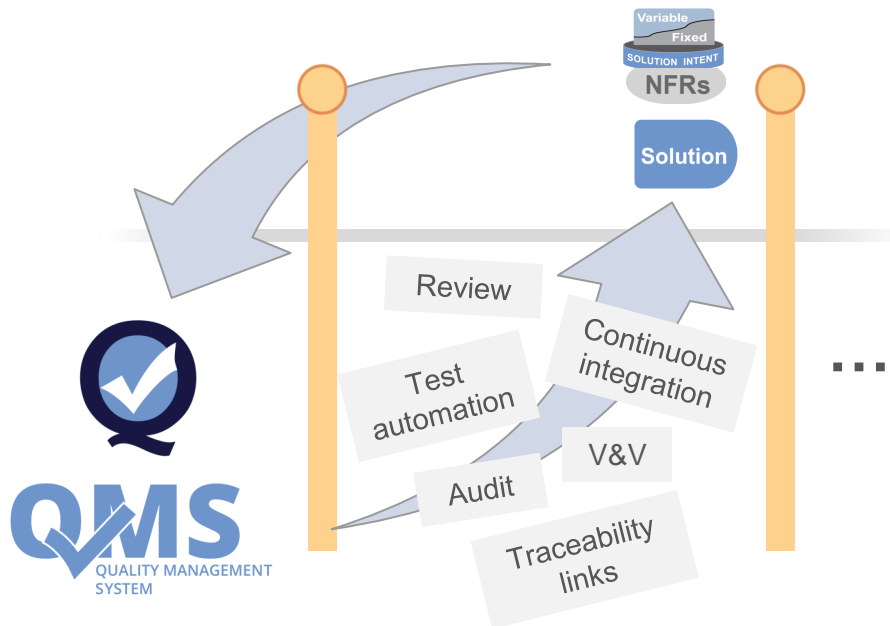
- ▶ Automate tests in the same iteration as the functionality
- ▶ Include tests for safety, security, performance, quality, etc.
- ▶ Invest in automated testing infrastructure to improve flow
- ▶ Actively maintain test data under version control



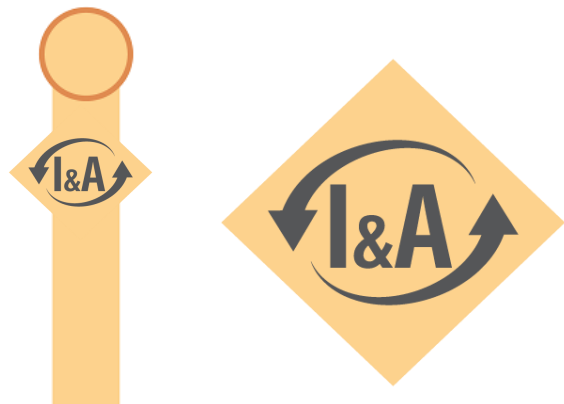
Continually reduce risk for meeting compliance objectives

Reduce last sign-off activity from a large, extended event to a quick, boring, non-event.

- ▶ Break compliance activities into smaller batches
- ▶ Regular cadence make compliance predictable
- ▶ Get visibility, transparency into assessment sooner
- ▶ Fast feedback continuously improves practices



Include compliance concerns in continuous improvement



Solution Demo

- Asses results of current compliance work and automated tests
- Demonstrate compliance status by assessing or generating latest information and documents

Quantitative Measurement

- Show trends towards meeting compliance solution and dev system
- % code coverage, % requirements coverage, peer reviews status
- % compliance concerns covered in automated tests

Retrospective and Problem Solving Workshop

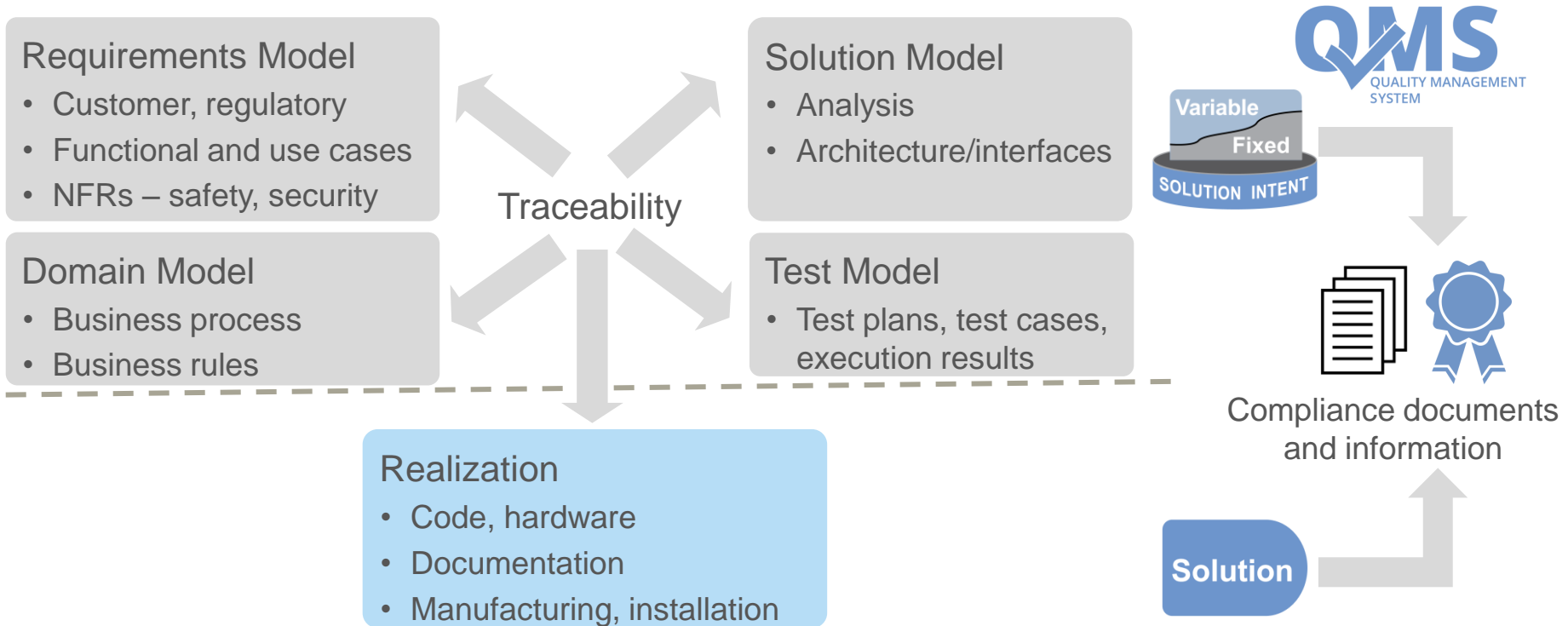
- Are we sufficiently addressing compliance goals?
- Are policies or procedures inhibiting development?
- If so, can we find alternatives to meeting compliance goals



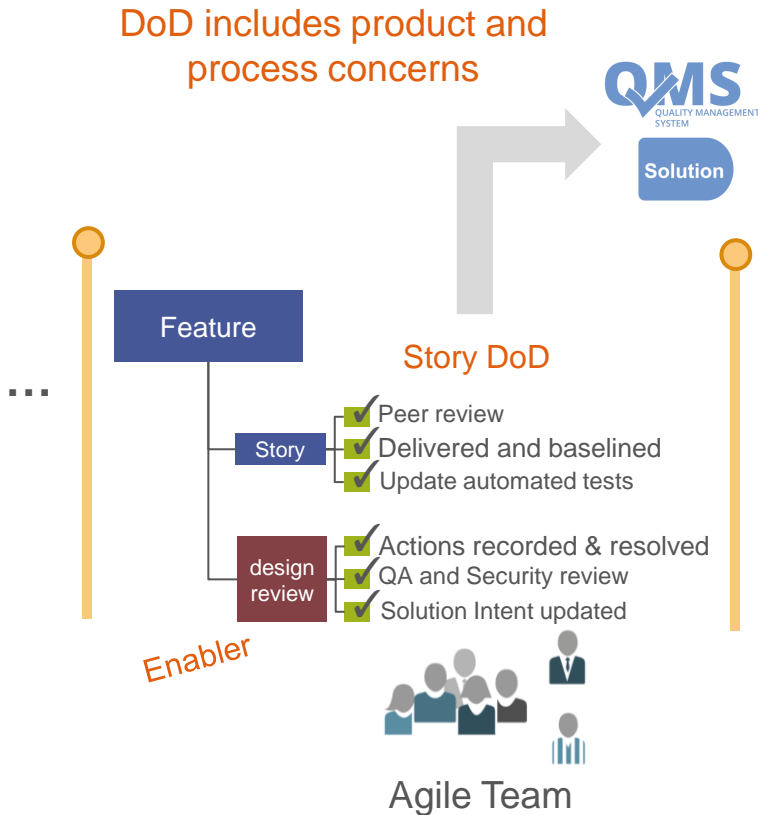
Apply continuous verification and validation

Solution Intent captures requirements and compliance info

Trace regulation to place it's implemented and tests that demonstrate it



Iteration verification

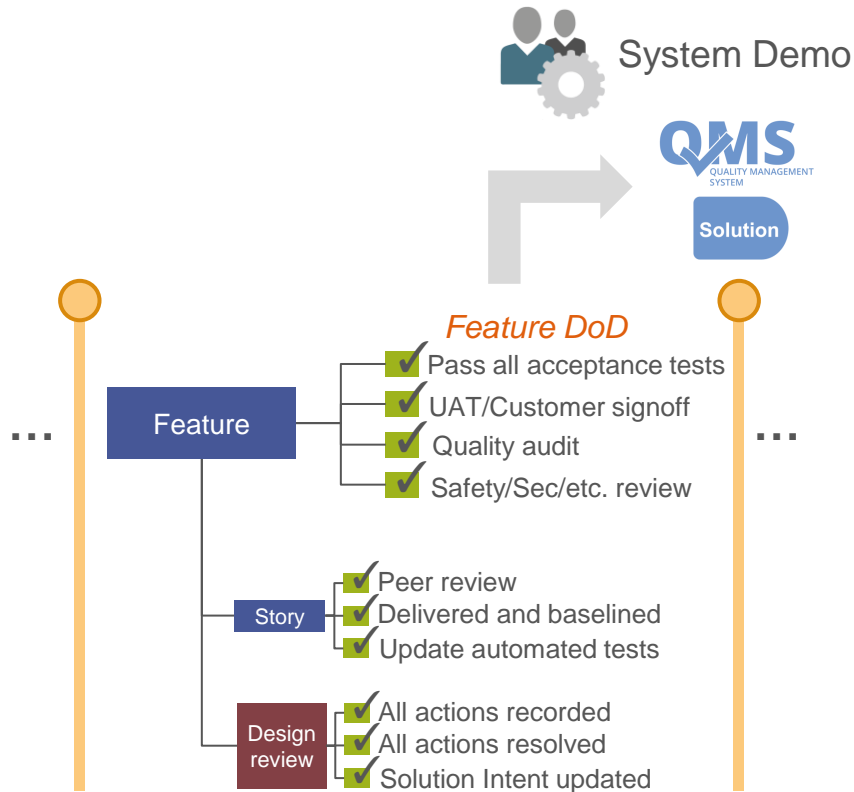


Continuous V&V for Team's work

- ▶ Peer review all engineering artifacts
- ▶ Deliver all artifacts to the common repository
- ▶ Reflect any discoveries or decisions in Solution Intent
- ▶ Test Solution with story acceptance tests (ideally automated)
- ▶ Ensure sufficient automation and/or compliance representatives to not bottleneck teams

Primarily development team responsibilities

Iteration validation



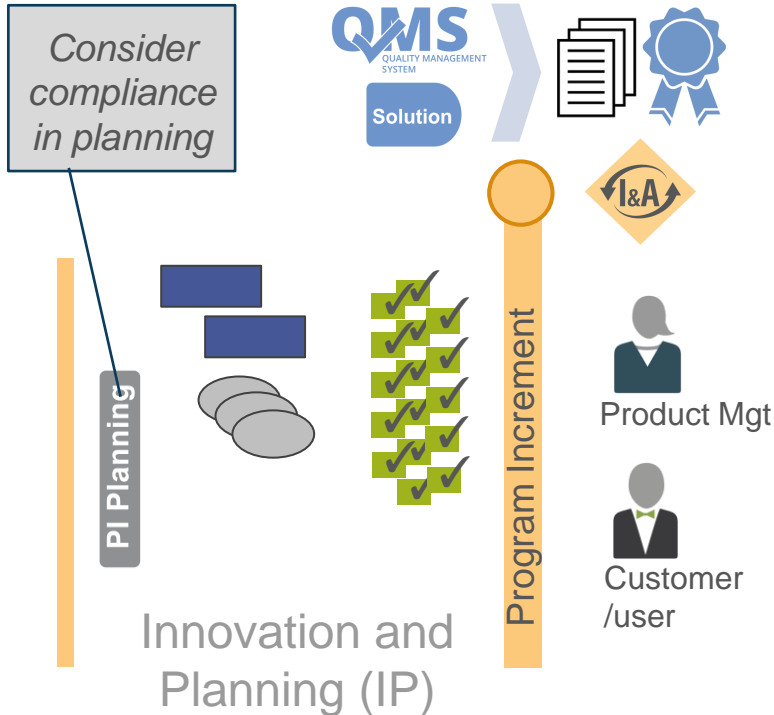
Evaluate full system increment

- ▶ Regression test all functional stories, NFRs, and feature acceptance tests
- ▶ Tested on end-to-end test environment
- ▶ User/Product Owner validation
- ▶ Update V&V tests
- ▶ Generate compliance docs and check progress towards acceptance

Development teams, system team and program shared V&V responsibilities

PI validation

Solution Demo



Evaluate full PI system increment

- ▶ Regression test all functional stories and feature acceptance tests
- ▶ User, PO, and PM validation
- ▶ NFR tests
- ▶ Assess progress of compliance information and documentation

**Program-based V&V responsibilities
(May require handoff to independent V&V)**

Summary

Build compliance into the system with SAFe

- ▶ Traditional QMS locks in waterfall development, and all its challenges – large batches, late feedback, slows flow
- ▶ SAFe provides lean-agile mechanisms to achieve compliance
- ▶ Results in a leaner, more efficient development which produces better outcomes, higher quality

Here's how...

- ▶ Build the solution and compliance incrementally
- ▶ Organize for value and compliance
- ▶ Build quality and compliance in
- ▶ Apply continuous verification and validation

Questions?