



A REPORT
TO THE
MONTANA
LEGISLATURE

INFORMATION SYSTEMS AUDIT

Strengthening Processes Related to IT Governance

Department of Administration

JUNE 2012

LEGISLATIVE AUDIT
DIVISION

11DP-13

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INFORMATION SYSTEMS AUDITS

Information Systems (IS) audits conducted by the Legislative Audit Division are designed to assess controls in an IS environment. IS controls provide assurance over the accuracy, reliability, and integrity of the information processed. From the audit work, a determination is made as to whether controls exist and are operating as designed. We conducted this IS audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our finding and conclusions based on our audit objectives.

Members of the IS audit staff hold degrees in disciplines appropriate to the audit process. Areas of expertise include business, accounting, information technology, computer science, mathematics, political science, and communications.

IS audits are performed as stand-alone audits of IS controls or in conjunction with financial-compliance and/or performance audits conducted by the office. These audits are done under the oversight of the Legislative Audit Committee which is a bicameral and bipartisan standing committee of the Montana Legislature. The committee consists of six members of the Senate and six members of the House of Representatives.

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June 2012

The Legislative Audit Committee
of the Montana State Legislature:

We conducted an Information Systems audit of IT Governance in Montana. The purpose of the audit was to evaluate the effectiveness of the Montana Information Technology Act (MITA) and the processes in place to govern information technology.

Overall, MITA provides an effective governance framework for Montana. However, we identified several areas where procedures could be changed to improve effectiveness. We wish to express our appreciation to the Department of Administration for their cooperation and assistance.

Respectfully submitted,

/s/ Tori Hunthausen

Tori Hunthausen, CPA
Legislative Auditor

TABLE OF CONTENTS

Figures and Tables.....	ii
Appointed and Administrative Officials	iii
Report Summary	S-1
CHAPTER I – INTRODUCTION AND BACKGROUND	1
Introduction	1
Audit Objective.....	1
Audit Scope and Methodologies	2
CHAPTER II – IMPROVING OVERSIGHT OF PROCESSES AND ACTIVITIES	3
Introduction.....	3
Overall Conclusion: MITA Has Improved IT Governance in Montana	4
Conclusion: MITA Has Improved Collaboration and Communication.....	4
MITA Provides Governance for IT Planning	5
Review of IT Activity.....	6
Conclusion: Not All IT Activity is Reported or Reviewed.....	6
MITA Defines the Planning and Reporting Processes.....	7
Increased Continuity Will Strengthen Processes.....	7
Department Review Does Not Lend to Continuity.....	8
Improving Continuity of Documentation.....	8
Insufficient Project Management Policy Limits Continuity.....	9
Statewide IT Policy	10
Policy Development Can Be Improved	10
DEPARTMENT RESPONSE	
Department of Administration	A-1

FIGURES AND TABLES

Figures

Figure 1	Information Technology Governance in Montana.....	3
Figure 2	Agency Views on MITA Effectiveness	4
Figure 3	Agency Reporting Based on Threshold	6

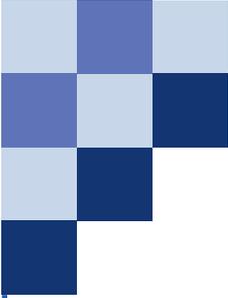
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 Dan Bucks, Director, Department of Revenue
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MONTANA LEGISLATIVE AUDIT DIVISION

INFORMATION SYSTEMS AUDIT

Strengthening Processes Related to IT Governance

Department of Administration

JUNE 2012

11DP-13

REPORT SUMMARY

The Montana Information Technology Act (MITA) provides the framework for IT governance. This law created the State Chief Information Officer position, which has the main responsibility for oversight of IT. For the 2011 biennium, agencies anticipated spending over \$259 million for IT projects. The need for effective governance for IT resources continues as more state resources are devoted to this area.

Context

The Montana Information Technology Act, Title 2, chapter 17, part 5, MCA, was implemented in 2001 to facilitate effective deployment of IT resources and clarify governance responsibilities. IT governance was assigned to the Department of Administration (DOA), which appointed a State Chief Information Officer (CIO) to implement MITA requirements.

The IT planning cycle is an ongoing process that incorporates development of plans and reporting on plan progress, both at the agency level and statewide. MITA includes provisions which require specific documents, the elements which should be included within those documents, and timeframes for completing the process. The four main documents are: 1) the State Strategic Plan, 2) agency IT plans, 3) agency biennial reports, and 4) the State Biennial Report. IT planning cycle documentation provides the basis for ongoing review of IT activities.

Results

MITA provides an effective governance structure for Montana. There are established processes and controls for key steps within

IT management. Roles and responsibilities have been defined and implemented. One area we reviewed involved advisory groups. These groups are an effective tool for improving IT governance through increased communication and collaboration.

While MITA defines the planning and reporting processes, we noted variations with the information reported in IT plans and reports. This results in a lack of continuity. Lack of continuity prevents the development of trends which is integral to monitoring the effectiveness of the development of IT resources. The department should strengthen its oversight to ensure planning and reporting is complete and consistent from year to year.

Monitoring the development of IT projects is an important aspect of governance. Development of an IT project starts with identification of a need, then progresses through several stages including definition, cost estimation, funding and appropriation, development, and finally implementation.

(continued on back)

Based on our audit work, there are numerous IT projects not reported because they fall under a certain dollar amount. As a result, the current process does not provide the department or the legislature with a comprehensive view of all IT activities.

Best practices recognize ongoing monitoring of a project is a critical component of development and a strategic part of IT governance. Current policy does not include any details or guidance on project management. Providing additional project management guidance, including reporting requirements for ongoing project management activity, will help increase continuity and ensure the ongoing health of IT projects.

MITA requires the department to establish and enforce statewide information technology policies and standards. As part of our audit work, we evaluated the effectiveness of DOA policy development. We noted several factors that contribute to confusion among agency personnel regarding statewide policies. We recommend the department formalize its policy development process.

Recommendation Concurrence	
Concur	3
Partially Concur	0
Do Not Concur	0
Source: Agency audit response included in final report.	

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Call toll-free 1-800-222-4446, or e-mail lad@mt.gov.

Chapter I – Introduction and Background

Introduction

The Montana Information Technology Act (MITA), Title 2, chapter 17, part 5, MCA, was implemented in 2001 to facilitate effective deployment of information technology (IT) resources and clarify governance responsibilities. IT governance was assigned to the Department of Administration (DOA). To address these responsibilities, DOA appointed a State Chief Information Officer (CIO) to manage the Statewide Information Technology Services Division (SITSD) and implement MITA requirements. The legislation enacting MITA also amended §5-12-205, MCA, adding duties to the Legislative Finance Committee (LFC) for monitoring the IT policies of DOA. MITA exempts the Montana University System, Office of Public Instruction, and National Guard from certain sections of the law. Each of these three entities has different levels of exemptions, but none of the three is exempt from all provisions within MITA. With few exceptions, this law has remained unchanged since its passage.

The need for effective governance for IT resources continues as more state resources are devoted to this area. The state currently operates over 400 IT systems which provide over 200 system supported services. According to the 2011 state biennial IT report, there were 283 sites housing 1,135 physical servers, which store and run applications. Agencies, via IT plans for the 2011 biennium, anticipated spending over \$259 million for IT projects including the development of new applications, purchase of new equipment, maintenance of older systems and equipment, and consolidation efforts.

Audit Objective

In 2005 our office performed an Enterprise IT Management audit (05DP-06) with a focus on the actions taken to implement MITA. That audit identified several issues and made recommendations in the following areas:

- ◆ Commitment to the execution of centralized management and control of IT
- ◆ Plans for addressing each section of MITA
- ◆ Maintaining IT policies/standards and ensuring agency compliance
- ◆ Coordinating with the Office of Budget and Program Planning on new IT investments

In 2007 we performed a follow-up to the Enterprise IT Management audit. We concluded DOA was implementing each of the recommendations, with the following items still under development:

- ◆ Policy on how to implement MITA
- ◆ Policies and procedures to ensure agency compliance
- ◆ Policy for agency IT planning

MITA has now been in place for 10 years in a rapidly changing IT environment. During that time, the department has continued to develop governance policies and procedures. This audit further examines the effectiveness of how this governance is working in light of statutory requirements. Our objective was to determine the effectiveness of current IT governance in Montana.

Audit Scope and Methodologies

Our work focused on the main processes used in governance including planning, boards/councils, policies, and review of projects/system development. Specific work included:

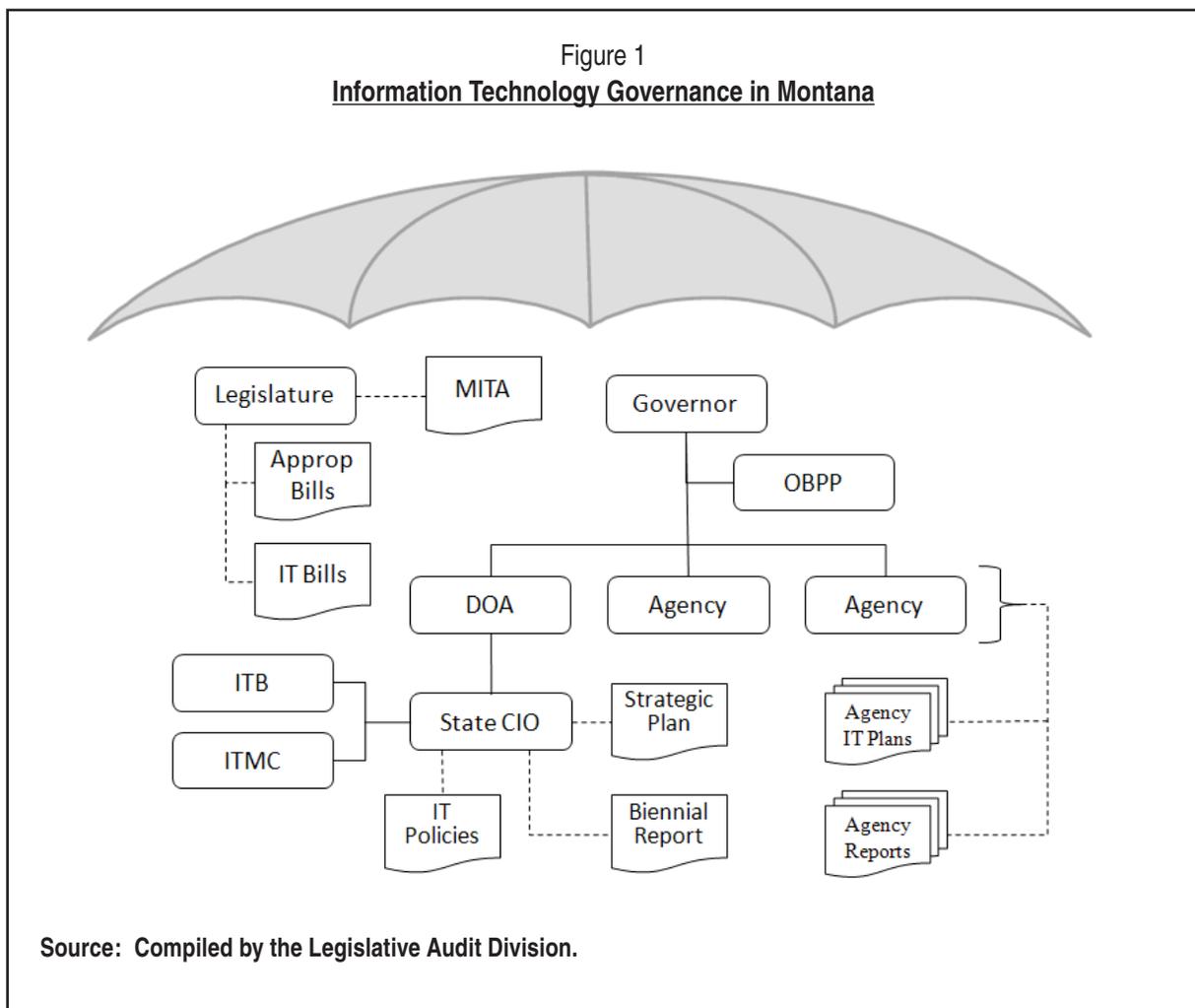
- ◆ Interviewing agency personnel.
 - ◇ DOA, Information Technology Board, Information Technology Managers Council, Legislative
- ◆ Conducting a survey of state agencies, universities, and elected officials.
 - ◇ Twenty-nine entities surveyed with 23 responses
- ◆ Reviewing and analyzing documentation associated with our focus areas.
 - ◇ Agency IT plans, project summaries, and biennial reports
 - ◇ State strategic plans and biennial reports
 - ◇ Session laws and associated hearing minutes
 - ◇ LFC meeting minutes and Legislative Fiscal Division reports
 - ◇ Other states' summary information
- ◆ Reviewing and analyzing laws, state IT policies, and related best practices.
 - ◇ Title 2, chapter 17, part 5 (MITA) and §5-12-205, MCA
 - ◇ Montana Operations Manual
 - ◇ Control Objectives for Information and related Technology (COBIT)
- ◆ Analyzing past audit reports.
 - ◇ Audit reports issued in the past five years

Audit work was conducted in accordance with Government Auditing Standards published by the United States Government Accountability Office.

Chapter II – Improving Oversight of Processes and Activities

Introduction

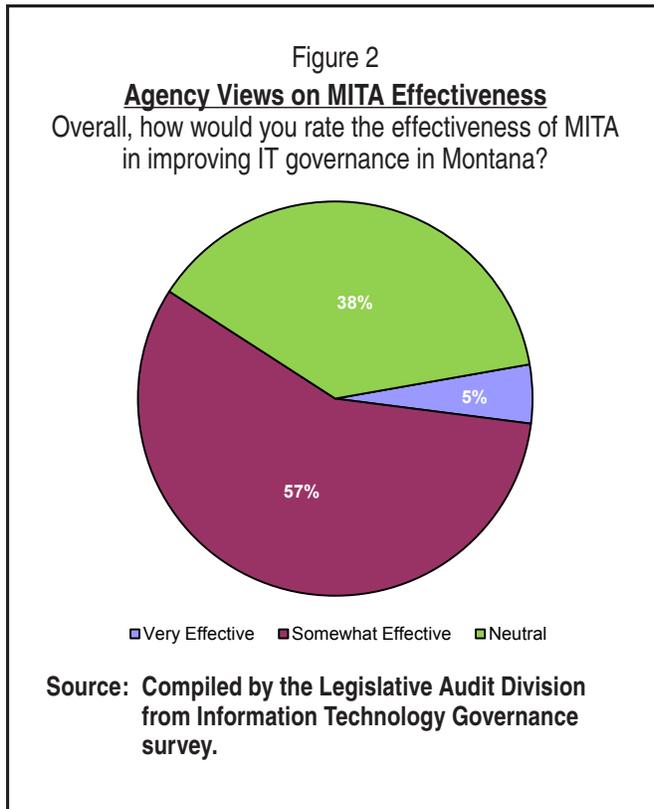
Governance can include everything from establishing processes for guiding activities, to monitoring how activities are conducted, to ensuring standards are being met. In Montana, there are several components of information technology (IT) governance. The Montana Information Technology Act (MITA) assigns primary governance responsibility to the Department of Administration (DOA). The following figure depicts the current IT governance structure for state government.



The law also creates the state Chief Information Officer (CIO) position and outlines three main duties including carrying out duties as assigned by the Director, serving as the chief IT policy advisor to the Director, and advising the Director on enforcement. The law creates the Information Technology Board (ITB) which functions in an

advisory capacity. In addition, the bill that enacted MITA gave the Legislative Finance Committee (LFC) oversight responsibilities regarding IT related activities.

We examined the roles and responsibilities within this governance structure to determine the effectiveness of processes.



Overall Conclusion: **MITA Has Improved** **IT Governance** **in Montana**

We conclude MITA provides an effective governance structure for Montana. There are established processes and controls for key steps within IT management. Roles and responsibilities have been defined and implemented. In addition, our survey of state agency IT personnel indicates agencies have a positive position on the effectiveness of MITA. Figure 2 shows agency views on the overall effectiveness of MITA.

Conclusion: MITA Has Improved **Collaboration and Communication**

Section 2-15-1021, MCA, requires the creation of an Information Technology Board and MITA establishes its responsibilities. The board is responsible for advising the department in numerous areas including:

- ◆ Enterprise IT policy.
- ◆ State strategic IT plan.
- ◆ Major technology budget requests.
- ◆ Rates charged by the department for IT services.

In addition to ITB, the department has created a number of other groups designed to improve collaboration and communication for IT governance. These groups include, among others, the Information Technology Managers Council (ITMC), Network

Managers Group, and Project Management Office Advisory Group. ITMC is to advise the department to help improve management of data and IT resources through discussion of issues, analysis of opportunities, and sharing of ideas. The ITB is the main group for providing advice from a business perspective, whereas ITMC is the main group for providing advice from a technical perspective.

We reviewed the implementation of these groups to determine their effectiveness in improving IT governance in Montana. Our work consisted of interviewing current and former members of both ITB and ITMC, observing group meetings and reviewing past minutes, interviewing SITSD management, and surveying state agencies. Overall, we noted these groups are an effective tool for improving IT governance. The primary benefit of these groups is increased communication and collaboration.

MITA Provides Governance for IT Planning

An essential component of MITA is the planning cycle. This cycle is an ongoing process that incorporates development of plans and reporting on plan progress, both at the agency level and statewide. MITA includes provisions which require specific documents, the elements which should be included within those documents, and timeframes for completing the process. DOA has developed additional timeframes and rules which govern the process in more detail.

Within the IT planning cycle, there are four documents required by statute:

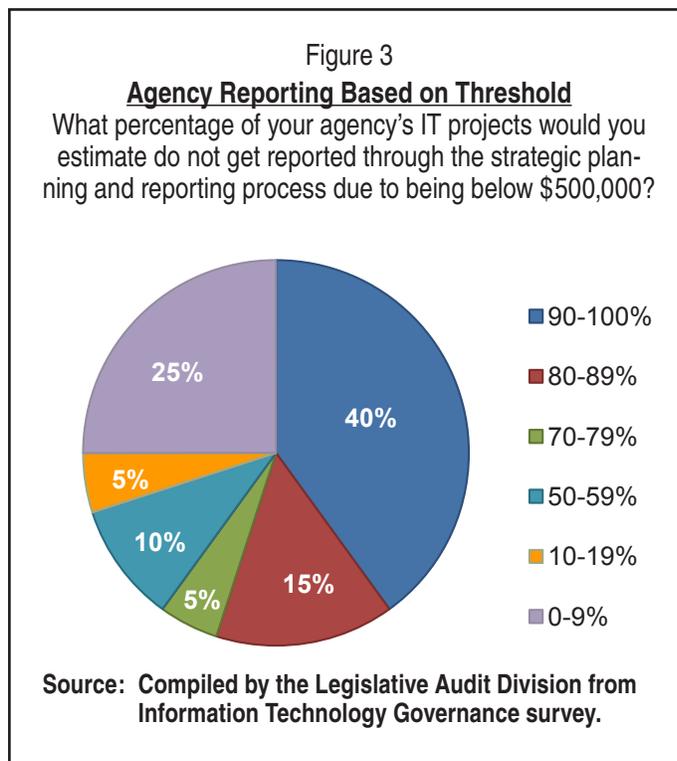
- ◆ **State Strategic Plan for IT:** DOA is required to develop a State Strategic Plan for IT to establish “the statewide mission, goals, and objectives for the use of information technology” and “the strategic direction for how state agencies will develop and use information technology resources to provide state government resources.”
- ◆ **Agency IT Plans:** Executive branch agencies are to develop their own individual IT plans. Statute provides further guidance on content of IT plans including the agency mission, goals, and objectives for IT.
- ◆ **Agency Biennial IT Reports:** Agencies are required to develop an agency biennial report evaluating progress toward their agency IT plan goals and objectives.
- ◆ **State Biennial IT Report:** DOA is required to develop a State Biennial IT Report, based on agency IT plans and performance reports, analyzing the IT environment and reporting on progress and performance.

These four deliverables form one iteration of the continuous planning cycle. This iterative process occurs within an 18-month timeframe and was developed to coincide with the state budget and appropriations process. MITA requires each agency IT plan to project activities and costs over a six-year time period.

Review of IT Activity

Monitoring the development of IT projects is an important aspect of governance. Development of an IT project starts with identification of a business need. The project then progresses through several stages including definition, cost estimation, funding and appropriation, development, and finally implementation.

Section 2-17-526(1)(b), MCA, states SITSD and OBPP are to jointly determine the criteria for classifying major IT projects. Currently, all IT projects estimated at \$500,000 or more are considered major projects. Our survey indicated 70 percent of the agencies who responded have less than half of their IT projects reviewed because they do not exceed the threshold.



Furthermore, 40 percent of the respondents said that 90 to 100 percent of their projects do not get reported. Figure 3 shows the breakdown of reporting based on the current threshold.

In addition to not exceeding the \$500,000 threshold, there are other reasons agencies may not report IT activity. These include agencies not reporting a project because they do not require funding through the Long-Range IT Planning Program, agencies

underestimating the cost of a project, and agencies separating a larger project into a series of smaller projects that all fall under the threshold.

Conclusion: Not All IT Activity is Reported or Reviewed

Based on our audit work, there are numerous IT projects not reported because they fall under the threshold. The state CIO provides a project portfolio report to the LFC on a quarterly basis. This project portfolio report includes all major projects (those over \$500,000). The LFC recognized a need to expand the criteria for what projects to review, as well as providing more detail and clarity to the report in order to “adequately capture IT development within state government.” The LFC indicated the criteria do

not capture sizeable investments being made in IT within base budgets and do not contain any post implementation operational costs. This unreported IT activity is not summarized or presented in any reports. In addition, not all IT activity is reviewed by the state CIO or oversight entities. As a result, the current process does not provide the department or the legislature with a comprehensive view of all IT activities.

MITA Defines the Planning and Reporting Processes

We selected a sample of seven state agencies representing a range of sizes and business processes and reviewed all agency IT plans and biennial reports developed since MITA's inception. We then evaluated the sample, along with the state plans and biennial reports for the same time period, to determine the types of information maintained from agency to agency and from year to year. We identified goals and objectives, as well as proposed projects contained in each of the plans and reports and compared them from one planning cycle to the next. We also evaluated the department's guidance for completing plans and reports, as well as its review of proposed IT projects.

Increased Continuity Will Strengthen Processes

Our review determined there are inconsistencies and incompleteness with the information reported in plans and reports both by agency and from one biennium to the next. We noted variations:

- ◆ Types of information reported
- ◆ Amount of information reported
- ◆ Amount of detail included
- ◆ Methods for reporting goals and objectives

Specifically, we reviewed the IT plan templates provided by the department and noted variations with the information reported by agencies. We also noted approved plans with blank template sections. Furthermore, the level of detail agencies included in the IT plan templates varied between agencies and from biennium to biennium within the same agency. State biennial reports did not always reflect the information contained within the agency biennial reports. Subsequent plans and reports do not consistently contain details on progress to date, changes in estimated costs or projected timelines, or actual expenditures. In some cases, projects were not contained in subsequent plans and reports, yet the projects were still in development and had not been completed. Therefore, we were unable to track the continued progress and development of IT projects. The lack of continuity weakens IT oversight.

An example of this lack of continuity occurred at one agency beginning with the 2002 planning cycle. The agency included a database project in its list of IT objectives. The

original cost estimate for the project was \$150,000 with an estimated timeframe of four months to complete. No subsequent plan or biennial report includes the database. However, the project continued to be developed and was completed in 2010, seven years beyond the initial estimation. In addition, while the project was initially overestimated, the final cost exceeded \$237,000, which is 158 percent of the original budget estimate. Had this project been tracked throughout the entire development process by inclusion within the agency's IT plans and reports, including changes in costs and timelines, IT governance oversight functions may have been able to assist in earlier implementation and possibly avoiding cost overruns.

Department Review Does Not Lend to Continuity

The department's review process includes a template for completing agency IT plans and review of the information reported. The department provides a template with accompanying instructions for development of agency IT plans. According to department guidance, MITA requirements mandate the need to collect common IT information from all agencies, and as a result, each agency is required to develop their plan in a consistent format, with specified content, based upon the information requirements derived from MITA. In addition, department guidance indicates the agency plan should reflect an update of the six-year projection of information technology implementation planning, and that each IT goal and its associated objectives and measures should be uniquely identified and numbered sequentially. However, the template and instructions do not help ensure continuity because they only focus on a single biennium.

According to MITA, agency IT plans are to conform to the goals and objectives outlined in the State Strategic Plan, which is the primary basis for the department's evaluation of the information reported in agency IT plans. Draft agency IT plans are reviewed by specific sections within SITSD, emphasizing areas such as network, e-government, data center, or contracts. The review is intended to identify any potential concerns. Recommendations are then forwarded to the state CIO for approval or denial. When submitting IT plans, agencies are required to list all proposed IT projects that are over \$500,000. The department also reviews these major projects as part of the budget review process. Again, the department's review does not help ensure continuity from one biennium to the next because the focus is on a single cycle.

Improving Continuity of Documentation

Lack of continuity prevents the development of trends over time both within individual agencies and statewide. Development of trends within agency IT plans and the State Strategic Plan, as well as biennial reporting on progress, is integral to the effectiveness of the continuous planning cycle. While the department is required by

MITA to review and approve agency IT plans, and to report on the performance of those plans, the specific requirements enumerated in statute do not address continuity. The department should strengthen its oversight to ensure planning and reporting is complete and consistent from year to year.

RECOMMENDATION #1

We recommend the Department of Administration modify its agency information technology plan template and review process to ensure completeness and continuity.

Insufficient Project Management Policy Limits Continuity

Best practices recognize ongoing monitoring of a project is a critical component of development and a strategic part of IT governance. The state CIO implemented a project management policy on March 1, 2011 requiring agencies to follow the American National Standards Institute, Project Management Institute's Guide to the Project Management Body of Knowledge (PMBOK). However, this policy does not include any details or guidance on project management, including what projects should follow PMBOK, how to manage activities, how and when to report on project status during development, or reporting requirements after implementation. As a result, guidance regarding project management is limited, which impacts the ability to track progress of IT activity from conception through implementation.

On a quarterly basis, the state CIO presents the status of ongoing major projects to the LFC. The data provided is a project summary and does not include details regarding the complexities of developing an IT project. The LFC recently requested a major project post-implementation report for its quarterly meetings, which the state CIO is now providing. While the actions of the state CIO and the LFC provide increased oversight of projects, agency guidance and requirements for project management is limited. Providing additional project management guidance, including reporting requirements for ongoing project management activity, will help increase continuity and ensure the ongoing health of IT projects. Detailed policy guidance will help improve the comprehensiveness of oversight reporting, which will assist in validating estimated benefits and costs, and document effective project management practices for future use.

RECOMMENDATION #2

We recommend the Department of Administration expand project management policy guidance and reporting procedures for state agencies.

Statewide IT Policy

Section 2-17-512(1)(e), MCA, states the department shall “establish and enforce statewide information technology policies and standards.” The department has implemented a number of statewide IT policies, standards, and guidelines to meet this requirement. According to SITSD definitions:

- ◆ Policies are required courses of action or sets of requirements to be followed with respect to the acquisition, deployment, implementation, or use of IT resources.
- ◆ Standards are requirements or specifications for acceptable software, hardware, database, technical approach, business process, or methodology.
- ◆ Guidelines are recommended actions used to guide the use and deployment of IT.

Agencies are required to follow policies and standards, but guidelines are not mandatory.

As part of our audit work, we evaluated the effectiveness of DOA policy development by reviewing current policy structure and location, past and current policy development procedures and best practices, and interviewing SITSD staff and surveying agency personnel.

Policy Development Can Be Improved

The department follows its described policy development process. However, there are aspects of the development process which make policies difficult to use or to easily identify for the end user. The naming of and duplication between documents does not lend to ease of use. There are multiple policies with names which are similar or which are difficult for a user to distinguish between different subjects. Other policies are located in different sections, yet cover the same subject area.

In addition to confusion over policy topics, policies are currently developed and released whenever proposed. We noted a recent example of a draft policy being released, then retracted, and is now being considered for release again at a later date. With no defined schedule for updating policies, users have difficulty tracking policy updates or changes.

All of these factors have contributed to confusion among agency personnel. Audits conducted by our office have identified noncompliance in several policy areas including access, change management, and data integrity. While the reasons for noncompliance varied, some related to lack of knowledge and/or understanding of policy.

SITSD acknowledges concerns with the current structure of IT policies. However, the department does not have a formalized policy development process. Best practices suggest the relevance of policies should be confirmed and approved regularly.

RECOMMENDATION #3

We recommend the Department of Administration clearly delineate information technology policies and formalize a systematic policy development process.

DEPARTMENT OF
ADMINISTRATION

DEPARTMENT RESPONSE

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May 30, 2012

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RE: Information Systems Audit #11DP-13: Strengthening Processes
Related to IT Governance

Dear Ms. Hunthausen:

The Department of Administration has reviewed Audit #11DP-13: Strengthening Processes Related to IT Governance. The Department's responses to the recommendations are below.

Recommendation #1

We recommend the Department of Administration modify its agency IT plan template and review process to ensure completeness and continuity.

Response: Concur.

The Department will continue its work to update the IT Plan template, clarify instructions, and review criteria to ensure planning and reporting is complete and consistent from one biennium to the next.

Recommendation #2

We recommend the Department of Administration expand project management policy guidance and reporting procedures for state agencies.

Response: Concur.

The Department will continue to work to expand project management policy guidance and reporting procedures. The Department expects to complete its work developing a Project Management Standard by July 1, 2012.

Recommendation #3

We recommend the Department of Administration clearly delineate information technology policies and formalize a systematic policy development process.

Response: Concur.

The Department is currently clarifying and streamlining all policy documents, including a restructure of its formalized policy development process.

We appreciated the hard work and careful examination that you and your staff provided during this audit. Our department always looks upon the audit process as an opportunity to improve our operations and performance.

The Department's Corrective Action Plan (CAP) is enclosed.

Sincerely,



Janet R. Kelly, Director
Department of Administration

Enclosure

Preliminary Response
Corrective Action Plan: Audit Report #11DP-13
Strengthening Processes Related to IT Governance
Department of Administration
June 1, 2012

Agency	Recommendation #	Does this affect a federal program?	CFDA # (if previous YES)	Management View	CAP – Corrective Action Plan	Person responsible for CAP	Target Date
61010	Recommendation #1 We recommend the Department of Administration modify its agency IT plan template and review process to ensure completeness and continuity.	No		Concur	The Department will continue its work to update the IT Plan template, clarify instructions, and review criteria to ensure planning and reporting is complete and consistent from one biennium to the next.	Tammy LaVigne	Jan 1, 2014
61010	Recommendation #2 We recommend the Department of Administration expand project management policy guidance and reporting procedures for state agencies.	No		Concur	The Department will continue to work to expand project management policy guidance and reporting procedures. The Department expects to complete its work developing a Project Management Standard by July 1, 2012.	Tammy LaVigne	July 1, 2012
61010	Recommendation #3 We recommend the Department of Administration clearly delineate information technology policies and formalize a systematic policy development process.	No		Concur	The Department is currently clarifying and streamlining all policy documents, including a restructure of its formalized policy development process.	Pat Boles	Nov 1, 2012