

LEGISLATIVE AUDIT DIVISION

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MEMORANDUM

TO: Legislative Audit Committee Members
FROM: Amanda Saylor, Information Systems Auditor
DATE: April 2016
CC: Mike Batista, Director, Department of Corrections
RE: Information Systems Audit Follow-Up (16SP-06): Offender Management Information System (13DP-04)
ATTACHMENTS: Original Information Systems Audit Summary

Introduction

The *Offender Management Information System* (13DP-04) report was issued to the committee in August 2014. The audit included six recommendations to the audited agency. In September 2015, we conducted follow-up work to assess implementation of the report recommendations. Based on the initial responses from Department of Corrections (department), we postponed the follow-up to February 2016. This memorandum summarizes the results of our follow-up work.

Overview

Our review of the *Offender Management Information System* (OMIS) within the department identified areas that needed to be defined, addressed, and strengthened. The audit report contained six recommendations for creating policies and procedures, defining and improving standards, and strengthening controls within OMIS. The agency concurred with all of the recommendations and is currently working to implement them. The department is currently upgrading to a new version of OMIS, which is allowing them to better address the recommendations and update previous practices. The department released the first OMIS module on April 4, 2016, and anticipates a full migration by July 2016. The department plans to implement additional enhancements of OMIS, specifically sentencing calculations and Offender Legal Management Center, in December 2016.

Background

OMIS is used by the department to collect and track adult offender data and produce reports for users and requesting groups. All offenders, whether on probation, incarcerated, or out on parole, are entered in OMIS. The objective of the audit was to determine if system controls are functioning as expected to enhance data integrity. The audit examined how offender information is entered and tracked throughout an offender's entire time under the supervision of the department. We examined input controls that support data accuracy, security, and completeness. We also analyzed processes for consistency among users entering information into OMIS. We reviewed controls around the output of data to evaluate whether or not the information was consistent throughout the reporting process. Based on the audit work performed, the department established controls over OMIS; however, controls could be strengthened in certain areas in order to increase the level of integrity of offender data.

Audit Follow-Up Results

The following sections summarize the progress toward implementation of the report recommendations. Audit staff met with the Information Technology (IT) Administrator and key department personnel to review what work had been done to complete implementation. Various policy, procedure, and template documents were reviewed as well. Additionally, training modules and documentation were evaluated and tested.

RECOMMENDATION #1

We recommend the Department of Corrections implement a plan to:

- A. Make the Offender Management Information System the official record.**
- B. Minimize the use of hardcopy documentation.**
- C. Create an electronic records management process for maintaining existing hardcopy documentation within the Offender Management Information System.**
- D. Address data integrity issues noted during the audit.**

Implementation Status – Being Implemented

While the department created an initial Project Management Charter outlining the requirements to facilitate the recommendation, the department is currently in the process of enacting the charter. The charter includes a timeline from August 2014 to August 2019, which aligns with the department's initial response to the audit. The charter also provides brief overviews of committees and subcommittees to be created in order to address the recommendations including but not limited to an OMIS Governance Committee, Data Governance Committee, and an OMIS Policy Committee. Timelines related to the establishment of these committees are generally March 2016. However, during follow-up audit work we identified committees have not yet been officially established. While key department personnel (leadership and directors) indicated initial discussions have begun that entail who may be included in each committee and the purpose of each committee, turnover in staff and other priority driven projects have delayed them from significantly moving forward with the committees outlined in the charter.

The department has taken steps in assuring data integrity issues are addressed and managed by limiting free form entry into OMIS, locking down critical information after a short period of time, creating an option for reporting errors within OMIS, providing a data quality policy, and establishing internal audit guidelines. Since the audit, department staff indicated the number of personnel with data entry capability has been reduced from 200 to 16 staff members. The department is developing a governance policy along with a proposal to establish a central, formalized record-keeping office to limit the amount of users who enter data into OMIS. The department is also implementing the Offender Legal Records Management Center module. The module will provide an official location to enter and manage data to ensure data integrity is being met throughout the department as well as other enhancements to address other concerns provided in the audit. The department anticipates a full implementation in August 2019. Since the department is transitioning multiple decentralized stakeholders including Montana State Prison, Probation and Parole Division, and Montana Women's Prison, this timeframe does not appear to be unreasonable.

RECOMMENDATION #2

We recommend the Department of Corrections implement policy to correlate process ownership with data entry for all information entered into the Offender Management Information System.

Implementation Status – Being Implemented

The department is currently in the process of implementing an upgraded version of OMIS, where they will have additional functionality and modules. Because of this upgrade, the department is creating module definition documents that properly reflect the upgrade. According to department personnel, the module definition documents will clearly outline data owner, domain, and data stewards in addition to all possible security levels for accessing data specific to that module. The document also presents the selections available from option menus including descriptions, classifications, special behaviors, and notes associated with the selection. As the upgrade of OMIS is implemented, module definition documents will follow.

RECOMMENDATION #3

We recommend the Department of Corrections use the Offender Management Information System to calculate all offender sentence terms.

Implementation Status – Being Implemented

In the original audit, we identified offender sentence terms were being calculated in excel spreadsheets. The department is working on the implementation of a new module in OMIS, referred to as the Offender Legal Records Management Center. The initial release of the center will only contain court case information as a data entry field; however, the second release of the center will contain the ability to calculate sentences for those offenders new to the department. According to department personnel, the next step is to develop a plan to go back to historical and seasoned offender records to update sentence terms in the center and the upgraded OMIS using various code and rules to apply the dates. During follow-up work, we reviewed various OMIS documentation and business files within the department. Some of this documentation includes sentence calculations within the center; however, the department will continue to input sentence calculations in spreadsheets until the center is fully implemented and a plan for historical data is set in place. The anticipated release of the center is June 2016, with a full implementation including sentencing calculations by December 2016.

RECOMMENDATION #4

We recommend the Department of Corrections improve its training plan and written reference materials to assist users with operations of the Offender Management Information System.

Implementation Status – Being Implemented

The department has taken various steps improving its training system. The department has an Online Training Center where there are several videos and manuals related to OMIS. During our follow-up work, we tested and attended the various trainings pertinent to OMIS and the new version of OMIS. With this review of the Online Training Center, we identified a thorough and comprehensive support system that proves as adequate training materials and plans for new users, however the center is not a required training for new employees and training is not consistent within the department. Additionally, with the new version of OMIS implementation, there is some movement with updated training documentation but they do not have a complete transition plan in place.

RECOMMENDATION #5

We recommend the Department of Corrections:

- A. Develop additional security roles to further define user access rights based on job function.**
- B. Incorporate into its existing process for assigning rights, requirements for removing any existing rights before assigning new rights.**

C. Develop written procedures for granting security access including ongoing monitoring to ensure proper procedures are followed and user access is based on a least privileged assignment.

Implementation Status – Being Implemented

According to the Information Security Policy provided by SITSD, each agency is responsible for creating, implementing, and maintaining security access. The department has begun developing security roles to further define user access rights, however the department has yet to create a general departmental policy and procedure outlining the general rules for assigning rights, removing existing rights and assigning new rights, and an overall review process for monitoring least privileged assignment. Although the department is working towards developing an overarching policy addressing security procedures, there is a lack of resources and a general lack of authority over which department will be responsible for the ongoing monitoring of security access, assigning rights, and maintenance over policy and procedure. They have yet to address general security access matters such as changing or terminating access, remote or guest access, temporary position change access, or enforcement and regular review processes.

RECOMMENDATION #6

We recommend the Department of Corrections formalize its backup and recovery plan for the Offender Management Information System via written policy and procedures.

Implementation Status – Implemented

Due to state IT policy and procedures requiring agencies to follow mandated disaster recover capabilities, the department created and implemented Montana Department of Corrections Disaster Recovery Plan in April 2015. The plan appropriately follows SITSD policy.