

# DEPARTMENT OF NATURAL RESOURCES AND CONSERVATION

Water Resources Division

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## STATE OF MONTANA

June 1, 2023

Legislative Audit Committee  
State Capital Building Rm 160  
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Helena, MT 59620-1705

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LEGISLATIVE AUDIT DIV.

Members of the Legislative Audit Committee:

The Department of Natural Resources and Conservation (DNRC) appreciates the opportunity to update the Legislative Audit Committee on the Performance Audit of the Data Quality in the Water Rights Information System (21P-01). Below is a summary of the Legislative Audit Committee's recommendations to the Water Resources Division, and the actions the DNRC's Water Resources Division has taken in response to these recommendations.

### RECOMMENDATION #1

The Department of Natural Resources and Conservation (DNRC) establish and implement a data quality strategy for the Water Rights Information System (WRIS) that defines desired levels for data quality that are regularly evaluated.

Actions completed as of June 2023:

- DNRC implements a two-person review for all data entry in the WRIS and the database currently has built-in quality control checks.

Future actions:

- DNRC will evaluate additional areas where data quality is lacking and where improvements can be made, to create a Data Quality Strategy for the WRIS by April 2024, which will include:
  - Testing and analyzing the validity of core data within the WRIS.
  - Developing strategies to address legacy data quality issues (e.g., customer verification).
  - Identifying ways to continue to ensure high data quality (e.g., database input rules).
  - Developing periodic statistical analysis of the data to ensure long-term quality.
- DNRC will begin to implement the Data Quality Strategy in 2024.

### RECOMMENDATION #2

The Department of Natural Resources and Conservation establish an ongoing process for outreach and education including A) Developing professional relationships with title companies and realtors to facilitate greater understanding of water right processes and information; and B) Developing a system for owners to

sign up for regular reminders regarding their water right information.

#### Actions completed as of June 2023:

- DNRC has taken the existing model of training provided to title companies and realtors by the Kalispell Regional Office and implemented this training throughout the State (2022/23).
- DNRC has redesigned its website to be better organized, provide clearer information, and identify resources for water users.
- DNRC created a water listserv for water rights owners and stakeholders, to increase outreach and allow users to sign up to receive notification when important meetings or changes are coming out related to water rights.
- The DNRC created a Water Planning, Implementation, and Communications Bureau which will ensure continued improvement in stakeholder communication and education.

#### Future actions:

- DNRC will create an online form for water right owners to update their address more easily and efficiently (July 2024)
- DNRC will work with the Department of Revenue (DOR) to compare DOR and WRIS addresses to identify any inaccuracies. DNRC will then contact water right owners to request they update their address (2024).
- DNRC will work with water user groups to encourage water rights owners to check the information on their water rights, including mailing address, to ensure that water rights are up to date (2024).
- DNRC will develop a customer portal to collect all DNRC customer contact information and build targeted mailing lists based on customer interests (2026).

### RECOMMENDATION #3

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The Department of Natural Resources and Conservation establish the Water Rights Information System (WRIS) as the official record and transition to electronic processes by A) Ensuring historical documents are scanned at acceptable quality; B) Creating online forms for all applications and updates; C) Tracking owner contact information electronically such as e-mail address, phone number, etc.

#### Actions completed as of June 2023:

- The DNRC has clarified with all staff that Water Rights Information System is the official record.
- The DNRC confirmed that each workstation is set to scan historical documents at 300 dpi (an acceptable quality as determined by the National Archives and Records Association) and will continue to maintain this standard.
- The DNRC deployed a new WRIS internal interface in April of 2022. Entry of owner electronic contact information was made a priority in this new interface and staff have been encouraged to enter this information whenever it is available.
- DNRC has taken an inventory of all current forms and determined priority for digital conversion.

#### Future actions:

- Historic scanned documents will be rescanned when maps are found of poor quality by DNRC, Water Court, or public (ongoing).
- DNRC will develop processes to integrate priority online forms into the existing WRIS and build in data quality assurance checks (Spring 2026)
- DNRC will integrate its digital form submission into the DNRC customer portal (Spring 2026)

## RECOMMENDATION #4

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The Department of Natural Resources and Conservation make scanned documents and their processes more functional by A) Establishing an electronic means to transfer documents for upload, both internally and from the Water Court; and B) Attaching additional labelling and identifying information to uploaded documents.

### Actions completed as of June 2023:

- The DNRC has reviewed the current records management process and is exploring best management practices to facilitate electronic transfer of documents without compromising quality and accuracy of record.
- The DNRC has established a list of scanned label options that could be implemented to better identify uploaded documents.

### Future actions:

- The DNRC will work with SITSD to evaluate existing and needed technology and software and develop a plan to transition to a fully digital record that allows for the establishment of metadata, labeling, and identifying information (December 2024).
- DNRC records unit and regional offices will be trained in scanning documentation and will implement a new system by December 2025.
- The Water Court uploads their case files to FullCourt, which is a subscription-based software used for managing court cases. DNRC will work with the Water Court to integrate Water Court files or provide direct links in the WRIS (initiate conversation in December 2025).

## RECOMMENDATION #5

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The Department of Natural Resources and Conservation integrate GIS functionality for stakeholders by A) Introducing a map interface for electronic applications and queries; and B) Using additional identifiers for the place of use and point of diversion.

### Future actions:

- The DNRC is in the process of developing a new Water Rights Query System (WRQS) which will provide map-based functionalities and will (phase 1 completion September 2023):
  - Replace the current WRQS while offering improved user experience and accessibility.
  - Develop a simple water right map-making application for application submission.
  - Develop a water right application status and signup tool, providing an efficient means of communication between DNRC and the public on their water right applications.
  - Customize the public-facing Geographic Information System (GIS) application.
- DNRC will evaluate adding additional geospatial functionality for the WRIS based on recommendations from the Comprehensive Water Review Stakeholder Working Group (beginning August 2023).

We want to thank you for this comprehensive audit as well as the opportunity to provide you with an update regarding the continued improvement of our processes and services for stakeholders and Montanans.

Sincerely,



Anna Pakenham Stevenson  
DNRC Water Division Administrator