

September 24, 2021

RECEIVED
September 27, 2021
LEGISLATIVE AUDIT DIV.

Mr. William Soller, Deputy Legislative Auditor Legislative Audit Division PO Box 201705 Helena, MT 59620-1705

Re: Follow-up to Security and Maintenance of Montana Election Systems Audit (19DP-06)

Dear Mr. Soller,

The Office of the Secretary of State is in receipt of your letter dated September 8, 2021, requesting an update on the progress of implementing the recommendations in the information systems audit titled, Security and Maintenance of Montana Election Systems (19DP-06), which was issued to the Legislative Audit Committee in August 2020. The progress regarding each recommendation is noted below.

- Recommendation #1: Using industry standards and best practices, the Montana Legislature should define the scope of election security and mandate assessments at the local levels.
 - Implemented: The Montana Legislature passed HB 530 (Require secretary of state to adopt rules governing election security) to address the scope of election security and mandate assessments at the local levels.
- **Recommendation #2**: SOS should align the definition of election security within rule with statute and provide further guidance on necessary security measures.
 - Being Implemented: SOS is currently drafting rules as required by HB 530. These rules, which will define election security and will provide guidance on security measurements, are currently being drafted with careful consideration of statute, election best practices, National Institute of Standards and Technology security controls, federal recommendations, and county resources and size.
- Recommendation #3: SOS should enhance the grant management program, including implementing measurable objectives, goals, and timelines while ensuring ongoing evaluation is occurring to measure success.
 - Being Implemented: SOS hired an Accountant in January 2021 with previous grant experience and is currently working on enhancing the grant management program in line with the recommendations.

- Recommendation #4: SOS should fill the vacant Information Security Manager position to
 ensure both election security and agency-wide security have consistent, independent, and
 comprehensive oversight.
 - Implemented: SOS hired an Information Security Manager in February 2021 to ensure both election security and agency-wide security have consistent, independent, and comprehensive oversight.
- Recommendation #5: SOS should implement between a state-level maintenance program to address timeliness and verification of voter status updates in the voter registration database.
 - Being Implemented: SOS is in the process of finalizing development of a state-level program to monitor the timeliness of voter status updates being completed in the Election Management system. After deployment of the new Election Management system in January 2022, SOS plans to explore enhancements to the program through automation in the new system.

Please let us know if you have questions.

Sincerely,

Christi Gacolson
Christi Jacobsen

Montana Secretary of State