STATUS OF IMPLEMENTATION – AUDIT SERVICES DIVISION REPORT RECOMMENDATIONS

Audit Report Title: Planning is Needed to Fully Implement Data Governance at Milwaukee County

File Number:	23-600	**Audit Issued:**	May 2023
Status Report Date:	February 2025	**Department:**	Information Management Services Division

Open Recommendations
None

Newly Closed Recommendations

Recommendation #3	
Recommendation - May 2023 *IMSD should evaluate items within its Master Service Agreement for countywide applicability and recommend to DAS Procurement for inclusion. Items recommended for review include:* • *Data protections* • *Acceptable Use of Information Technology directive* • *Remote Network Access directive* • *Access and ownership of data*	
Deadlines Established Y/N?	Yes
Date	**Management Comments:**
Current - Feb 2025	**IMSD Update:** In September 2024, DAS-IMSD shared with DAS-Procurement copies of our standard IT terms and conditions for inclusion in contracts that contain technology good and / or services. Going forward operationally, DAS-IMSD and DAS-Procurement continue to refine these standard terms and conditions as technology evolves.
July 2024	IMSD Update: IMSD remains on track to update standard IT terms and conditions by September 30, 2024.
Feb 2024	IMSD's completion of these standards requires alignment with a proposed AMOP around contracting processes. The DAS Director is reviewing changes and additions and is targeting a Q2 2024 revised draft of this AMOP.
Audit response – May 2023	IMSD will coordinate with Procurement, Office of the Comptroller, and Corporation Counsel, to develop standard IT terms and conditions for Master Service Agreements that cover data, retention, security, and service level agreements (SLAs). This will be completed by September 30, 2023.

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Recommendation #4
Recommendation – May 2023   *IMSD should present to the Director of the Department of Administrative Services any identified countywide items which should be included in the contract AMOP as work is continuing on the contract AMOP at the County.*

Deadlines Established Y/N?		Yes
Date	**Management Comments:**	

<mark>Current – Feb 2025</mark>	<mark>IMSD Update:</mark> DAS-IMSD worked with DAS-Procurement to include language in Appendix J of the updated Contracting AMOP, which was approved (October 17, 2024) and posted on CountyConnect (October 24, 2024). Appendix J states:
	
	 IMSD
	   a. IMSD's review of technology purchases (hardware, software, and subscription services) is required prior to execution of a contract. For purchases that require a bid or RFP, IMSD's review is required prior to issuance of the bid or RFP. Procurement will coordinate with IMSD to ensure proper review and approval via IMSD's Architectural Review Committee (ARC).
	   b. Draft, review and approve, and negotiate technology requirements for inclusion in contracts, bids, and RFPs.
	   c. Draft, review, approve, and negotiate special terms related to cybersecurity, IT security, data security, etc.
	   d. Draft, review, approve, and negotiate service level agreement (SLA) terms for delivery of technology goods and services.
	
	 Additionally, in September 2024, DAS-IMSD shared with DAS-Procurement copies of our standard IT terms and conditions for inclusion in contracts that contain technology good and / or services. Going forward operationally, DAS-IMSD and DAS-Procurement continue to refine these standard terms and conditions as technology evolves.	

July 2024	IMSD Update: IMSD continues to coordinate, as appropriate, with the Director of the Department of Administrative Services on updates to the contract AMOP. IMSD also continues to execute on the Digital Transformation Source-to-Pay projects, which will enhance these contracting processes.	

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Feb 2024	IMSD's completion of these standards requires alignment with a proposed AMOP around contracting processes. The DAS Director is reviewing changes and additions and is targeting a Q2 2024 revised draft of this AMOP.
Audit response – May 2023	IMSD has received a draft copy of the contract AMOP for our comment and review. Additionally, IMSD is coordinating with Procurement and the Office of the Comptroller in identifying technology solutions to support the updated Procure to Pay process as outlined in the draft AMOP. IMSD personnel will continue to support this initiative and will provide comments and feedback on the draft AMOP by June 30, 2023.

Recommendation #5	
Recommendation – May 2023	
IMSD should evaluate in consultation with the Office of the Corporation Counsel the need for a separate record retention clause in contracts data-related countywide beyond that of the Audit Clause and recommend changes to DAS Procurement as needed.	
Deadlines Established Y/N?	Yes
Date	**Management Comments:**
==Current – Feb 2025==	==IMSD Update:== In September 2024, DAS-IMSD shared with DAS-Procurement copies of our standard IT terms and conditions for inclusion in contracts that contain technology good and / or services. This includes audit and records related clauses. Going forward operationally, DAS-IMSD and DAS-Procurement continue to refine these standard terms and conditions as technology evolves.
July 2024	IMSD Update: IMSD remains on track to update standard IT terms and conditions by September 30, 2024.
Feb 2024	IMSD's completion of these standards requires alignment with a proposed AMOP around contracting processes. The DAS Director is reviewing changes and additions and is targeting a Q2 2024 release of this AMOP.
Audit response – May 2023	Please see the response to Item #3 above.

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Previously Closed Recommendations

Recommendation #1	

Recommendation - May 2023
 	
 IMSD present a documented plan to implement a data governance program at Milwaukee County including:
 	
     • *roles and responsibilities*
     • *the time frame and next steps*
     • *feasibility within the County's IT structure*
     • *projected fiscal impact*
     • *staffing and related costs*
 	
 This plan should be presented to the County Board within six months.	

Deadlines Established Y/N?	Yes
Date	**Management Comments:**
Feb 2024	Charter was completed in September 2023. The Charter is attached. SBP and IMSD will respond to any questions.
Audit response – May 2023	IMSD will work with the Strategy Director from the Strategy, Budget and Performance Department to update the existing data strategy and data governance components as a part of our three-year overall IT strategy refresh. It will also include roles, responsibilities, and needed financial and staff needs (both IMSD and departmental) to achieve the strategy. IMSD and the Strategy Director will also formally document a program charter. Our updates, distribution, and communication will be completed by September 20, 2023.

Recommendation #2	
Recommendation – May 2023 *In developing the data governance plan, IMSD should seek guidance from governmental entities who have successfully initiated or implemented data governance programs.*	

Deadlines Established Y/N?	N/A
Date	**Management Comments:**
Feb 2024	IMSD and SBP have engaged with Info-Tech to provide a Data Governance workshop the week of March 4, 2024. We have a wide range of Milwaukee County

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	departments who will be in attendance to complement the Charter we created in 2023.
Audit response – May 2023	Please see the discussion related to IMSD's consultation and ongoing engagement with Info-Tech (*provided in the audit report response*).

Recommendation #6	
Recommendation - May 2023	
IMSD create a plan to follow when making the selection of employee representatives for workgroups and committees it establishes to foster inclusion and representation that reflects the demographics, including but not exclusively racial, of Milwaukee County within six months.	
Deadlines Established Y/N?	No
Date	**Management Comments:**
Feb 2024	The Charter includes language requiring a diverse, cross-section of departments and personnel. We have a strong acceptance of the Data Governance workshop from the Milwaukee County departments that reflects the Charter's requirements. We consider this item closed.
Audit response – May 2023	For the data governance program strategy sessions with Info-Tech, IMSD included a diverse cross-section of departments and personnel to ensure a comprehensive strategy aligned with the County's mission and vision. In the formalized data governance program charter, IMSD will include requirements that the selection of employee representatives for workgroups and committees to ensure foster inclusion and representation.