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Office of Inspector General  
United States Department of State

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AUD-IT-21-34

Office of Audits

August 2021

# **Compliance Follow-Up Audit of the Department of State Process To Select and Approve IT Investments**

INFORMATION TECHNOLOGY DIVISION

UNCLASSIFIED



# HIGHLIGHTS

Office of Inspector General  
United States Department of State

AUD-IT-21-34

## What OIG Audited

In March 2016, the Office of Inspector General (OIG) reported<sup>a</sup> that the Department of State (Department) generally did not select IT investments following the defined process or in accordance with Office of Management and Budget (OMB) requirements. This occurred, in part, because the Bureau of Information Resource Management (IRM) did not have sufficient, centralized oversight; have controls to avoid duplicative IT investments; or fully use the IT portfolio management system.

OIG conducted this audit to determine whether (1) IRM took actions sufficient to warrant the closure of seven specific recommendations from the *Audit of the Department of State Process To Select and Approve Information Technology Investments* or (2) additional actions are needed to improve the IT investment selection and approval process.

## What OIG Recommends

With the issuance of this report, OIG is closing five of seven selected recommendations from its 2016 report, offering four new recommendations, and leaving two open, pending further action. On the basis of management's response to a draft of this report and related discussions, OIG considers all recommendations resolved, pending further action. A synopsis of management's response to the recommendations offered and OIG's reply follow each recommendation in the Audit Results section of this report. The Bureau of Administration's response to a draft of this report is reprinted in its entirety in Appendix B.

<sup>a</sup> OIG, *Audit of the Department of State Process To Select and Approve Information Technology Investments* (AUD-FM-16-31, March 2016).

August 2021

OFFICE OF AUDITS

INFORMATION TECHNOLOGY DIVISION

## Compliance Follow-Up Audit of the Department of State Process To Select and Approve IT Investments

### What OIG Found

IRM completed corrective actions to close one recommendation that related to developing and implementing policy and additional guidance for recording details of IT investments in the Department's IT portfolio management system. Specifically, OIG found that IRM adopted relevant OMB guidance and updated internal policies and procedures, as needed, to reflect the OMB guidance for IT investment tracking.

OIG also found that IRM took some actions to address four open recommendations, but further improvements are needed to fully address the 2016 audit findings. Specifically, IRM considered but has not developed and implemented policies and procedures related to reviewing IT portfolio reorganizations. In addition, although IRM had developed and implemented a process to compare requests for new IT investments to the existing IT portfolio to help identify duplicative systems, it has not performed a benchmark assessment, as previously recommended, of the entire IT portfolio to identify existing duplicative systems. Furthermore, although IRM designed and implemented a process to review and approve bureau-funded IT contracts, OIG found that not all IT procurements were appropriately routed to the Chief Information Officer for review and approval. Until additional actions are taken, IRM will not be able to fully identify duplicative systems and related cost-saving opportunities, optimize its IT investments, or promote shared services. OIG is therefore closing the previous four recommendations and issuing new recommendations to address the current situation.

Finally, OIG found that IRM had not taken sufficient corrective action related to two open recommendations. Specifically, IRM did not take action to develop and implement a process to identify and review bureau-specific IT investment methodologies. In addition, IRM has not developed and implemented policies and procedures to oversee and enforce requirements for bureaus and offices to avoid duplicative IT investments. These actions are needed to improve accountability and to further identify and avoid duplicative IT investments.

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## OBJECTIVE

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The Office of Inspector General (OIG) conducted this compliance follow-up audit to determine whether the Bureau of Information Resource Management (IRM) took actions sufficient to warrant the closure of seven specific recommendations from the *Audit of the Department of State Process To Select and Approve Information Technology Investments* (AUD-FM-16-31, March 2016), or whether additional actions are needed to improve the IT investment selection and approval process.

## BACKGROUND

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According to the Office of Management and Budget (OMB), the Federal Government spent approximately \$83 billion on IT-related activities in FY 2019.<sup>1</sup> Although the Government spends significant funds on IT activities, the Government Accountability Office reported that “[F]ederal IT investments too frequently fail or incur cost overruns and schedule slippages while contributing little to mission-related outcomes. These investments often suffered from a lack of disciplined and effective management, such as project planning, requirements definition, and program oversight and governance.”<sup>2</sup>

### Capital Planning and Investment Control Requirements

In 1996, Congress enacted the Information Technology Management Reform Act<sup>3</sup> (more commonly referred to as the Clinger-Cohen Act), which established the foundation for improvements in the way the Federal Government selects and invests in IT. The Clinger-Cohen Act established a comprehensive approach for executive agencies to improve the acquisition and management of their information resources by:

- focusing information resource planning to support strategic missions;
- implementing a capital planning and investment control (CPIC) process that links to budget formulation and execution; and
- rethinking and restructuring (i.e., reengineering) work processes before investing in information systems.<sup>4</sup>

To implement the requirements of the Clinger-Cohen Act, OMB developed policies that agencies must adhere to during the CPIC process. For example, OMB Circular A-130<sup>5</sup> states that “Agencies are responsible for establishing a decision-making process that shall cover the life of each information system and include explicit criteria for analyzing the projected and actual

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<sup>1</sup> As reported on the OMB IT Dashboard, <https://myit-2019.itdashboard.gov/drupal/summary/000>.

<sup>2</sup> Government Accountability Office, *Substantial Efforts Needed to Achieve Greater Progress on High-Risk Areas* (GAO-19-157SP, March 2019), at 123.

<sup>3</sup> Pub. L. No. 104-106, Division E.

<sup>4</sup> *Ibid.*, at § 11313.

<sup>5</sup> OMB Circular A-130, “Managing Information as a Strategic Resource,” July 28, 2016.

costs, benefits, and risks, including information security and privacy risks, associated with the IT investments.”<sup>6</sup> The CPIC process is intended to help ensure that IT investments support the agency’s core mission, reduce cost, reduce duplication, and improve effectiveness.<sup>7</sup> In addition, OMB Circular A-11<sup>8</sup> includes the “Capital Programming Guide,” which provides guidance for “a disciplined capital programming process, as well as techniques for planning and budgeting, acquisition, and management and disposition of capital assets.”<sup>9</sup>

In FY 2014, Congress passed the Federal Information Technology Acquisition Reform Act (FITARA) to further enforce the IT investment requirements established in the Clinger-Cohen Act.<sup>10</sup> FITARA requires agencies to tailor their CPIC processes to enable a higher level of scrutiny over IT capital investment spending.<sup>11</sup> FITARA reaffirmed that the Chief Information Officer (CIO) is responsible for annually reviewing and approving agency IT investment portfolios.<sup>12</sup> Additionally, FITARA explains that the CIO should functionally be a part of the technical and business implementation reviews of IT investments across all bureaus.<sup>13</sup>

## **IT Investment Management Structure**

According to the OMB IT Dashboard, the Department of State (Department) spent \$2.5 billion on IT assets in FY 2019.<sup>14</sup> The Department’s CIO, who is IRM’s Assistant Secretary, is responsible for managing the Department’s IT investments and controlling the IT inventory across all bureaus and posts. The CIO is primarily responsible for IT governance, which encompasses IT planning, budget formulation and execution, acquisition, architecture, cybersecurity, workforce strategy, and operations. IRM establishes the Department’s IT strategic plan and manages IT policy.<sup>15</sup>

To assist the CIO in carrying out responsibilities related to IT portfolio oversight, the Department established two groups—the IT Executive Council and the IT Executive Council Program Management Office (ITEC PMO). The IT Executive Council, a Department-wide governance board chaired by the CIO was designed to be the Department’s strategic IT decision-making body. The IT Executive Council is directed by the Enterprise Governance Board, which is chaired by the Deputy Secretary of State and the Under Secretary for Management.

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<sup>6</sup> Ibid., at 12.

<sup>7</sup> Pub. L. No. 113-291, Title VIII, Subtitle D, “National Defense Authorization Act for Fiscal Year 2015,” December 2014, § 833.

<sup>8</sup> OMB Circular A-11, “Preparation, Submission, and Execution of the Budget,” July 2020.

<sup>9</sup> Ibid., “Capital Programming Guide,” at 1.

<sup>10</sup> Pub. L. No. 113-291. FITARA increased the authority of agency CIOs over IT and strengthened IT acquisition practices in the Federal Government. The Act also included provisions for eliminating duplicative IT systems, including duplicative contracts, across the Federal Government.

<sup>11</sup> Ibid., § 832.

<sup>12</sup> Ibid., at §11319.

<sup>13</sup> Ibid., at § 831 and 833.

<sup>14</sup> As reported on the OMB IT Dashboard, <https://itdashboard.gov/drupal/summary/014>.

<sup>15</sup> Pub. L. No. 113-291, at §11319.

The IT Executive Council supports five primary areas of Department-wide IT portfolio oversight and IT strategic management:<sup>16</sup>

- IT concepts for funding, architecture, user requirements, or security recommendations.
- Process and service improvements.
- Policy updates.
- Innovation in use of technology for mission enablement.
- Recommendations to re-scope or terminate IT projects.

The ITEC PMO was designed to provide cross-agency support and assist in IT project proposal identification, review, and recommendation.<sup>17</sup> The Department’s CPIC Guide states that the “[ITEC] PMO gathers and assesses all project justification packages throughout the Department.”<sup>18</sup> The ITEC PMO is charged with ensuring consistency and enforcement of the Department’s IT investment policies throughout the Department and is responsible for maintaining the CPIC Guide.<sup>19</sup>

According to the CPIC Guide, IRM uses the CPIC process for “identifying, prioritizing, planning, launching, evaluating, and improving information technology used at the Department.”<sup>20</sup> The CPIC Guide includes the Department’s process for hearing “ideas for new IT investments, and making sure those ideas can be recognized, resourced, and implemented in a way that provides the most value to the Department as a whole.”<sup>21</sup> Figure 1 illustrates the Department’s CPIC process, which has four primary phases: pre-select, select, control, and evaluate.

**Figure 1: CPIC Phases**



**Source:** Capital Planning and Investment Control Guide, April 24, 2017.

<sup>16</sup> IRM, IT Executive Council (ITEC) Charter, 2019, at 1.

<sup>17</sup> IRM, Capital Planning and Investment Control Guide, April 24, 2017, at 4. Note: When originally formed, the ITEC PMO was called the E-Government PMO.

<sup>18</sup> Ibid., at 11.

<sup>19</sup> Ibid., at 4 and 39.

<sup>20</sup> Ibid., at 1.

<sup>21</sup> Ibid., at iii.

The most critical step in any CPIC process is the selection phase. During this phase, the organization determines priorities and makes decisions about which projects will be funded. The selection phase helps ensure that the organization selects IT projects that will best support mission needs and identifies and analyzes project risks and benefits before a significant amount of project funding is spent.<sup>22</sup> Management participation in the CPIC selection phase is vital to ensure decision-making emphasizes using IT to enhance mission performance. During the selection phase, OMB requires that an agency document its business need for an investment, its consideration of alternative investments, and its analysis of the estimated costs and benefits associated with the investment.<sup>23</sup>

The selected systems and projects make up the IT investment portfolio. After the selection phase, management should consistently control and manage all IT projects in the portfolio.

## **2016 OIG Report**

In its March 2016 report,<sup>24</sup> OIG reported, among other issues, that the Department generally did not select IT investments in accordance with either the process it had designed or OMB requirements. OIG also reported that this occurred, in part, because the Department did not have sufficient, centralized oversight, controls to prevent duplicative IT investments, or a sufficiently implemented IT portfolio management system.<sup>25</sup> Furthermore, the Department did not implement adequate controls to assess and avoid duplicative IT investments. The Department also did not use its IT portfolio management system, the Integrated Management Analytics, and Technology Resource for Information Exchange system (iMatrix),<sup>26</sup> consistently or to its full capabilities. Specifically, not all bureaus used iMatrix, and IRM did not provide full access to iMatrix information to all users, which limited bureaus' ability to identify duplicative IT investments. Because of these issues, stakeholders lacked visibility into the Department IT portfolio, the Department made duplicative IT investments, and the Department was not well positioned to implement new mandates related to IT investments. In the 2016 report, OIG made 30 recommendations intended to improve the Department's IT investment selection, approval, and reporting process. This compliance follow-up audit assessed the status of Recommendations 8, 10-14, and 17, which were open and considered resolved, pending further action.

OMB Circular A-50 requires each agency to establish systems to promptly and properly resolve and implement audit recommendations.<sup>27</sup> OIG considers a recommendation unresolved, resolved, or closed on the basis of actions that the Department has taken or plans to take in response to the recommendation. A recommendation is considered unresolved if the

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<sup>22</sup> Ibid., at 7-10.

<sup>23</sup> OMB Circular A-130, at 12-13.

<sup>24</sup> OIG, *Audit of the Department of State Process To Select and Approve Information Technology Investments* (AUD-FM-16-31, March 2016).

<sup>25</sup> Ibid., at 40.

<sup>26</sup> iMatrix is the Department's IT portfolio management tool that is also used to report IT spending.

<sup>27</sup> OMB Circular A-50, "Audit Followup," § 5, "Policy."

Department has neither acted nor stated how it plans to implement the recommendation. A recommendation is considered resolved when the Department has agreed to implement the recommendation or has begun, but has not yet completed, actions to fully implement the recommendation. Open recommendations include both unresolved and resolved recommendations. A recommendation is considered closed when the Department has completed actions necessary to implement the recommendation and OIG has determined that no additional action is required.

## COMPLIANCE FOLLOW-UP AUDIT RESULTS

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### **Finding A: IRM Took Corrective Actions To Implement and Close One Recommendation**

OIG found that IRM completed corrective actions to implement and close one recommendation (Recommendation 17) from OIG's 2016 report. The recommendation involved developing and implementing policy and additional guidance for recording details of IT investments in iMatrix, the Department's IT investment tracking system. Specifically, OIG found that IRM adopted relevant OMB guidance and updated internal policies and procedures, as needed, to reflect OMB guidance for tracking IT investments.

#### ***Use of iMatrix***

In its 2016 report,<sup>28</sup> OIG stated that bureaus were not providing sufficient general information and technical descriptions for IT investments and projects recorded in iMatrix.<sup>29</sup> OIG stated that to make effective and informed decisions, management needs readily available and accurate data for all components of the IT portfolio. OIG reported that 43 (52 percent) of 83 investments reviewed in iMatrix did not have adequate general descriptions for users to understand the nature, scope, and purpose of the existing investment. For example, the descriptions for some investments recorded in iMatrix were too vague to provide useful information to a user on the services or capabilities provided by the investment to avoid duplication. In addition, for some investments, iMatrix contained more detailed information, but that information was not presented as part of the investment's general information. A user would have to read more detailed information about the investment within several other iMatrix sections, such as the information contained within the performance goals or risk plans.

On the basis of its finding, OIG made the following recommendation in its March 2016 report:

#### **AUD-FM-16-31, Recommendation 17**

*OIG recommends that the Bureau of Information Resource Management (a) develop and implement a policy requiring bureaus and offices to provide details of IT investments,*

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<sup>28</sup> AUD-FM-16-31, March 2016, at 35-39.

<sup>29</sup> iMatrix is the Department IT portfolio management tool and the official system of record for all IT investments, programs, projects, and assets.

*programs, and projects in iMatrix and (b) develop and disseminate guidance specifying the level of detail necessary for each investment, including general descriptions and technical capabilities.*

During this compliance follow-up audit, OIG found that IRM completed corrective actions to implement and close Recommendation 17 from OIG's 2016 report. Specifically, OIG found that in 2017 IRM updated the Department's IT CPIC Guide,<sup>30</sup> requiring bureaus, offices, and posts to use the single system of record, iMatrix, for technology requests. To facilitate process improvements, IRM updated iMatrix to correspond with the requirements in OMB's "Capital Planning Guidance,"<sup>31</sup> including updating the naming conventions and field descriptions in iMatrix to increase the general understanding of the level of detail necessary for each field. Additionally, in support of the annual investment submission process, the ITEC PMO provided bureaus with resources (e.g., information sessions and training materials) to improve the quality of investment details that were entered into iMatrix.

To determine whether bureaus were entering sufficient details related to IT investments in iMatrix, OIG assessed 16 iMatrix fields for 20 investments<sup>32</sup> and found that bureaus generally included sufficient information.<sup>33</sup> Therefore, OIG concludes that the actions taken by IRM to address Recommendation 17 in its March 2016 report meets the intent of the recommendation. OIG determined that a reasonable person could use the annual guidance provided by OMB,<sup>34</sup> in conjunction with the Department's supplemental guidance and the iMatrix field descriptions, to consistently and appropriately capture details of IT investments, programs, and projects within iMatrix. OIG is, therefore, closing Recommendation 17 from its March 2016 report, and no further action specific to this recommendation is required.

## **Finding B: IRM Took Corrective Actions Related to Four Recommendations, but Further Improvements Are Needed**

OIG found that IRM took some actions to address four open recommendations from OIG's 2016 report (Recommendations 8, 12, 13, and 14), but further improvements are needed. Specifically, IRM considered but has not developed and implemented policies and procedures related to reviewing IT portfolio reorganizations. In addition, although IRM developed and implemented a process to compare requests for new IT investments to the existing portfolio of IT investments to identify duplicative systems, it has not performed a benchmark assessment, as previously recommended, of the entire IT portfolio to identify existing duplicative systems. Furthermore, although IRM designed and implemented a process to review and approve bureau-funded IT contracts, OIG found that not all IT contracts were appropriately routed for CIO review and approval. Until additional actions are taken, IRM will not be able to fully identify

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<sup>30</sup> IRM, "Capital Planning and Investment Control Guide," April 2017.

<sup>31</sup> OIG found that 95 of the iMatrix fields correlated with the OMB FY 2021 Capital Planning Guidance fields.

<sup>32</sup> Appendix A: Purpose, Scope, and Methodology provides details of the sample selected.

<sup>33</sup> OIG identified one field type, which was not required, that was not consistently completed.

<sup>34</sup> OMB, "FY 2021 IT Budget – Capital Planning Guidance," July 2019, at 35-53.

duplicative systems and related cost-savings opportunities, optimize its IT investments, or promote shared services.

### ***Portfolio Reorganization Policy***

In its 2016 report,<sup>35</sup> OIG stated that the Department lacked centralized oversight of reorganizations. Specifically, the Department did not have a requirement for bureaus to consult with the ITEC PMO prior to initiating a reorganization of IT investments or to notify the ITEC PMO when reorganizations were completed. In addition, the CPIC Program Guide did not prescribe how or when a reorganization of a bureau's investments was necessary and allowable and did not include an approval protocol for IT portfolio reorganization. Furthermore, the ITEC PMO did not review reorganizations to ensure that the new investments that were created complied with requirements. Moreover, Department bureaus did not report information on potential reorganizations to the ITEC PMO and the ITEC PMO did not actively inquire about bureau reorganizations.

Based on the finding, OIG made the following recommendation in its March 2016 report:

#### **AUD-FM-16-31, Recommendation 8**

*OIG recommends that the Bureau of Information Resource Management establish and implement a plan to review IT investment reorganizations that occurred since FY 2010 to ensure that the investments resulting from the reorganizations comply with Office of Management and Budget requirements for information technology investments.*

During this compliance follow-up audit, OIG found that IRM considered but has not fully implemented the recommendation. Specifically, IRM officials stated that they do not believe that performing retroactive reviews of reorganizations that occurred since 2010<sup>36</sup> is cost efficient, beneficial, or the best use of limited resources. OIG acknowledges that because IRM did not implement Recommendation 8 from the prior report, which included the 2010 date, that timeframe is no longer practical due to the time that has elapsed. Nonetheless, OIG maintains that IRM should focus on improving its oversight of reorganizations moving forward.

Although OIG found that IRM performs some activities to identify and record IT investment reorganizations within iMatrix<sup>37</sup> and informs OMB of the reorganizations that are identified, it has not developed and implemented a formal process to review IT investment reorganizations to ensure that the resulting investments comply with OMB IT requirements. According to IRM officials interviewed during fieldwork for this compliance follow-up audit, IRM is awaiting OMB guidance prior to implementing its planned technology business management framework.<sup>38</sup> It is

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<sup>35</sup> AUD-FM-16-31, March 2016, at 26.

<sup>36</sup> In the 2016 report, OIG noted that IRM reorganized its IT investment portfolio in 2010.

<sup>37</sup> IRM officials stated that bureaus should use the "Status Change" and "Status Change Description" fields to identify reorganizations.

<sup>38</sup> A technology business management framework helps organizations to integrate IT into the organization, with the goal of running an IT department like a business.

important to note, however, that IRM's response to Recommendation 8 from OIG's March 2016 audit report also stated that it was awaiting OMB guidance. An IRM official initially stated that OMB guidance was anticipated to be provided by June 2020; however, the official later stated that the timeline for OMB providing the guidance had not been finalized.

The lack of documented procedures for reviewing reorganizations of IT investments will result in inconsistent reorganization-related activities. Specifically, without adequate guidance, different offices may perform tasks inconsistently and procedures could be missed or improperly performed. This risk is increased when staff changes occur, and continuing operations without documented procedures will decrease transparency and oversight of IT acquisitions. In addition, improperly grouped IT efforts and assets will make it more difficult for management to control costs, maintain investments, measure results, and determine whether investments are appropriately meeting objectives. All of these aspects contribute to how well the Department meets its mission and funds its IT investments.

The actions taken by IRM to address Recommendation 8 did not fully correct the deficiencies identified in the 2016 OIG audit report. However, OIG is closing Recommendation 8 from the prior report and is issuing a new recommendation to address the deficiencies identified during this compliance follow-up audit.

**Recommendation 1:** OIG recommends that the Bureau of Information Resource Management develop and implement policies and procedures related to reviewing IT investment reorganizations conducted by all bureaus and offices to ensure that the resulting investments comply with Office of Management and Budget, Circular A-130, requirements.

**Management Response:** IRM did not provide a formal response to the draft report. However, during a meeting on July 15, 2021, IRM officials verbally concurred with the recommendation.

**OIG Reply:** On the basis of IRM's concurrence with the recommendation when discussing the audit findings on July 15, 2021, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that IRM has developed and implemented policies and procedures related to reviewing IT investment reorganizations conducted by all bureaus and offices to ensure that the resulting investments comply with OMB Circular A-130 requirements.

### ***IT Portfolio Review***

In its 2016 report,<sup>39</sup> OIG reported that the Department had not developed and implemented adequate policies and procedures to avoid duplicative IT investments. OIG also reported that there was a lack of focus on centrally reviewing investments for duplication. The report explained that instead of reviewing the entire agency portfolio regularly, the Department

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<sup>39</sup> AUD-FM-16-31, March 2016, at 31-32.

reviewed major investments only. In addition, a Department official stated that the Department had difficulty finding time to adequately review the 17 major investments that existed at that time, which made up only 20 percent of the Department's IT portfolio. As a result, the Department was simply unable to review other IT investments. Although a Department official stated there was a time when portfolio reviews were performed to establish accountability over all IT investments across the Department, time and resource constraints made that practice implausible.

Based on the finding, OIG made the following recommendations in its March 2016 report:

**AUD-FM-16-31, Recommendation 12**

*OIG recommends that the Bureau of Information Resource Management develop and implement a process to perform periodic, but no less than annual, reviews of the entire agency IT portfolio to enforce bureau accountability and identify potential duplicative systems.*

**AUD-FM-16-31, Recommendation 13**

*For duplicative systems that are identified by the new process implemented to perform periodic reviews of the entire agency IT portfolio (Recommendation 12), OIG recommends that the Bureau of Information Resource Management develop and implement a strategy to combine, eliminate, or replace duplicative systems, as practicable.*

During this compliance follow-up audit, OIG found that IRM made incremental progress to address the intent of the recommendations. Although IRM had not developed and implemented a process to perform periodic reviews of the entire IT portfolio, IRM implemented a review process for all new IT investment requests submitted during the annual budget process. Specifically, Department officials are supposed to notify IRM of IT needs by submitting IT Concept Questionnaires. The ITEC PMO compares the concepts that are submitted to the existing portfolio of IT investments documented in iMatrix to identify proposals that are potentially duplicative of other submissions or of existing systems.

According to IRM officials, the purpose of the comparison is to identify opportunities for shared solutions and to plan an IT portfolio that optimizes agency resources. More specifically, the CPIC guide includes IRM's objective to identify IT investment requests as duplicative prior to acquisition and prevent bureaus from investing in new, duplicative systems. OIG reviewed 15 of 86<sup>40</sup> IT concept assessment forms from FY 2019 and found that IRM identified concepts that were potentially duplicative of other proposed concepts or of existing systems in the IT portfolio. However, IRM has not conducted a thorough review of the entire existing portfolio of IT investments. Therefore, IRM cannot be assured that no duplicative systems already exist.

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<sup>40</sup> Appendix A: Purpose, Scope, and Methodology provides details of the sample selected.

According to an ITEC PMO official, a review of the entire portfolio has not been performed because the ITEC PMO's primary focus is a strategic, forward-looking strategy that makes the best use of limited resources. The official stated that detailed reviews of the entire portfolio are not an effective use of resources and would not add value to the Department. Furthermore, although IRM had not performed an analysis, the official stated that he did not believe there were duplicative systems currently in the portfolio.

OIG maintains that IRM's strategy could be improved if IRM committed resources to conduct a detailed review of the existing portfolio to serve as a baseline. Such a review could identify duplicative systems that may already be in the portfolio, as well as provide a sufficient level of detail to optimize the use of Department resources going forward. Furthermore, by not taking steps to confirm the assertion that no duplication exists in the portfolio, the Department's strategy of evaluating duplication upon the submission of a budget proposal may never identify opportunities for efficiencies and cost savings readily attributable to IT consolidation efforts.

The actions taken by IRM to address Recommendations 12 and 13 did not fully correct the deficiencies identified in the 2016 OIG audit report regarding the need for periodic portfolio reviews. However, the incremental progress demonstrated by IRM, in conjunction with its forward-looking strategy, warrants closing Recommendations 12 and 13 from the prior report with the issuance of this report. OIG is therefore closing those recommendation and issuing new recommendations to specifically address the deficiencies identified during this compliance follow-up audit.

**Recommendation 2:** OIG recommends that the Bureau of Information Resource Management conduct an in-depth review of the entire agency IT portfolio to identify potential duplicative systems.

**Management Response:** IRM did not provide a formal response to the draft report. However, during a meeting on July 15, 2021, IRM officials verbally concurred with the recommendation.

**OIG Reply:** On the basis of IRM's concurrence with the recommendation when discussing the audit findings on July 15, 2021, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that IRM has conducted an in-depth review of the entire agency IT portfolio to identify potential duplicative systems.

**Recommendation 3:** OIG recommends that the Bureau of Information Resource Management develop and implement, to the extent practicable, a strategy to combine, eliminate, or replace the duplicative systems identified during its review of the entire agency IT portfolio (Recommendation 2).

**Management Response:** IRM did not provide a formal response to the draft report. However, during a meeting on July 15, 2021, IRM officials verbally concurred with the recommendation.

**OIG Reply:** On the basis of IRM’s concurrence with the recommendation when discussing the audit findings on July 15, 2021, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that IRM has developed and implemented, to the extent practicable, a strategy to combine, eliminate, or replace the duplicative systems identified during its review of the entire agency IT portfolio (Recommendation 2).

***Bureau-Funded IT Contracts Review***

In its 2016 report,<sup>41</sup> OIG reported that IRM lacked centralized oversight of new investments and the Department had not developed and implemented adequate policies and procedures to avoid duplicative IT investments. OIG reported that there was a general lack of oversight and enforcement from IRM to require bureaus to collaborate on IT investments and avoid duplication. One impediment to assessing duplication related to long-standing bureau-funded contracts for providing IT support services that were in place. Bureaus used the contracts to obtain IT services in an expedited manner. Because separate contracts were not needed to implement IT additions or improvements, bureaus did not need to evaluate alternatives, which might have led to reduced costs or avoided duplication.

On the basis of the finding, OIG made the following recommendation in its March 2016 report:

**AUD-FM-16-31, Recommendation 14**

*OIG recommends that the Bureau of Information Resource Management develop and implement a strategy to perform semiannual or more frequent reviews of bureau-funded IT contracts to identify new IT investments developed as part of the contracts.*

During this compliance follow-up audit, OIG found that IRM developed and implemented a strategy to review IT contracts prior to implementation. Specifically, IRM issued a Department-wide notice stating that “[CIO] approval is required for IT acquisitions exceeding \$10,000 . . . Requests containing IT and valued over \$1,000,000 will require additional review by the Under Secretary for Management.” IT investment requests approved by a bureau sponsor are supposed to be submitted to IRM for approval, using the Department’s procurement application, Ariba. Once approved by the CIO, requests are forwarded to a contracting officer, within the Bureau of Administration, Office of the Procurement Executive, Office of Acquisitions Management, for review. The contracting officer is supposed to ensure that IT investments are approved by the CIO prior to acquisition.<sup>42</sup> To ensure that the Department implemented its process, OIG selected 24 IT procurements exceeding \$10,000

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<sup>41</sup> AUD-FM-16-31, March 2016, at 31-34.

<sup>42</sup> IRM, “Policy and Process for IT Acquisitions Exceeding \$10,000 FY 2020 Guidance,” Announcement #: 55160, September 2019, at 1.

from January to March 2020 and confirmed that IRM officials reviewed documentation and the CIO approved all of the 24 procurements routed for IRM's review.<sup>43</sup>

OIG also assessed 51 requisitions that exceeded \$10,000 that were not flagged as IT and found that 15 (29 percent) were IT-related, based on the description provided in Ariba. The 51 acquisitions included IT equipment (such as routers, switches, and modems) and network services. Specifically, OIG identified a contract modification to exercise an option year for 41 third-party IT related contractors, totaling \$3,500,000; a request to add funds to a contract for IT infrastructure support, advanced audio/visual and video services, network communications, IT management services, and cybersecurity, totaling \$175,000; a firewall and switch, totaling \$49,066; Microsoft-related licenses, totaling \$47,292; and multiple requisitions for satellite modems, totaling more than \$120,000. Because these requisitions were not flagged as IT-related, the acquisitions were not reviewed and approved by the CIO. IRM and Bureau of Administration officials stated that program offices are responsible for identifying IT requisitions within Ariba. Bureau of Administration officials acknowledged that procurements could bypass CIO approval if the program office did not flag a procurement as an IT requisition. As a result, OIG determined that the process was not sufficient for identifying IT procurements in excess of \$10,000 and the CIO may not be afforded the opportunity to review and approve all IT procurements, as required.

Maintaining an effective review process for bureau-funded IT contracts is critical for IRM to ensure Department compliance with OMB Circular A-130 requirements and to "allow the CIO to assess each request's alignment to the IT investment portfolio and the Department mission."<sup>44</sup> Adequate oversight is not possible if IT procurements are processed without the review and approval of the CIO, as required by FITARA.<sup>45</sup>

The actions taken by IRM to address Recommendation 14 did not fully correct the deficiencies identified in the 2016 OIG audit report regarding the need for IT procurement reviews. However, the progress demonstrated by IRM warrants closing Recommendation 14 from the prior report with the issuance of this report. OIG is therefore closing that recommendation and issuing a new recommendation to specifically address the deficiencies identified during this compliance follow-up audit.

**Recommendation 4:** OIG recommends that the Bureau of Administration develop and implement a methodology for identifying requisitions of or exceeding \$10,000 that have not been properly identified as IT-related acquisitions.

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<sup>43</sup> In one instance, the Ariba comments field indicated the procurement had been reviewed but did not specifically indicate approval. Subsequently, another official approved the procurement but did not update the comments field.

<sup>44</sup> Cable 19 State 102126.

<sup>45</sup> Pub. L. No. 113-291, Title VIII, Subtitle D, "National Defense Authorization Act for Fiscal Year 2015," December 2014, § 831.

**Management Response:** The Bureau of Administration concurred with the recommendation, stating that it will work with IRM to develop and implement the best approach and policy doctrine for identifying requisitions that are not properly identified as IT-related acquisitions (see Appendix B for the bureau's formal response to a draft of this report).

**OIG Reply:** On the basis of the Bureau of Administration's concurrence with the recommendation and planned actions, OIG considers this recommendation resolved, pending further action. The recommendation will be closed when OIG receives documentation demonstrating that the Bureau of Administration has developed and implemented a methodology for identifying requisitions of or exceeding \$10,000 that have not been properly identified as IT-related acquisitions.

### **Finding C: IRM Did Not Take Sufficient Corrective Actions Involving Two Selected Recommendations**

OIG found that IRM had not taken sufficient corrective actions involving two open recommendations selected for this compliance follow-up audit (Recommendations 10 and 11). Specifically, OIG found that IRM had not taken action to develop and implement a process to identify and review bureau-specific IT investment methodologies. In addition, IRM had not developed and implemented policies and procedures to oversee and enforce requirements for bureaus and offices to avoid duplicative IT investments. Therefore, additional actions are needed to improve accountability and to identify duplicative IT systems.

#### ***Policy To Identify and Review Bureau-Specific IT Investment Methodologies***

In its 2016 report,<sup>46</sup> OIG reported that although the E-Gov PMO Board, now referred to as the IT Executive Council, existed to centralize oversight and create collaboration, long-standing bureau practices and portfolio management preferences remained in place, leading to inconsistencies in how bureaus selected and approved IT investments. OIG also reported that documentation obtained throughout the audit was inconsistent, even within the same bureau, and largely different across bureaus. In addition, OIG reported that bureaus' policies did not prescribe that all OMB requirements must be considered prior to approving IT investments. That is, bureau-specific policies allowed bureau officials to approve the initiation of a project before sufficiently analyzing costs and benefits, which were required components of a selection phase.

Furthermore, OIG reported that the CPIC Program Guide in place at the time of the audit did not include a requirement for the ITEC PMO to review and approve bureau-specific IT investment processes. This lack of guidance increased the ambiguity of IRM's authority over IT investments funded by the bureaus, including the relationship between the ITEC PMO and bureau leadership. Because of the unclear relationship, bureaus did not always coordinate their processes with the ITEC PMO, and the ITEC PMO did not have an opportunity to review the

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<sup>46</sup> AUD-FM-16-31, March 2016, at 26-27.

bureau's IT investment policies for compliance with OMB requirements. Without input from the ITEC PMO, bureaus and offices interpreted the Department's CPIC Program Guide differently and adjusted their processes to reflect their interpretation and needs.

Based on the finding, OIG made the following recommendation in its March 2016 report:

**AUD-FM-16-31, Recommendation 10**

*OIG recommends that the Bureau of Information Resource Management develop and implement a process to (a) identify and review all bureau-specific IT investment methodologies (ones currently in place as well as ones that will be developed in the future); (b) determine whether the bureau-specific IT investment methodologies comply with Office of Management and Budget Circular A-130; and, if they do not comply, (c) provide bureaus with guidance regarding the modifications needed to fully comply and verify that the methodologies were modified as necessary. This effort should include reviewing the standard forms used by each bureau during the IT selection process to ensure consistency and compliance with Office of Management and Budget Circular A-130.*

During this compliance follow-up audit, OIG found that IRM made progress in implementing corrective actions related to this recommendation since the prior audit. For example, the Department updated the Foreign Affairs Manual<sup>47</sup> and issued the "FY 2022 Bureau Resource Request Guidance."<sup>48</sup> In a 2019 compliance response, IRM stated that it "will develop stronger policies for investment management methodologies following [the completion of] efforts to clarify intersects between the budget process and IT capital planning."

Although IRM made progress to improve policies, IRM officials stated that IRM has not developed a policy requiring IRM to review and provide feedback on bureau-specific IT investment methodologies. IRM officials acknowledged that bureaus could adopt individualized IT project management methodologies<sup>49</sup> and confirmed that an investment could circumvent the CPIC process and be included in the Department's budget request.

According to IRM officials, one reason that it has not implemented Recommendation 10 from the prior OIG report is that IRM was focusing primarily on updating the overall CPIC guidance, which addresses a Department-wide (i.e., non-bureau specific) CPIC methodology. In addition,

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<sup>47</sup> Foreign Affairs Manual, 5 FAM 131.e, "General Policies," requires that "All Department IT managers must adhere to reporting requirements for IT performance measures initiated through the Department's electronic [CPIC] system." In addition, 5 FAM 611.g, "General," requires that "All major projects must be evaluated through the [CPIC] process."

<sup>48</sup> The "FY 2022 Bureau Resource Request Guidance" provides bureaus guidance to support the budget process. Specifically, it provides specific instructions for bureaus to draft narratives to summarize, justify, and explain requests and reiterates the requirement to use iMatrix to track all IT investments for the CPIC process.

<sup>49</sup> OIG contacted the bureaus that were included in the 2016 audit (IRM and the Bureaus of Diplomatic Security and Administration) to determine whether they had bureau-specific IT investment methodologies. Officials from each of these bureaus stated that they did not currently have bureau-specific IT investment methodologies.

IRM officials stated that IRM was working with partner bureaus to implement management controls to better enforce the implementation of the CPIC Guide across the Department. For example, IRM implemented a requirement for bureaus to submit IT resource requests that aligned to corresponding investment information within their IT portfolios. Additionally, IRM requires bureaus entering IT procurement requests to align their requests to specific investments.

The current CPIC guidance is intended for Department-wide usage. However, it does not indicate that bureau-specific methodologies are prohibited. Furthermore, IRM does not have an established policy to determine whether bureau-specific IT investment methodologies exist and, if they do, to review them for sufficiency.

The effectiveness of the Department's internal control environment can be limited when insufficient or contradictory policies and processes are in place. Policies and procedures serve as a control mechanism that describe what employees should do and how the steps should be done. Without documented policies and procedures in place, IRM's internal control mechanism could be jeopardized because there will be no established roadmap that employees can use to perform consistent and effective bureau-specific IT investment methodology reviews.

The actions taken by IRM to address Recommendation 10 from OIG's March 2016 audit report have not been sufficient to close that recommendation. Therefore, Recommendation 10 remains open, pending further action.

### ***Policies To Avoid Duplicative Investments***

In its 2016 report,<sup>50</sup> OIG reported that the Department had not developed and implemented adequate policies and procedures to avoid duplicative IT investments. Specifically, OIG reported a general lack of oversight and enforcement from IRM to require bureaus to collaborate on IT investments and avoid duplication. For example, the bureaus included in the audit were often focused on their own program- and mission-specific needs rather than focused on the overall needs of the agency. Bureaus generally reported that their IT needs were "unique" (i.e., mission specific), and officials stated that investments made using bureau funds inherently could not duplicate investments made by other bureaus or offices because the investments were mission specific. Some bureau officials stated that they found it easier to document their specific needs for developing a new system rather than work with other bureaus.

Based on the finding, OIG made the following recommendation in its March 2016 report:

#### **AUD-FM-16-31, Recommendation 11**

*OIG recommends that the Bureau of Information Resource Management develop and implement policies and procedures to oversee and enforce requirements for bureaus and offices to avoid duplicative IT investments.*

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<sup>50</sup> AUD-FM-16-31, March 2016, at 31-32.

During this compliance follow-up audit, OIG found that IRM had not developed and implemented policies and procedures to oversee and enforce requirements for bureaus and offices to avoid duplicative IT investments, as recommended. According to IRM officials, IRM implemented processes that seek to emphasize reuse and avoid duplication. For example, IRM developed the IT Concept Questionnaires for bureaus to enable IT acquisition,<sup>51</sup> IT adjudication, and IT assessment reviews.<sup>52</sup> Furthermore, the Department's CPIC Guide addresses the need for bureaus to check for potential duplicative IT investment submissions. However, the Guide does not contain procedures for IRM to perform checks to identify duplicative IT investment submissions.

According to IRM officials, IRM has not acted on Recommendation 11 from OIG's 2016 report because IRM is waiting for OMB to establish a Federal IT shared-service approach.<sup>53</sup> IRM officials anticipated that the OMB IT shared-service framework would be available in June 2020; however, as of March 2021, OMB had not issued the guidance.

Internal control effectiveness can be limited without documented policies and procedures to oversee and enforce requirements for bureaus and offices to avoid duplicative IT investments. Policies and procedures serve as a control mechanism to effectively describe what to do and how to do it. Without adequate policies and procedures, IRM's internal control environment is lacking.

The actions taken by IRM to address Recommendation 11 from OIG's March 2016 audit report have not been sufficient to close that recommendation. Therefore, Recommendation 11 remains open, pending further action.

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<sup>51</sup> IRM's acquisition reviews are based on entries in the procurement system. Any acquisition exceeding \$10,000 that is identified as an IT investment requires IRM's review and approval.

<sup>52</sup> IRM's adjudication and IT assessment reviews are intended to determine if requests can be handled using existing systems, applications, or entities. In addition, the reviews are supposed to assess whether to continue with the CPIC process if requests do not meet the assessment criteria.

<sup>53</sup> OMB Memorandum M-19-16, "Centralized Mission Support Capabilities for the Federal Government," April 26, 2019, states that the guidance is intended to "reduce duplication, improve accountability, and improve Federal shared services." OMB also stated that the Government will have to "define and execute an integrated approach to shared services" including developing inter-agency standards and priorities for shared services; creating centralized capabilities, shared governance, and performance expectations; and continuing to expedite the adoption of existing quality services that currently perform well and provide demonstrated value to agency customers, at 2.

## RECOMMENDATIONS

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**Recommendation 1:** OIG recommends that the Bureau of Information Resource Management develop and implement policies and procedures related to reviewing IT investment reorganizations conducted by all bureaus and offices to ensure that the resulting investments comply with Office of Management and Budget, Circular A-130, requirements.

**Recommendation 2:** OIG recommends that the Bureau of Information Resource Management conduct an in-depth review of the entire agency IT portfolio to identify potential duplicative systems.

**Recommendation 3:** OIG recommends that the Bureau of Information Resource Management develop and implement, to the extent practicable, a strategy to combine, eliminate, or replace the duplicative systems identified during its review of the entire agency IT portfolio (Recommendation 2).

**Recommendation 4:** OIG recommends that the Bureau of Administration develop and implement a methodology for identifying requisitions of or exceeding \$10,000 that have not been properly identified as IT-related acquisitions.

## APPENDIX A: PURPOSE, SCOPE, AND METHODOLOGY

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The Office of Inspector General (OIG) conducted this compliance follow-up audit to determine whether the Bureau of Information Resource Management (IRM) took actions sufficient to warrant the closure of seven specific recommendations from the *Audit of the Department of State Process To Select and Approve Information Technology Investments* (AUD-FM-16-31, March 2016), or whether additional actions are needed to improve the IT investment selection and approval process.

OIG's March 2016 report included 30 recommendations. OIG followed up on seven (Recommendations 8, 10-14, and 17) of those recommendations during this compliance follow-up audit. Specifically, OIG selected recommendations from the report for follow-up that were related to the selection of IT investments and were open and considered resolved, pending further action.

OIG conducted this audit from January 2020 to February 2021 at IRM and the Bureaus of Consular Affairs, Diplomatic Security, and Administration in the Washington, DC, metropolitan area. OIG faced delays in completing this work because of the COVID-19 pandemic and resulting operational challenges. These challenges included the inability to conduct most in-person meetings, limitations on OIG employee's presence at the workplace, difficulty accessing certain information, and related difficulties within the Department, which also affected the Department's ability to respond to OIG requests. In addition, OIG needed to prioritize mandated work, such as the annual audit of the Department's information security program, which subsequently delayed the completion of this report. OIG conducted this audit in accordance with generally accepted government auditing standards. These standards require that OIG plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for the findings and conclusions based on the audit objective. OIG believes that the evidence obtained provides a reasonable basis for the findings and conclusions based on the audit objective.

To gather information for this audit, OIG interviewed key Department officials involved in selecting and approving IT investments. OIG also obtained and reviewed documents, records, data, and other evidence from IRM and the Bureau of Administration. OIG obtained and reviewed Ariba<sup>1</sup> and Integrated Management Analytics, and Technology Resource for Information Exchange (iMatrix) records. OIG researched and reviewed regulations and guidance from the Office of Management and Budget (OMB), National Institute of Standards and Technology, and the Foreign Affairs Manual.

### **Data Reliability**

During this compliance follow-up audit, OIG used computer-processed data from iMatrix and Ariba. The reliability of each dataset is described in the following paragraphs.

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<sup>1</sup> Ariba is the procurement module of the Integrated Logistics Management System. Ariba enables customers to electronically submit purchase requests for goods and services.

***iMatrix***

During the mandated annual audit of the Department's information security program, the auditor assesses the sufficiency of data included in iMatrix, including whether the listing of systems is complete and accurate. In addition, during this compliance follow-up audit, OIG reviewed information about the system and interviewed officials. For example, OIG reviewed iMatrix field descriptions and attended training on how to submit investment information in iMatrix. Furthermore, to assess the completeness of the data on reorganizations, OIG confirmed with Bureau of Administration officials that the bureau did not have any IT portfolio reorganizations during the scope period. OIG also compared a list of IT investments submitted to OMB for FY 2021 with iMatrix information and did not identify any discrepancies. As a result of this work, OIG determined that the data were sufficiently reliable for the purposes used in this compliance follow-up audit.

***Ariba***

During this compliance follow-up audit, OIG reviewed information about the system and interviewed officials. To assess the reliability of data in Ariba, OIG tested a sample of 24 procurements from January to March 2020 flagged as an IT acquisition in excess of \$10,000 to verify that the Chief Information Officer (CIO) reviewed and approved the acquisitions and did not identify exceptions. However, during the project, OIG identified 15 (29 percent) of 51 requisitions that appeared to be IT-related that were not routed to the CIO for approval. The discrepancies identified were significant, and OIG determined that the data included in the "IT Request" field in Ariba were not of adequate quality. OIG included details of the deficiencies it identified with Ariba data in the Compliance Follow-Up Audit Results section of this report.

**Work Related to Internal Control**

During the compliance follow-up audit, OIG considered several factors, including the subject matter of the project, to determine whether internal control was significant to the audit objective. Based on this consideration, OIG determined that internal control was significant for this audit. OIG then considered the components of internal control and the underlying principles included in the *Standards for Internal Control in the Federal Government*<sup>2</sup> to identify internal controls that were significant to the objective. Considering internal control in the context of a comprehensive internal control framework can help auditors determine whether underlying internal control deficiencies exist.

For this compliance follow-up audit, OIG concluded that two of five internal control components from the *Standards for Internal Control in the Federal Government*—Control Activities and Monitoring—were significant to the audit objective. The Control Activities component includes the actions management establishes through policies and procedures to achieve objectives and respond to risks in the internal control system, which includes the entity's information system. The Monitoring component relates to activities management

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<sup>2</sup> GAO, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

establishes and operates to assess the quality of performance over time and promptly resolve the findings of audits and other review. OIG also concluded that four of the principles related to the selected components were significant to the audit objective as described in Table A.1.

**Table A.1: Internal Control Components and Principles Identified as Significant**

<b>Components</b>	<b>Principles</b>
Control Activities	Management should design control activities to achieve objectives and respond to risks.
Control Activities	Management should implement control activities through policies.
Monitoring	Management should establish and operate monitoring activities to monitor the internal control system and evaluate the results.
Monitoring	Management should remediate internal control deficiencies on a timely basis.

**Source:** OIG generated from an analysis of internal control components and principles from the Government Accountability Office, *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014).

OIG then interviewed Department officials, reviewed documents, and performed walkthroughs of the process to obtain an understanding of the internal controls related to the components and principles identified as significant for this compliance follow-up audit. OIG performed procedures to assess the design, implementation, and operating effectiveness of key internal controls. Specifically, OIG:

- Assessed investment reorganizations for IRM, the Bureau of Diplomatic Security, and the Bureau of Consular Affairs to determine if the investments were captured in iMatrix.
- Compared the Department’s Capital Planning and Investment Control Guide to OMB Circular A-130<sup>3</sup> to identify discrepancies.
- Assessed IRM’s IT reviews and assessments to identify potential duplicative investment submissions.
- Determined whether the CIO’s designees reviewed IT-related Ariba procurement entries that exceeded \$10,000, as required.<sup>4</sup>

Internal control deficiencies identified during the audit that are significant within the context of the audit objective are presented in the Compliance Follow-Up Audit Results section of this report.

## Sampling Methodology

OIG’s sampling objectives were to select a sample of bureaus for testing, select a sample of IT investments from iMatrix to determine whether the Department included sufficient details in the system, select a sample of IT concept assessment forms to determine whether the Department assessed the possibility of duplicative systems, and select a sample of procurements from Ariba (some that were identified as IT-related and some that were not

<sup>3</sup> OMB Circular A-130, “Managing Information as a Strategic Resource,” July 2016, § 5.

<sup>4</sup> Cable 19 State 102126.

identified as IT-related) to determine whether the CIO had sufficient oversight of IT procurements.

### ***Post Selection Methodology***

OIG selected four bureaus in which to perform testing. OIG selected three of the bureaus—the Bureaus of Information Resource Management, Diplomatic Security, and Administration—because these bureaus were also included in the prior audit. OIG selected the Bureau of Consular Affairs because it reported an IT investment reorganization relevant to the scope of the audit.

### ***Ariba Procurements Sample Selections***

OIG judgmentally selected to review procurements that occurred in the first quarter of 2020. OIG used professional judgement in selecting the scope period of the procurements, on the basis that a 3-month period would be sufficient to accomplish the sampling objectives. OIG selected the most recent quarter at the time of testing to provide insight into the current control environment.

Ariba uses an IT request indicator field to initiate a CIO review and approval workflow. To determine if the IT request indicator field is appropriately used, OIG generated a report of procurements from January to March 2020 that did not identify the procurement as an IT request in the indicator field and identified 723 procurements. OIG filtered the data and identified 51 procurements that exceeded \$10,000. For those 51 procurements, OIG assessed the description field to identify potential IT procurements that were not routed to the CIO for review and approval as required.

To determine if the CIO appropriately approved IT acquisitions routed in accordance with the Ariba workflow, OIG generated a report of IT procurements from January to March 2020 and identified 510 procurements. OIG filtered the data and identified 24 procurements that exceeded \$10,000. For those 24 procurements, OIG reviewed the system descriptions, CIO review comments, approval records, and order dates to confirm whether the CIO appropriately reviewed and approved IT procurements prior to acquisition.

### ***iMatrix Categories Sample Selections***

iMatrix contains 13 categories of information about each major investment. OIG judgmentally selected for review 5 of the 13 categories: General Information, Performance, Costs, Documents, and Manage Systems/Assets. These categories were selected on the basis of the OIG's professional judgement that these categories held the most critical information about investments. Each category contains investment information captured in both required and non-required fields. From the selected categories, OIG further used professional judgement to select 16 fields, focusing on required fields, to determine if bureaus were including sufficient information about IT investments.

### ***Other Sample Selections***

OIG received an iMatrix report from IRM that identified the 133 IT investments submitted to OMB for budget fiscal year 2021. To determine whether sufficient IT investment details were captured in iMatrix, OIG reviewed the data in the fields for 20 of the 133 investments. Additionally, OIG received data from IRM that identified 86 IT concept assessments performed in FY 2019. OIG reviewed 15 of 86 forms to determine if IRM appropriately reviewed and identified potential duplication of other proposed concepts or of existing systems in the IT portfolio. In both cases, OIG used a non-statistical random sampling methodology<sup>5</sup> to select the samples. OIG used professional judgement, in consultation with OIG's statistician, to identify feasible sample sizes to accomplish the sampling objectives.

### **Prior Office of Inspector General Reports**

The Background section of this report summarizes the results of *Audit of the Department of State Process To Select and Approve Information Technology Investments* (AUD-FM-16-31, March 2016).

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<sup>5</sup> In a non-statistical random sample, all units within a universe stand an equal chance of being selected.

## APPENDIX B: BUREAU OF ADMINISTRATION RESPONSE

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**United States Department of State**

**Washington, D.C. 20520**

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June 30, 2021

### MEMORANDUM

TO: OIG/AUD – Ann E. W. Stoehr

FROM: A/OPE/AP – John C. Dockery 

SUBJECT: Compliance Follow-Up Audit of the Department of State Process To Select and Approve IT Investments (AUD-IT-21-XX)

Thank you for the opportunity to provide a response to the subject report. The point of contact for this report is the A/OPE Front Office ([A-OPEFrontOfficeAssistants@state.gov](mailto:A-OPEFrontOfficeAssistants@state.gov)).

**Recommendation 4.** OIG recommends that the Bureau of Administration develop and implement a methodology for identifying requisitions of or exceeding \$10,000 that have not been properly identified as IT-related acquisitions.

**Management Response to Draft Report (06/30/21):** The Bureau of Administration concurs with recommendation 4 and will work collaboratively with IRM to develop and implement the best approach and policy doctrine for identifying requisitions of or exceeding \$10,000 that are not properly identified as IT-related acquisitions.

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Approved: A/OPE/AP John C. Dockery

Drafter: A/OPE – Alicia Rau, cell: (571) 296-1488

Cleared: M: Kevin Brendle (OK)  
M/SS: Sandra Cimino (OK)  
A/EX: Joseph McGuire (Info)  
A: Myron Hirniak (OK)  
IRM/EA: Craig Hootselle (No Response)  
IRM/BP/SPO: Joshua Schuttloffel (OK)  
A/OPE: Vince Chaverini (OK)  
A/OPE/AP: John Dockery (OK)  
A/OPE/AP/PD: Sharon James (OK)  
A/OPE/AQM: John Stever (OK)

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## ABBREVIATIONS

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CIO	Chief Information Officer
CPIC	Capital Planning and Investment Control
FITARA	Federal Information Technology Acquisition Reform Act
iMatrix	Integrated Management Analytics, and Technology Resource for Information Exchange
IRM	Bureau of Information Resource Management
ITEC PMO	IT Executive Council Program Management Office
OIG	Office of Inspector General
OMB	Office of Management and Budget

## OIG AUDIT TEAM MEMBERS

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Ann Stoehr, Director  
Information Technology Division  
Office of Audits

Imran Salim, Audit Manager  
Information Technology Division  
Office of Audits

Edward Lane, Information Technology Specialist  
Information Technology Division  
Office of Audits

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