Statement of Work

For

Complete Database and Online Applications and eGovernment Services to Manage The Commissioner of Political Practices

This Statement of Work (SOW) is made and entered by and between the Montana Commissioner of Political Practices and StoneRiver. This SOW incorporates by reference the terms and conditions of Contract Number SPB06-1263B in effect between the State and StoneRiver. In case of any conflict between this SOW and the Contract, the Contract shall prevail. The Agency and Contractor agree as follows:

Between:	*Commissioner of Political Practices*
And:	*StoneRiver*
Prepared by:	COPP STAFF
Effective Date:	October 4, 2013
Under Contract #:	SPB 06-1263B
Under Contract Name:	Master Contract for IT Services

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Introduction

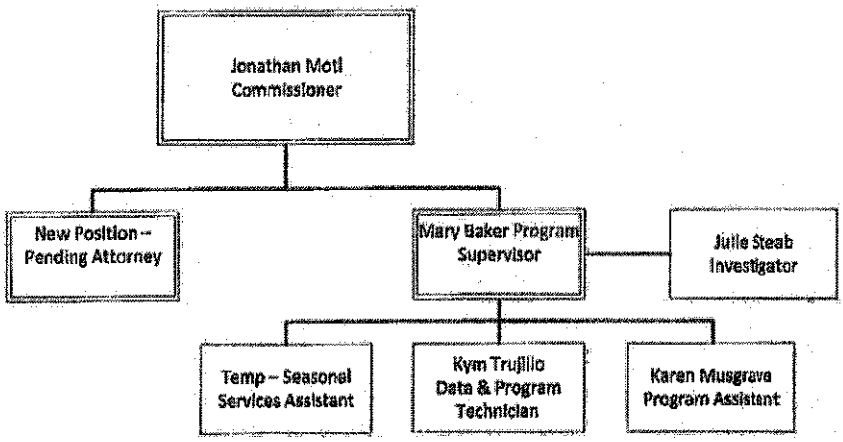
Commissioner of Political Practices (COPP)

Mission Statement

To monitor and to enforce, in a fair and impartial manner, campaign practices and campaign finance disclosure, lobbying disclosure, business interest disclosure of statewide and state district candidates, elected state officials, and state department directors, ethical standards of conduct for legislators, public officers, and state employees, and to investigate legitimate complaints that arise concerning any of the foregoing.

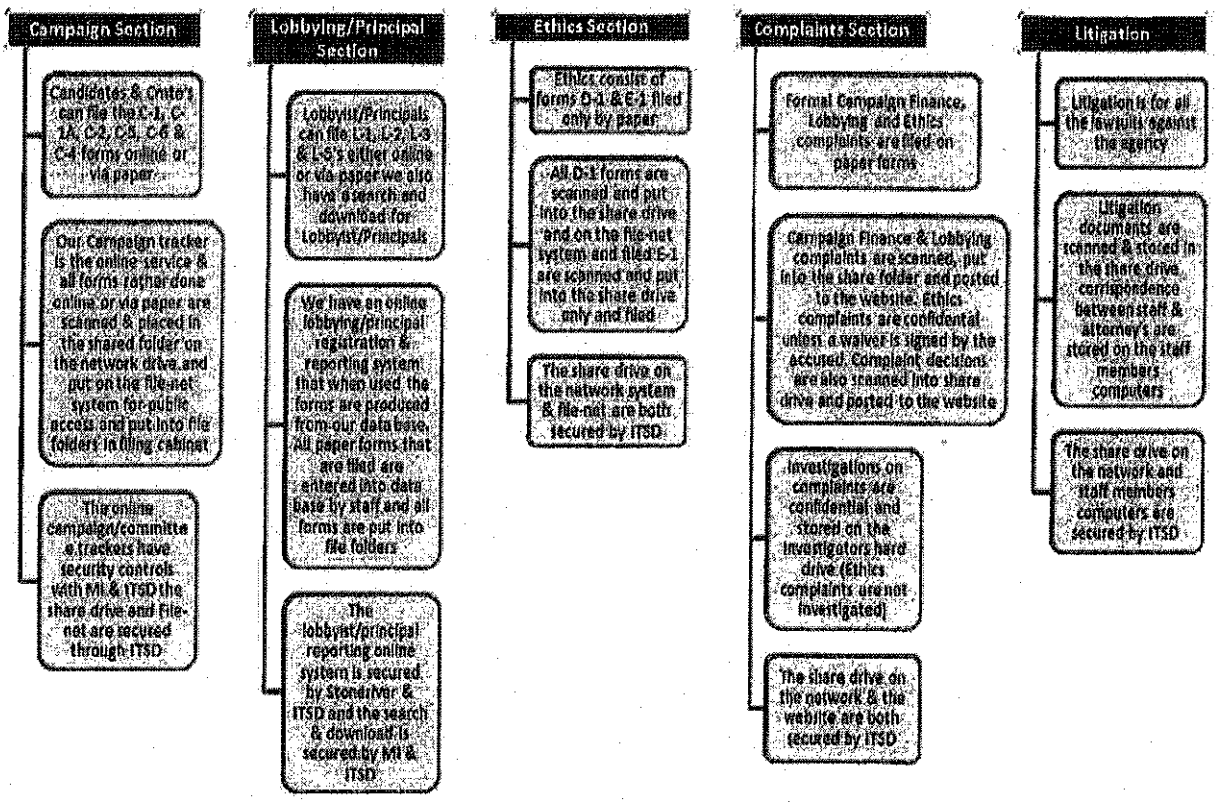
COPP Organization Chart

The following is the current structure of the COPP:



BUSINESS PROCESS SECTIONS

The following are the business processes that the COPP is responsible for by section.



Background

- The COPP is in need of an all-encompassing database which will consolidate all of the current and anticipated future business processes into one central database and allow for remote access.

- The COPP currently has their own Campaign Tracker System that is an ORACLE Forms database and a mixture of various checklists to track various business processes. The lack of a consolidated database has resulted in lost documents, delays in processing, and overlapping schedules for staff members. The COPP's senior management team has reviewed custom developed software, internally developed software, and commercial off the shelf (COTS) software application. The COPP has also talked with other states regarding their automation and solution choices. At this time, the best option for COPP appears to be the reprogramming of their current system.

- Due to the reprogramming of a system the COPP already has a full workload for our personnel. COPP is looking for an independent vendor to provide reprogramming of CAMTRACS system and the implementation of the system to meet COPP business requirements.

Objectives

The objective of this SOW is to obtain service for the reprogramming of our current CAMTRACS system. The COPP also requires the selected vendor to provide a team of IT professionals to provide services in Project Manager, Implementation Services, Trainer, Quality Assurance, Technical Services and a Software Development for conversion and implementation of the system. The following requirements will be required to be performed:

- Reprogram current CAMTRACS System into state of the art IT system environment
- Provide Project Management Services.
- Provide Requirements Gathering Services/Business Analysis
- Provide Training
- Provide Quality Assurance/Testing
- Provide Conversion Services
- Provide Future Technical Services
- Provide All Source Code to COPP

System Users

In order to size the applications, the following are estimates for the number of users for the proposed COPP system.

Internal Users:
Network 10

External Users:
Web 1,000

Total Users: 1,010

Current Environment

The COPP is a Microsoft-Intel shop, and requires the proposed solution to utilize the following minimum software versions (when applicable):

Microsoft Office 2007 (or later)

Java Development tools (Oracle)

ORACLE 11i

ORACLE Forms and Reports

Internet Explorer

Mozilla Firefox

10 years of data to be converted from 2002 to current date – there are approximately 750,000 to 1,000,000 individual transactions to be converted.

Staffing Roles and Responsibilities

Staffing

The COPP project requires that the contracted staff members will be responsible for all deliverables as outlined in this SOW. Those individuals will have a skill set in project management, planning, programming and business process analysis. Experience in successful planning, development and integration efforts is required.

Staff member or members are expected to work from 20-40 hours a week with COPP staff and will have workspace available within COPP facilities in order to complete the project. The contracted staff member or members will report directly to the COPP project manager and work under the guidance of the COPP.

The COPP's Project Manager
Name: Mary Baker
Agency: COPP
Address: 1205 Eight Avenue
PO Box 202401
City: Helena
State & Zip: Montana, 59601
Phone: 406-444-2942
Email: mabaker@mt.gov

Contractor Staff, Roles and Responsibilities

The Contractor shall submit, with their proposal, the level of staff that will participate in the project, along with the roles and staffing responsibilities of each of the staff members. The proposal shall detail the organization of project staff, location of project staff (onsite or offsite), staffing levels during all phases of the project, and clearly define the strategy for managing communication between local and remote staff. The Contractor shall provide a project and organizational chart showing all personnel by name and classification who are assigned to this project and their related responsibilities. Detail in a roles and responsibilities matrix the staff function performed, hours, rates, cost as well as individuals key to the project.

Staffing Requirements:

- The COPP requires at least one key staff be located onsite full-time, or be immediately available, at a state-provided facility.
- Contractor proposed key staff shall be available after hours as required by the COPPs' Project Management. Availability may be satisfied by on-call, telephone communications and on rare occasions, physical attendance onsite as required.
- Contractor project personnel may not be assigned new or additional contract assignments outside the State of Montana contract, reassigned, replaced, or added during the time they are directly working on this assignment without the prior written consent of the COPP. Should a key staff position be vacated, the Contractor shall provide for continuity of the position's responsibilities within five (5) business days. The Contractor must propose replacement personnel within ten (10) business days. The Contractor must provide resumes of qualified replacement personnel, as well as the opportunity for the COPP to interview and approve any potential replacement for key personnel.
- The COPP reserves the right to request alternative staff and require a change in the Contractor's project personnel. In the event a change is required, the COPP shall be provided the opportunity to interview and approve potential replacements for key staff. The COPP reserves the right to approve all Contractor staff assigned to this project.
- Contractor may, with prior written permission from the COPP enter into subcontracts with third parties for its performance of any part of Contractor's duties and obligations. The State of Montana expressly consents to the Contractor's use of the Subcontractors designated in its Response for the provision of the services specified in the response. Any such approval may be rescinded at the State's sole discretion. The Contractor is responsible and liable for the proper performance of, and the quality of any work performed by, all Subcontractors and their compliance with the SOW and the subcontract terms and conditions. All subcontracts shall be made in writing and copies provided to State upon request. The State has the right to refuse reimbursement for obligations incurred under any subcontract that do not comply with the terms and conditions of the contract or this SOW.

Roles and Responsibilities Matrix

Function	*Workgroup/Individuals*	*Primary Responsibility*
Design planning and analysis for reprogramming	*StoneRiver staff*	• Project Planning • Project Definition • Cost Benefit Analysis • Interviewing and soliciting requirements • Process flow analysis • Stakeholder management • Managing and meeting customer expectations • Presenting solutions and options

		• Risk Management • Meeting facilitation • Conversion of COPP's current system, testing, training and implementation of converted system
Approval of System Design and implementation	*COPP Staff* • Mary Baker COPP PM	• Monitor system design progress • Ensure adherence with COPP guidelines and best practices • Requirements verification • User acceptance testing • Final approval of system development and implementation
Project Manager	Kym Trujillo, Project Manager	• Daily oversight and tactical direction • First point of issue escalation and assistance • Ensure SOW objectives are reached
Project Owner	COPP commissioner	• Ensure resources are available for successful completion of project • Final point of escalation for project issues • Responsible for approval of project change (scope, schedule, and budget.)

Assumptions

- COPP assumes that reprogramming will include migrating the existing Data to the new system. If the initial analysis recommends a different approach, project scope may change considerably.
- COPP assumes challenges with providing staffing and workload recommendations, but believes the contractor will be responsible for all recommendations to multiple interested parties. COPP assumes that the contracted party will do their best to be impartial and focus on the key project objectives of service to the citizens of Montana and operational efficiency.
- COPP acknowledges the number of new screens to be designed in this project is an unknown, but focusing on current user needs it is assumed to be no more than five screens.
- The planning, approach, and expected project results of the Project are based on the following key assumptions:
    1. Existing applications are capable of incorporating the additional functionality with minimal modifications.
    2. No significant changes to scope will be introduced to the project.
    3. No unforeseen technical restrictions will surface during the design phase.
    4. Appropriate COPP resources will be made available to participate in the project and top priority will be afforded all project activities.
    5. Appropriate StoneRiver resources will be made available to the project and top priority will be afforded all project activities.
    6. Appropriate SITSD resources will be made available to the project and top priority will be afforded all project activities.
    7. Any needed coordination or support with Montana Interactive will not cause any delay in project progress.

Risks

- COPP staff is operating near capacity. The contractor's staff will need to schedule, follow-up and meet with COPP staff while considering their workload. The project manager and leadership staff are available to assist in securing COPP staff time when needed, but it may run the risk of causing project delay due to other priorities.
- The SITSD produced a Risk Assessment for Candidate Reporting Service for COPP. In this report they identified eight major factors that need to be addressed in COPP's current and new system requirements. This report is in **Appendix A** of this document.

Scone - Project Scope Definition

Inclusions

- The focus of this statement of work is producing a complete project plan and implementation of the new COPP system.

Deliverables

- The new COPP system will contain the following functions and requirements. There are approximately 65 screens to be converted and approximately 5 new screens to be developed. A sampling of the screens can be found under CAMTRACS Screens.

- These functions and requirements can be accomplished reprogramming of an approved Political Practice system:

- COPP Software Required Applications
  - Candidate Registration
  - Campaign Registration
  - Committee Registration
  - Candidate Election Information
  - Candidate Tracking
  - Campaign Tracking
  - Committee Tracking
  - Lobbyist/Principal Registration (modifications as needed)
  - Lobbyist/Principal Tracking (As needed)
  - Financial/Accounting (TBD During Development)
- Web Pages
  - Convert current web pages
  - Add new enhancements for users
- Issue Tracking
  - Track complaints and issues at COPP
  - Interface to web mail
- Report Generating Functions
  - Generate required reporting as defined in the Montana Code Annotated
  - Ad hoc reporting for all applications
- Search Functions
  - Search for Candidate/Committee/Lobbyist
  - Ad hoc search features for all data
- Help Menus
  - Help menus available for all screens
  - User maintained helps
- Conversion of existing CAMTRACS data
  - Data Conversion to new system
  - Data Mapping
  - Data Migration

- Project Management
  - Project Schedule defining roles/responsibilities
  - Communications and Change Management Plans
  - Monitoring/Altering Project Schedule /Resources etc. as appropriate
  - Meeting Management
- Installer/Developer
  - Generate code if required
  - Install required software to support the system
  - Install systems
  - Experienced in all of the systems
  - Facilitation skills
- Trainer
  - Train COPP Staff in use of system
  - Experienced in all applications
  - Facilitation skills
- System Testing
  - Provide Test Plan
  - User Acceptance Testing
- Quality Assurance
  - Facilitation skills
  - Functional Requirements gathering
  - Business Rules identification
  - Detailed Requirements documented
  - Confirmation with subject matter experts and stakeholders
- System Code
  - All source code must be included
  - All new programming will be property of COPP including source code
- Future System Enhancements
  - Provide ongoing support of system
  - Ability to make changes per Montana Statutes

Product Scope

Product In Scope

Product scope defines the primary functions that will be included in the systems development project. The following products are considered in scope of this project:

- Home Page
- Security – for both adding and reporting
- Candidate Landing Page
- Candidate Add / Modify
  - Calendars & Control Data
  - CPP Administration for access, add & modify campaigns
    - Security Management
    - E-mail & Notifications
    - Existing Follow-up Reports
    - Filing approvals
- Candidate Reporting:
  - C1 & C1A – Campaign Practices (add & modify)
  - C3 – Code of Practices
  - C5A – Contributions Reporting
  - C5B – Expenditures Reporting
  - C5C – Debts & Loans Not Paid
  - C5D – Corrections
  - CPP Administration for Campaign Reporting
    - E-mail & Notifications
    - Existing Follow-up reports
- Committee Reporting
  - C-2 – Committee Registration (add & modify)
  - C-4 – Incidental Cmte. (Schedules A,B,C)
  - C-6 – Committee Financial Report (Schedules A,B,C,D)
  - C-7 – Last minute Contributions
    C-7E – Last minute expenditures
- Search and Ad-Hoc Reporting:
  - All existing search features for candidates and committees.
  - Improved ability to search and filter results.
  - All existing ad-hoc reports for candidates, campaigns and committees.
  - New ad-hoc reports to retrieve information about candidates, campaigns and committees.

In addition to the Candidate, Campaign and Committee functions the scope of work includes:

- Modifications to existing Lobbyist / Principal application only as needed to properly function in co-existence with the modified COPP systems infrastructure.
- Conversion of existing Candidate, Campaign and Committee data into any new database structures that may be deemed necessary to properly support the application(s).

Product OUT of Scope

The scope of work does not include:

- Complete redesign and reprogramming of the Lobbyist / Principal Registration Oracle Forms (in-house) or the existing web-based applications.
- Complete redesign of the Lobbyist / Principal's existing database to the extent that a complete conversion of data would be necessary.
- Design and programming of an automated finance or accounting system with full interfacing capability with the state SABHRS system.

Project Scope

Project IN Scope

Project scope includes all activities associated with organizing, planning and executing the project including the following:

- Developing the Project Charter and gaining approval.
- Developing the Project plan and managing the plan / schedule.
- Routine status reporting and monitoring contractor time to budget.
- Developing a Risk Log and monitoring and managing Risk.
- Developing business requirements for the defined project products.
- Managing systems design activities for the project, including:
  - Coordinate design meetings.
  - Document business design requirements.
  - Document technical design requirements.
  - Manage design review and approval processes.
- Coordinating, assigning, and managing assigned project team members.
- Coordinating, assisting, and managing development solution at all phases including:
  - Ensuring technical specifications meet business design requirements.
  - Managing development process through routine status reports.
- Managing testing, including unit, systems, performance, and user acceptance tests.
- Managing deployment:
  - Assisting with a communications plan.
  - Assisting with a training plan and training.
- Monitoring deployed implementation.
- Assisting with completion of updates to business operations, procedure and system user documentation.

Project OUT of Scope

Project scope does ***not*** include:

- Budget management, except as relates to contractor time estimates.
- COPP Personnel assignment, including the assignment of COPP staff to the project and reassignment of their routine work duties (if necessary).

- Purchasing, including the purchase of additional hardware or software needed (if any) for the completion of the project. However, making recommendation for the acquisition is in scope.
- Set-up of production technical environment at SITSD.
- Coordination of approval between COPP and with Department of Administration, SITSD and MI. However, making recommendation for the nature and type of approvals and services required is in scope.
- Internal staff training, including the organization of training sessions and follow-up monitoring of implementation of processes including development of training materials and user's manual updates.
- Post implementation review of systems effectiveness and systems usage analysis will be performed by CPP staff and are not in scope of the project.
- Advertising / announcements and all communications with the public, legislature or other interested parties regarding the project. These activities will be referred to the Commissioner of Political Practices. However, provision of support in development of their communications will be provided as requested.

Work Approach

- Contractor's staff is expected to be independent and operate using industry best business practices.

Completion Criteria and Final Acceptance

Completion Criteria

- All project planning deliverables are to be approved by the Senior Project Manager for completeness and quality.
- All Completion Criteria and Acceptance Criteria are set forth in the COPP Campaign Reporting System Project Charter Version: 1 dated 10/1/2013.

Final Acceptance

- Final project acceptance will occur once the new COPP system oversight members have approved the system and it's functionality to their requirements.

Project Management

- Contractor and COPP staff will meet weekly with the Senior Project Manager in order to monitor progress and assist with issue resolution.

State Policies, Standards and Computing Environment

- Contractor must comply with most current and up to date State Policies, Standards and Computing Environment. Contractor must confirm that the versions they have are the most current. Documents can be found at these web sites:
  Environment - http://www.mt.gov.com/itsd/techmt/compenviron.asp
  Policies - http://www.mt.gov.com/itsd/policy/enterprise.asp
  Standards - http://www.mt.gov.com/itsd/policy/software.asp

Timeline and Period of Performance

Following is a summary of key project milestones and the likely work succession planned for the project at project initiation. The project plan will contain the detailed tasks associated with the following milestones. Tasks involved in meeting these milestones may overlap.

It is the intent of this section to provide general guidelines regarding when certain activities may begin and end. It is not intended to be a definitive project plan. Additionally, this timeline may be modified from time-to-time as the Project unfolds. These modifications will be tracked in the Project Plan and reported by Status Report. If changes to the timeline indicate that critical project delivery timeline is in jeopardy, the issue will be escalated but the project Charter will not be amended. Changes, issue resolution and other modifications to the charter will be documented in status and summarized in project close-out.

MILESTONE	Target Completion*
Phase 0 – Project Initiation	**10/04/2013**
Requirements Complete	11/01/2013
Phase 1 – Registration Phase	**01/01/2014**
Registration Begins	01/09/2014
Phase 2 – Reporting Phase	**03/21/2014**
Reporting Begins	3/31/2014
Phase 3 – Ad Hoc Reporting	**TBD**
Phase 4 – Issues Tracking Phase	**TBD**
Contract Ends	6/30/2014

* *Planned dates are estimates and are dependent on the approval to begin work, the priority given the project, containment of scope and the availability of staff required to complete the project.*

The State has the right to extend or terminate this SOW at its sole discretion.

Compensation and Payment Schedule

Service Fees
Upon final acceptance of a deliverable and receipt of an invoice from Contractor, COPP will pay service fees as provided herein.

Service Fee for Change Requests
Upon final acceptance of all work required pursuant to an approved change request and receipt of an invoice from the Contractor, COPP will pay a service fee based on a per-hour service fee rate of ninety dollars an hour ($90), or an amount otherwise agreed between the parties for the specific change request.

Fixed Service Fee
COPP will pay the following fixed service fee for each completed milestone. The fixed service fee will apply to all services provided, that are not provided pursuant to a change request.

Position	Hourly rate	Hours	Total
Project Manager	$130	640	$83,200
Senior Java Programmer/Analyst	$90	1280	$115,200
Database Analyst	$90	1280	$115,200
Business Analyst/Quality Assurance	$90	1280	$115,200
Total			**$428,800**

Milestone Payments
The fixed service fee for each milestone will be paid based upon delivery and acceptance milestones, as follows:

Milestone	Payment Due for Invoicing
Project Initiation (11/01/2013)	30% of total
Registration Phase (01/09/2014)	30% of total
Reporting Phase (3/31/2014)	20% of total
Ad Hoc Reporting, Issues Tracking Phase	20% of total

Execution/Signature Block

In Witness Whereof, the parties hereto, having read this SOW for Complete Database and Online Applications and eGovernment Services to Manage The Commissioner of Political Practices to Contract Number SPB06-1263B in its entirety, do agree thereto in each and every particular.

Approved	Approved
[Agency]	*[Contractor]*
Signature	Signature
Jonathan Motl	Costa John
Print or Type Name	Print or Type Name
Commissioner	CFO
Title	Title
Date	Date

The contractor is notified that pursuant to 2-17-514, MCA, the Department of Administration retains the right to cancel or modify any contract, project or activity that is not in compliance with the Agency's Plan for Information Technology, the State Strategic Plan for Information Technology, or any statewide IT policy or standard.

Reviewed and Approved by:
Information Technology Services Division
Montana Department of Administration,
per MCA 2-17-512:

Ronald C. Baldwin Date: 10-4-13

State CIO (or Agency Designee for Delegated IT Authority)

Appendix A

State Information Technology Service Division (SITSD) Risk Assessment for Candidate Reporting Service Commissioner of Political Practices (CPP)

STEP 1: SYSTEM CHARACTERIZATION

Output from Step 1 - Characterization of the IT system being assessed, a good picture of the IT system environment, and delineation of the system boundary

The Candidate Registration and Reporting service is a web-based application that is integrated with two Oracle databases. One is built and maintained by Montana Interactive (MI) and stores all data prior to filing with the Commissioner of Political Practices; while the second is built and maintained by StoneRiver and hosted by SITSD. All systems and processes are managed by the Commissioner of Political Practices.

STEP 2: THREAT IDENTIFICATION

Output from Step 2 - A threat statement containing a list of threat-sources that could exploit system vulnerabilities

2.1 Threat Source Identification:

Candidates running for political office are required to register with the Commissioner of Political Practices and file campaign finance reports throughout the election cycle on a scheduled basis. Certain election cycles see more candidates than others with the most occurring during statewide elections; especially those that coincide with Presidential elections.

Candidates running for statewide office incur an extremely high number of contributions and expenditures which translates into significant amounts of data being reported within each campaign finance report. This information can be data entered individually or uploaded as bulk files directly into the Candidate Reporting service. Uploaded data is inserted into both the MI and CPP databases using stored procedures.

A routine practice of many political candidates is to wait until the last hour or often times the very last few minutes to file their campaign finance report. Given the sheer number of candidates and the potential amounts of data being reported, there is a risk of a tremendous load on the service in a very short amount of time which could potentially lead to failure.

2.2 Motivation and Threat Actions:

The Commissioner of Political Practices has indicated his intent to move forward with a mandate that will require all statewide candidates to file their campaign finance reports electronically. This will increase the number of customers utilizing the service as well as the amount of data being reported.

STEP 3: VULNERABILITY IDENTIFICATION

Output from Step 3 - A list of the system vulnerabilities that could be exercised by the potential threat-sources

Table 1- Potential Vulnerabilities Table

Vulnerability	Threat Source	Threat Action
A massive peak load	Users of the Service	In the case that this vulnerability occurred, the service would need to be restarted.

3.1 Vulnerability Sources:

The overall usage of the service to the point of load failure.

3.2 System Security Testing:

Stress testing information – the service has been load tested and has demonstrated its ability to handle the projected traffic over a period of a few hours, however, it cannot handle the traffic if most of the filings occur at the same time.

The most recent stress test load testing was conducted December 13-15, 2011. The load tests were based upon historical data from Commissioner of Political Practices.

Races	# Candidates	# Reports required	Contributions	Expenditures	Outstanding Debts	Corrections
Statewide	31	16	2183	93	0	0
State District	335	4	323	25	14	0
County	313	4				

A stress test was conducted as part of the load testing. This test was designed to simulate a massive peak load as if all state-wide candidates filed at the same time. The test included 40 statewide candidates all uploading 5000 Schedule A records, 500 Schedule B records and 25 Schedule C records at the same time.

The stress test was unsuccessful. The service experienced load failure and stopped functioning when all test users uploaded reports at the same time. All test users were unable to complete the upload process at the time the service stopped functioning. This was due not only to the volume of reports beign filed but also the number of records included in each filing.

STEP 4: CONTROL ANALYSIS

Output from Step 4 - List of current or planned controls used for the IT system to mitigate the likelihood of a vulnerability being exercised and reduce the impact of such an adverse event

4.1 Control Methods:

Various efforts will be pursued to attempt to lessen the possibility of a massive peak load on the Candidate Reporting service including:

- *Outreach* – the Commissioner of Political Practices will contact all candidates prior to and throughout each reporting deadline to encourage them to file their reports early and not wait until the last hour

- *Alter candidate reporting deadlines* – the Commissioner of Political Practices will pursue legislation to alter the reporting deadlines for the different candidate types to prevent all candidate types from having to file campaign finance reports on the same day. Statewide candidates still pose a significant challenge given the large amounts of data they have to report, however, eliminating all other candidate types should help minimize the load on the service.
- *Limit related service availability* – as soon as campaign finance reports are filed they can be viewed through the Candidate Search and Download service. The immediacy of the report availability is often the reason for delayed filing. The Commissioner of Political Practices intends to limit the availability of the Search and Download site on reporting deadline days in the hopes that this will make candidates more comfortable with filing earlier in the day.

STEP 5: LIKELIHOOD DETERMINATION

Output from Step 5 - Likelihood rating (High, Medium, Low)

Table 2 - Likelihood Definitions

Likelihood Level	Likelihood Definition
High	The threat-source is highly motivated and sufficiently capable, and controls to prevent the vulnerability from being exercised are ineffective.
Medium	The threat-source is motivated and capable, but controls are in place that may impede successful exercise of the vulnerability.
Low	The threat-source lacks motivation or capability, or controls are in place to prevent, or at least significantly impede, the vulnerability from being exercised.

The likelihood of a massive peak load vulnerability occurring is high.

STEP 6: IMPACT ANALYSIS

Output from Step 6 - Magnitude of Impact (High, Medium, or Low)

Table 3 - Magnitude of Impact Definitions

Magnitude of Impact	Impact Definition
High	Exercise of the vulnerability (1) may result in the highly costly loss of major tangible assets or resources; (2) may significantly violate, harm, or impede an organization's mission, reputation, or interest; or (3) may result in human death or serious injury.
Medium	Exercise of the vulnerability (1) may result in the costly loss of tangible assets or resources; (2) may violate, harm, or impede an organization's mission, reputation, or interest; or (3) may result in human injury.
Low	Exercise of the vulnerability (1) may result in the loss of some tangible assets or resources or (2) may noticeably affect an organization's mission, reputation, or interest.

The impact of a massive peak load vulnerability occurrence is high.

STEP 7: RISK DETERMINATION

Output from Step 7 - Risk level (High, Medium, Low)

7.1 Risk Level Matrix:

The probability assigned for each threat likelihood level is 1.0 for High, 0.5 for Medium, 0.1 for Low.

The value assigned for each impact level is 100 for High, 50 for Medium, and 10 for Low.

Table 4 - Risk-Level Matrix

Threat Likelihood	Impact		
	Low (10)	Medium (50)	High (100)
High (1.0)	Low 10 X 1.0 = 10	Medium 50 X 1.0 = 50	High 100 X 1.0 = 100
Medium (0.5)	Low 10 X 0.5 = 5	Medium 50 X 0.5 = 25	Medium 100 X 0.5 = 50
Low (0.1)	Low 10 X 0.1 = 1	Low 50 X 0.1 = 5	Low 100 X 0.1 = 10

Risk Scale: High (>50 to 100); Medium (>10 to 50); Low (1 to 10)***

****If the level indicated on certain items is so low as to be deemed to be "negligible" or non significant (value is 1 on risk scale of 1 to 100), one may wish to hold these aside in a separate bucket in lieu of forwarding for management action. This will make sure that they are not overlooked when conducting the next periodic risk assessment. It also establishes a complete record of all risks identified in the analysis. These risks may move to a new risk level on a reassessment due to a change in threat likelihood and/or impact and that is why it is critical that their identification not be lost in the exercise.****

The risk level for a massive peak load vulnerability is 100, or high.

7.2 Description of Risk Level:

Table 5 - Risk Scale and Necessary Actions

Risk Level	Risk Description and Necessary Actions
High	If an observation or finding is evaluated as a high risk, there is a strong need for corrective measures. An existing system may continue to operate, but a corrective action plan must be put in place as soon as possible.
Medium	If an observation is rated as medium risk, corrective actions are needed and a plan must be developed to incorporate these actions within a reasonable period of time.
Low	If an observation is described as low risk, the system's DAA must determine whether corrective actions are still required or decide to accept the risk.

The Commissioner of Political Practices is aware of the risk rating and accepts the risks associated with the massive peak load vulnerability.

STEP 8: CONTROL RECOMMENDATIONS

Output from Step 8 - Recommendation of control(s) and alternative solutions to mitigate potential risk