



A REPORT  
TO THE  
MONTANA  
LEGISLATURE

INFORMATION TECHNOLOGY AUDIT

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*The Impacts of  
Decentralized IT on Data  
Management and IT  
Effectiveness*

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*Department of Fish, Wildlife & Parks*

NOVEMBER 2025

LEGISLATIVE AUDIT  
DIVISION

20DP-05

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IT audits are performed as stand-alone audits of IT controls or in conjunction with financial-compliance and/or performance audits conducted by the office. These audits are done under the oversight of the Legislative Audit Committee, which is a bicameral and bipartisan standing committee of the Montana Legislature. The committee consists of six members of the Senate and six members of the House of Representatives.

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November 2025

The Legislative Audit Committee  
of the Montana State Legislature:

It is a pleasure to present our Information Technology audit of the data, business-IT relationships, and internal controls for business processes and systems managed by Montana Fish, Wildlife & Parks (FWP).

This report provides the Legislature information about how FWP is managing these important technical aspects of its IT operations to achieve enterprise goals and objectives and provide effective IT services. This report includes recommendations for implementing data governance and data management operations, and formalizing practices such as an IT steering committee, internal communications, and enterprise architecture at FWP. We have included a written response from FWP at the end of the report.

We wish to express our appreciation to Montana Fish, Wildlife & Parks personnel for their cooperation and assistance during the audit.

Respectfully submitted,

*/s/ Angus Maciver*

Angus Maciver  
Legislative Auditor



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# MONTANA LEGISLATIVE AUDIT DIVISION

## INFORMATION TECHNOLOGY AUDIT

Data, Relationships, and Controls  
DEPARTMENT OF FISH, WILDLIFE & PARKS

A report to the Montana Legislature

### BACKGROUND

Montana Fish, Wildlife & Parks (FWP) manages Montana's resources to ensure their future abundance for citizens and visitors. This includes Montana's fishery ecosystems with 91 fish species, wildlife habitats for over 600 species across 145,000 square miles, and 55 state parks with 3.2 million visitors in 2024. The agency also oversees 336 fishing access sites and 71 wildlife management areas. To manage these resources effectively, FWP utilizes over 100 distinct software applications, each with its own associated data, separate from the licensing application.

The Technology Services Division (TSD) within FWP supports the agency by managing technology infrastructure, developing software, and providing GIS data and user support.

Division: Technology Services Division (TSD)

Division FTE: [39]

Division Appropriations

FY2026-2027: \$20,578,220

Division Expenditures

FY2026-2027: \$20,578,814

Montana Fish, Wildlife & Parks' data and IT environment mirrors the diversity of resources in the vast ecosystem for which it is responsible. Providing stewardship of these resources while remaining accountable to the Legislature and public requires a careful balance rooted in strong data practices, collaborative business-IT partnerships, and robust internal controls. To maintain that balance, FWP needs to establish data governance, grow its business-IT relationships beyond the boundaries of projects, and strengthen its enterprise architecture.

### KEY FINDINGS:

**The agency does not have data governance to support coordinated data activities across the agency.** Montana Fish, Wildlife & Parks lacks clear roles for data management and a strategy to coordinate across various divisions within the agency. It relies on its divisions and individual data asset owners to set and manage expectations and processes, rather than establishing agency-wide standards.

**The agency lacks operational tools to achieve effective data management.** Montana Fish, Wildlife & Parks does not have a comprehensive business glossary, centralized metadata management, a data quality strategy, or effective data asset lifecycle management. It relies on divisions and individual data asset owners whose knowledge and expertise in implementing such practices vary.

**The agency operates with a dual business-IT relationship model.**

In formal projects, IT effectively manages business expectations and communication, supported by the Project Bureau and the Chief Technology Officer's approach. However, in maintenance and support, IT struggles to meet business expectations, identify stakeholders, and communicate effectively. If the IT strategy is misaligned with business needs, IT will remain reactive rather than proactively enhancing the business.

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For the full report or more information, contact the Legislative Audit Division.

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**Project-focused strategy hinders innovation amid legacy system challenges and technical debt.** The agency emphasizes project-based relationships to address challenges with legacy systems. This approach leads to a focus on system maintenance rather than innovation, as TSD and product owners prioritize keeping systems operational.

## RECOMMENDATIONS:

In this report, we issued the following recommendations:

To the department: 4

To the legislature: 0

### RECOMMENDATION #1 (page 13):

*Governance, Risk Assessment, and Planning*

Montana Fish, Wildlife & Parks needs to collaborate with the State Chief Data Office to create a data governance framework, treating data as a valuable asset. This partnership should aim to develop a data management strategy and clarify roles and responsibilities.

**Department response: Concur**

### RECOMMENDATION #2 (page 17):

*System and Information Management*

Montana Fish, Wildlife & Parks needs to work with the State Chief Data Office to progressively establish data management operations. This includes creating a business glossary, centralizing metadata, developing a data quality approach, and managing the data asset lifecycle.

**Department response: Concur**

### RECOMMENDATION #3 (page 22):

*Governance, Risk Assessment, and Planning*

Montana Fish, Wildlife & Parks needs to form an IT steering committee with a formal charter, defined roles, and executive support. Additionally, it should implement an internal IT communication tool to share priorities, projects, and processes.

**Department response: Concur**

### RECOMMENDATION #4 (page 25):

*Governance, Risk Assessment, and Planning*

Montana Fish, Wildlife & Parks needs to integrate enterprise architecture concepts, including application portfolio management, to identify and reduce technical debt and consistently manage internal controls.

**Department response: Concur**

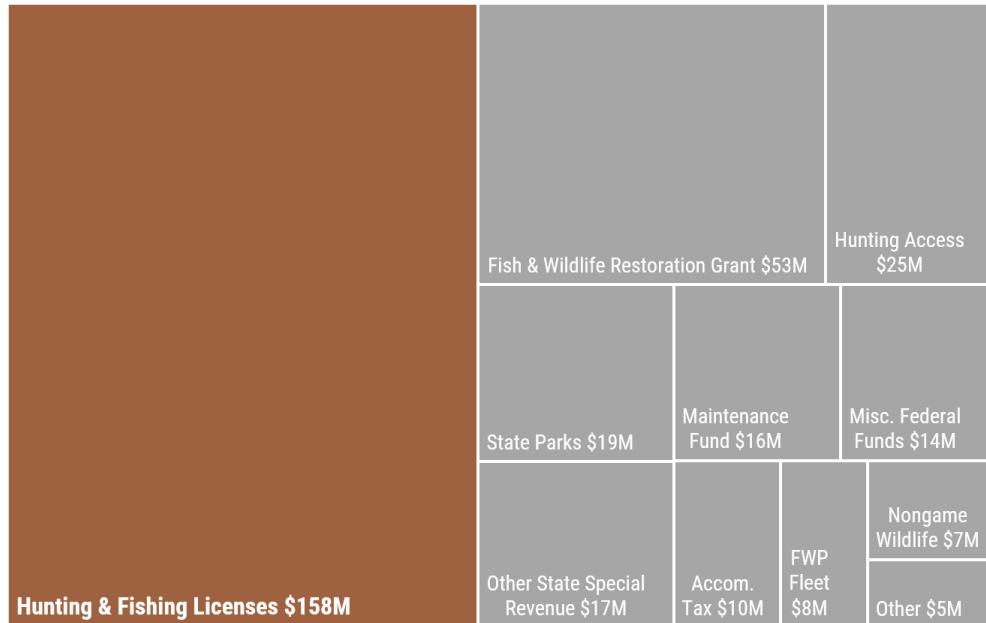
## Introduction

Montana Fish, Wildlife & Parks (FWP, agency) manages the state's resources for both residents and visitors, ensuring their future abundance and availability. The agency balances diverse interests and viewpoints, engages in scientific research, and must be accountable to the public. Effective resource management benefits from input across a range of stakeholders. This makes using data to inform decisions essential for guiding the agency's direction. Using data also improves the overall quality of its choices.

## Licensing Generates Nearly Half of FWP's Funding for Managing State Wildlife Resources

General licenses, permitting fees, and fines form the backbone of FWP's funding. The agency receives no money from the state's General Fund. Instead, its largest revenue source (71.2 percent) comes from state special revenue. General licenses, including those for hunting and fishing, are the largest contributor to the state special revenue, making up 67.0 percent of that fund and 47.8 percent of the agency's total funding.

Figure 1  
Hunting and Fishing Licenses Make Up Almost Half the Agency's Funding



Source: Compiled by the Legislative Audit Division.

While other revenue sources contribute to the agency's funding, licensing is a key aspect of FWP's services. It is crucial that the public can trust the agency's ability to effectively provide those services and fairly distribute licenses. The system that manages licensing for FWP is the Automated Licensing System (ALS), and it is the main focus of the agency. Through the use of ALS, FWP tracks around 300 different types of fishing, hunting, and trapping licenses and permits that fund its missions and achieve its vision.

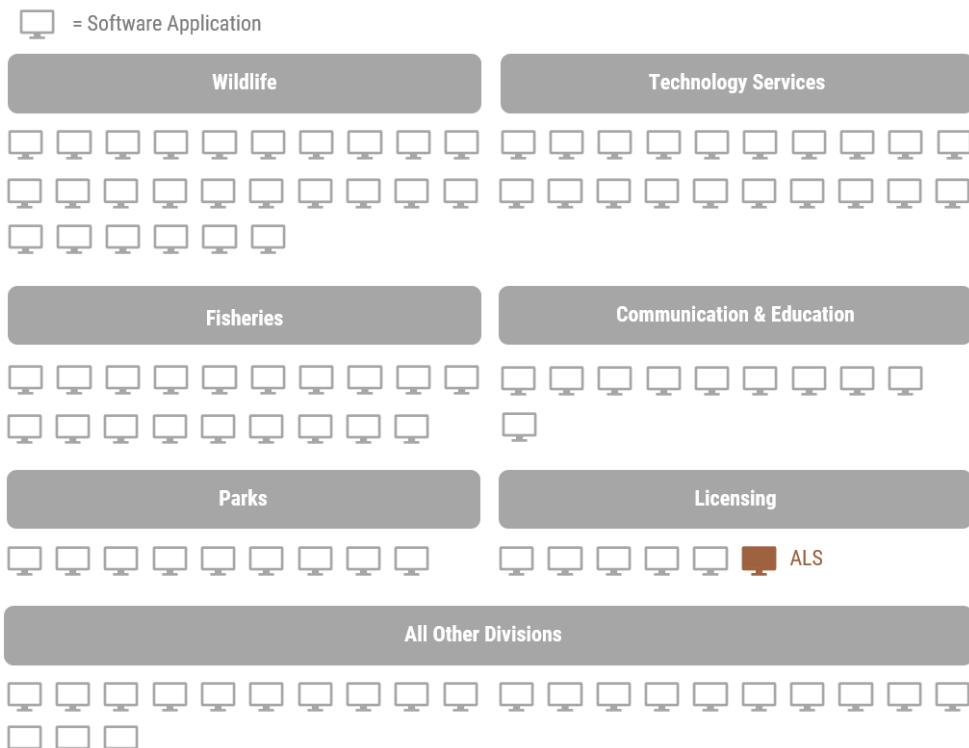
Beyond issuing licenses, FWP is responsible for managing the vast natural resources that help define Montana's identity. These resources include:

- Fishery resources and aquatic ecosystems across 40 drainages in seven ecoregions that are home to 91 species of fish (57 of which are native to the state), as well as several subspecies and hybrid crosses.
- Wildlife habitats and populations of over 600 species of birds, mammals, reptiles, and amphibians over approximately 145,000 square miles (~93 million acres).
- 55 state parks, which saw approximately 3.2 million visitors in 2024, 336 fishing access sites, and 71 wildlife management areas.

Montana Fish, Wildlife & Parks uses over 100 individual software applications that are separate and distinct from ALS. These applications that make up FWP's information technology landscape are shown in Figure 2.

Figure 2  
FWP Software Applications

In addition to the **ALS**, the department uses many other software applications.



Source: Compiled by the Legislative Audit Division.

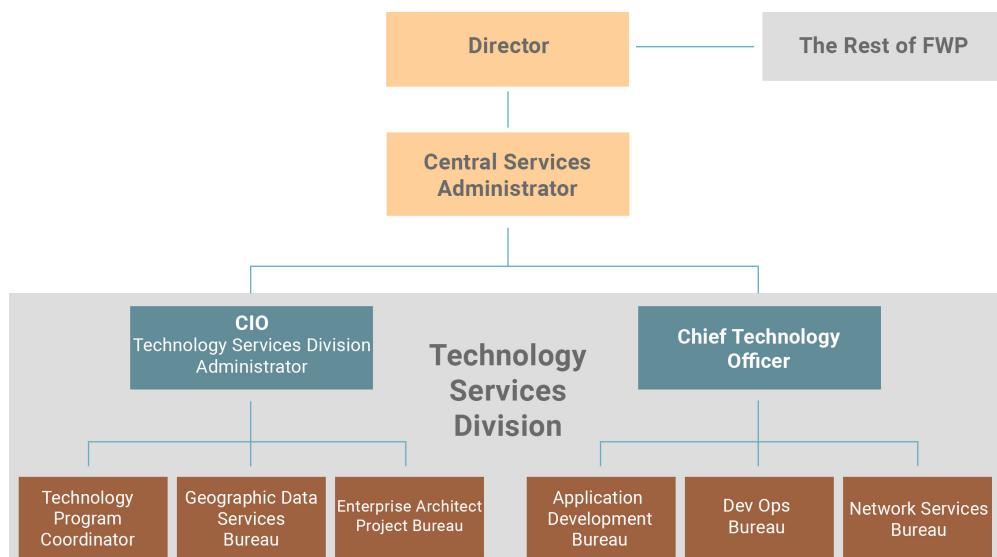
While technological integration remains critical for streamlining operations, the breadth of FWP's mission necessitates a wide array of tools. With responsibilities ranging from wildlife conservation to recreational resource management, the agency's expansive scope is mirrored in its organizational structure and technology needs.

## Organizational Diversity Reflects the Range of Resources FWP Manages

Because the resources under FWP are numerous and varied, the agency's organizational structure is inherently complex. It employs more than 700 staff across seven main divisions, six administrative units, and a separate section for Conservation Policy. The agency also needs to maintain a physical presence throughout the state, so it is further divided into seven regions across Montana, with an eighth region being its headquarters in Helena. Regional supervisors work with division administrators to implement and manage FWP's programs within their regions, according to the direction set by the headquarters. IT follows this model as well, with a division administrator in the Helena headquarters and support personnel disbursed to each region.

The Technology Services Division (TSD) is vital to the agency's mission and supports the use of data to make decisions. It oversees technology infrastructure, website frameworks, and develops custom software solutions, providing guidance to ensure business alignment and continuity. TSD's organizational structure is led by the chief information officer (CIO) and includes a chief technology officer (CTO), a technology program coordinator, and five bureaus, as shown in Figure 3.

**Figure 3**  
**Technology Service Division's Organizational Structure**



**Source: Compiled by the Legislative Audit Division.**

The Projects Bureau, led by the Enterprise Architect, translates business needs into technology solutions and communicates their use to business users across all divisions and regions.

## Ongoing Changes Will Impact How IT Is Managed in FWP

On July 1, 2025, the governor issued an Executive Order (EO, Order) integrating information technology resources and creating an enterprise information technology governance. The governor noted that the State of Montana allocates substantial resources to IT to enhance government services, protect privacy, and improve citizens' quality of life.

In the Order, the governor announced a hiring freeze on all IT positions until further notice. The State CIO has the authority to approve IT positions. The State CIO may also, with approval from the governor, end the hiring freeze. At this time it is unclear how this will impact FWP's IT structure.

## Audit Scope and Objectives

Through our assessment, we identified various factors that increase technology risk within the agency:

- Despite the 66th Montana Legislature's approval for funding in 2019, the agency has not yet replaced the aging ALS. The agency's delayed start suggested it faces challenges in managing large-scale IT projects.
- The agency and TSD support integrating technology into their strategies, but do not have unified data governance. Despite some data handling provisions, the agency lacks policies aligning data management with FWP's mission. Without high-level direction, data management becomes ad hoc and unreliable.
- Recent issues (2022 and 2023) with licensing draws pointed to issues with the ALS. Investigations revealed that IT did not update the draw process with Montana Fish and Wildlife Commission changes (2022), and manual processes for entering quotas introduced an error in issuing special hunting licenses (2023). Although these issues were promptly resolved, they highlight underlying challenges in managing the outdated system.

Montana Fish, Wildlife & Parks' complex governance and management structure affects the data it manages. The agency relies on extensive and diverse data to fulfill its mission. Similarly, IT is extensive and diverse across the various divisions and regions. This creates challenges for business-IT relationships and internal control management to be effective.

Figure 4  
Pros of Centralized IT Resource Integration for State Agencies

### **State Information Technology Resource Integration**



- Centralizes IT resources for non-exempt agencies under the Department of Administration's State Information Technology Services Division, which is led by the State Chief Information Officer
- Gives DOA/SITSD the authority to make enterprise decisions regarding restructuring and operational matters related to IT for those Executive Branch agencies in scope
- Establishes a centralized Integrated Management Office for projects
- Directs the Office of Budget and Program Planning to manage budget authority and position distribution throughout effected agencies
- Mandates agencies' full cooperation

**Source: Compiled by the Legislative Audit Division.**

Therefore, we developed the following objectives:

1. Determine if FWP is managing its data assets across the data life cycle to ensure it can be used to derive insights, make decisions, drive business processes, and achieve enterprise goals and objectives.
2. Determine if FWP is using best practices to improve business-IT relationships and monitor IT controls to successfully meet agency goals and provide effective IT services.

Because FWP maintains a range of data and has numerous software applications, it was not feasible for us to review the entirety of its data and applications. Instead, we narrowed our focus to the most critical applications for our objectives. These included the ALS, the Block Management Agreement contracts management system (BMA), the Enforcement module for ALS, and the Fish Health Access database.

## **Methodologies**

To address our objectives, we developed an evaluation plan for each, based on applicable best practices found in the Control Objectives for Information and Related Technologies (COBIT) framework. While this framework is not required by the state or federal entities, it does provide a set of best practices collected and condensed from the information and technology industry. In the absence of formal state requirements, COBIT provided a practical framework for assessing FWP's data management, the alignment between business and IT, and the effectiveness of its internal control oversight.

While COBIT provides a framework for governing and managing information and technology, it is not exhaustive for all related topics. It also references related guidance in the form of standards, frameworks, and compliance requirements. We incorporated related guidance into our work as well. This guidance included:

- **Data Management Body of Knowledge** - DAMA DMBOK, 2nd Edition, developed by DAMA International, an organization founded to advance data management practices.
- **Guide to the Business Analysis Body of Knowledge** - BABOK v3, developed by the International Institute of Business Analysis (IIBA), a professional organization founded to shape business analysis practices for improved enterprise outcomes.

Specific methodologies included:

- Compared the agency's practices with the practice activities identified by COBIT to determine its capability level for each management practice.
- Discussed the agency's practices with staff.
- Reviewed existing agency documentation to identify alignment with best practices.
- Reviewed job descriptions to identify responsible individuals and groups for activities associated with our objectives.
- Reviewed Montana and Washington resources to identify examples of implementing data governance and management.

While COBIT offers a useful benchmark for assessing FWP's alignment between business goals and IT governance, the absence of formal mandates requires a more proactive, internally driven approach. However, understanding frameworks is just one piece of the puzzle and naturally leads to the broader discipline that supports such control. By prioritizing data governance, organizations lay the foundation for effective information management. More than a framework, it defines the policies and processes that guide data throughout its lifecycle.

# Chapter II - Establishing Data Governance To Improve Data Management

## Introduction

Data governance is the indispensable foundation for managing data, consisting of policies, procedures, and roles. It sets expectations for planning, implementing, and monitoring the control of data assets. Data assets include all technological resources comprising data such as databases, documents, output files, services, systems, or web pages. Data governance provides the authority and structure needed to oversee an organization's data assets effectively.

A data management strategy is a critical part of data governance. It is the plan for delivering, controlling, protecting, and maximizing the value of data and information assets throughout their lifecycles. Data governance and clear strategy set the tone for the organization, while data management executes that vision throughout all operations.

While every organization makes decisions about data, those with formal governance processes apply authority and control more intentionally, allowing them to receive greater value from their data assets.

In the absence of a data management strategy and designated personnel or teams to implement it, individual divisions are left to develop rules and processes for data management. This leads to data silos and data debt in the agency, hindering its ability to develop technology solutions that cross divisional and product lines to provide stakeholders with the information they need when they need it. Our work assessed the current state of data governance and identified potential challenges FWP may face in implementing necessary improvements.

### **Data debt:**

Accumulation of data-related problems over time that hampers long-term growth.

## Montana Fish, Wildlife & Parks Has Not Established Foundational Governance

Montana Fish, Wildlife & Parks is working toward implementing best practices in standardizing business terms and defining data. The agency also has some documentation with respect to roles and responsibilities. However, these practices are not mature or formal enough to effectively manage data across such a complex agency. Additionally, the assignment of resources for data governance and management is minimal and informal. The agency's efforts are hindered by unclear roles and a lack of formal governance, leaving expertise underused. Defining responsibilities and embedding data management professionals into the organization could establish the structure needed to turn early initiatives into a lasting framework.

**Best Practices:** The agency lacks a unified data management strategy and consistent management practices, but emerging statewide frameworks offer useful tools for improving awareness and closing gaps.

**Roles and Responsibilities:** The agency has not formally assigned data management roles or included data management professionals in its structure. Doing so could enhance its understanding of governance concepts.

Without core data governance practices, FWP will struggle to use data effectively to gain insights, make informed decisions, drive business processes, and achieve organizational goals. The agency must overcome the silos that are being created and address the factors that contribute to these silos, such as the focus on licensing.

## **Lack of Data Governance Creates Silos Within FWP Data and Operations**

Agency management oversees a diverse range of resources. Historically, they have preferred to decentralize operations. This approach enables local experts, who possess the most relevant knowledge, to manage their responsibilities effectively. These experts are empowered to tailor their management strategies to suit the specific conditions on the ground.

While this approach may work for managing FWP's resources, decentralization has led to data silos and operational silos.

**Data Silos:** A data silo is data isolated within one unit, making it hard to access, share, or use across teams, which limits collaboration and forces inefficient, manual data handling. During our work, we identified a silo in the form of a database that resides exclusively on a single computer within a particular division. Program staff must manually extract data and input it into other software applications or deliver it to different divisions to facilitate data sharing. Alternatively, they can create a copy of the database and share that copy with the relevant parties. While this highlights a particular data silo within the agency, it is not an isolated case. Many such databases exist.

**Operational Silos:** Operational silos exist when divisions are unable to share information with other units in the same organization. Agency staff indicated that data management responsibility has been delegated to program staff. Through interviews, we identified several issues caused by operational silos. Without centralized guidance, program personnel are unclear about their roles. They also feel unsupported in technical areas. Meanwhile, technical staff focus narrowly on compliance tasks. This focus detracts from their assistance with comprehensive data management.

## **Various Other Circumstances Also Contribute to Silo Creation**

Other significant themes we found in our work include:

- The agency's focus on licensing processes and licensing data managed by ALS, and
- The agency is working to overcome technical debt due to its use of legacy systems.

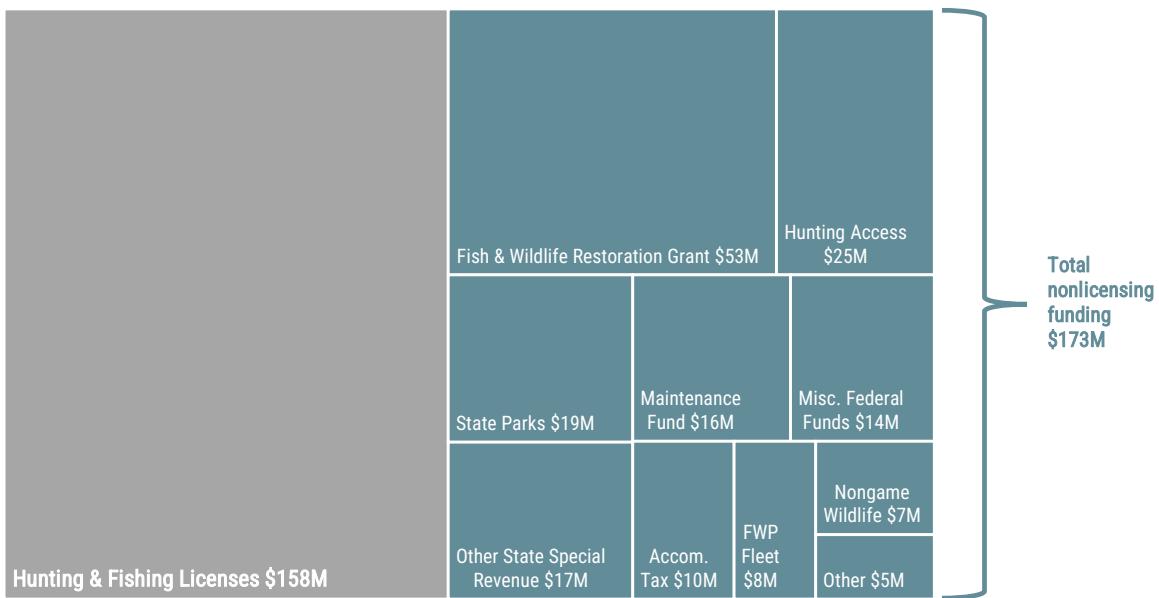
### **Technical debt:**

Accumulation of technology-related problems over time that hampers long-term growth.

In general, technical debt refers to the “debt” that accumulates when teams are unable to address technical issues or opt for suboptimal solutions in pursuit of short-term gains. This is a common occurrence in state government due to the nature of funding. Montana Fish, Wildlife & Parks is not immune to this concept and is working to modernize technology as resources allow. Because this is a slow process, the agency has to balance maintaining its legacy systems (especially ALS) while modernizing them. The architecture and complexity of ALS have left little capacity for modernization across the agency.

While licensing is a crucial aspect of FWP’s services as well as its funding, we see the focus on licensing and ALS as a challenge that FWP has to overcome. It is not reasonable to expect the agency to ignore its funding source or develop a different funding model. Instead, the agency needs to develop a more inclusive view of its data landscape to incorporate more than just licensing. Figure 5 illustrates the amount of funding that comes from sources outside of licensing.

Figure 5  
**Nonlicensing Revenues Provide Over Half of FWP’s Funding**



Source: Compiled by the Legislative Audit Division.

## **Agency Management and Staff Recognize the Importance of Data**

The decentralized approach, along with the agency’s focus on technical resources for ALS has created a territorial mindset within the organization. However, staff also noted that having agency-level direction for data governance was important to them in fulfilling their individual responsibilities. They further felt that it was important to the agency in fulfilling its mission. In the past two legislative sessions (2023 and 2025), FWP has indicated its commitment to being a data-driven organization in its Agency Goals and Objectives. Additionally, during our discussions, agency staff expressed a goal of developing a website that would serve as a one-stop shop for FWP customers. Such a website would enable a customer to buy a license, find information about an area, check available hunting options, and purchase items such as clothing, recreation fees, or campsites.

To determine what is important to its customers, FWP needs to have effective business intelligence (BI), or data analysis aimed at understanding organizational activities and opportunities. Effective BI will enable the agency to anticipate its customers' needs and will reduce the need for legislation to require specific reports to be available. Without foundational data governance in place, the agency risks being unable to meet these goals or provide data effectively and efficiently.

## **Data Governance and Agency-Wide Focus Are Critical for Overcoming Challenges**

With respect to data, there is no single, unifying theme throughout the agency to which all divisions and regions can anchor their own operations. Without a unifying data management strategy, the agency is a collection of divisions, units, and regions rather than a collective working together towards a common goal. Recognizing data's role in FWP's mission and vision will enable the agency to evolve from a mere collection of entities into a cohesive collective. Additionally, valuing all agency data is important because it contributes to the agency as a whole, just as the various species and outdoor sites managed by FWP contribute to the whole state of Montana and those who enjoy its resources.

## **Industry Research Indicates Significant Benefit From Incorporating Data Governance**

Cutting costs by improving process efficiency and timeliness depends upon organization-specific processes and operating expenses. However, industry research offers insight into quantifying cost savings. The US Geological Survey (USGS) asserts that poor data quality, redundant data, and lost data can cost organizations 15 percent to 25 percent of their operating budget. Montana Fish, Wildlife & Parks' base budget for FY2025 was \$133,600,758. Applying the 15 percent–25 percent range provides a cost savings of approximately \$20 million to \$30 million annually.

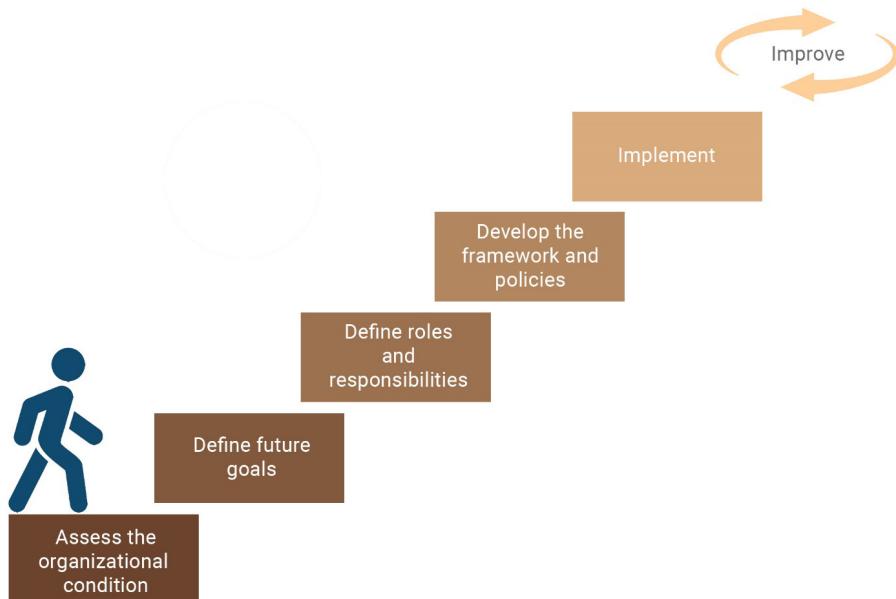
Although the range may initially appear large, it's important to consider that differences between state government agencies and private sector businesses might justify this figure. In the private sector, operating expenses often include substantial salary costs, whereas similar roles in government incur lower costs. However, government agencies are generally perceived as less efficient than private businesses. Specifically, FWP's efficiency in data management is notably low due to data silos, data debt, and numerous outdated databases. Implementing data governance could enhance FWP's efficiency, aligning it more closely with private sector standards. Even if one believes the cost savings estimate from the USGS is excessive, reducing the percentages by half could still result in annual savings of \$10 million to \$16 million.

While this range is highly variable, data governance provides a structure for aligning IT strategy with business strategy for data and data assets. It provides authority and control over the management of data assets, and those organizations that establish data governance increase the value they derive from their data.

## Implementing Data Governance Requires a Systematic Approach With Support

Implementing such practices is more than just a simple change. It requires realigning the strategic focus and shifting mindsets across various divisions. This level of change requires a systematic approach to implementing data governance through specific steps, shown the Figure 6.

Figure 6  
Essential Steps in Establishing Data Governance



Source: Compiled by the Legislative Audit Division.

This kind of approach is more likely to be successful than an ad hoc method. With the agency's large volume of data, wide-ranging programs, and complex business processes, implementing effective data governance will take time. Success will require dedicated resources, expert guidance, and ongoing support.

During our work we reviewed two different approaches to making this level of changes:

1. A proposal for a complete change all at once.
2. A gradual change over the course of multiple years.

## A Proposal for Significant Changes Will Likely Not Succeed

The Washington Department of Fish and Wildlife (WDFW) presented a request to its legislature to modernize its scientific data management capabilities in 2025. The WDFW put forward a broad plan to boost conservation efforts for the state's fish, wildlife, and natural areas. The proposal includes using cloud storage, building a modern data library, and creating a shared space for data analysis. It also planned to explore advanced data management tools and bring on an AI Specialist to help guide policies and partnerships for secure AI integration. This plan would take two years, cost \$6.9 million, and increase the WDFW staff by five positions budgeted, also known as PBs.

The proposal was well-designed and thoughtfully prepared. However, it did not receive the funding to make such large changes at once. In FWP's current situation, with numerous ongoing changes and modernization efforts, an approach like this would likely be overwhelming.

### **Data library:**

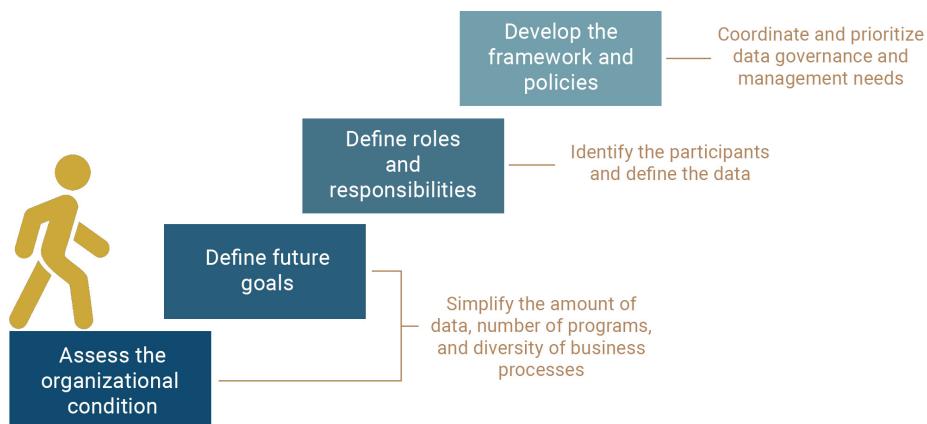
Centralized collection of data, helping organizations to track, locate and utilize data.

## Measured, Incremental Change Is More Likely To Succeed

We discussed data governance implementation with Montana's Department of Public Health and Human Services (DPHHS). We also considered a general approach to this situation from the perspective of the State Chief Data Office (State CDO). The DPHHS is using a multi-step approach for foundational data governance implementation. It began its journey in 2023, when it determined it wanted to start performing research and analytics in a more scientific and prescribed way. Over the past two years, it has assessed its current organizational state, defined its future goals, and defined data management roles and responsibilities. The DPHHS is now developing a framework and policies for data management. While this has taken 18-24 months, the agency is building on its progress and working to effect permanent change. This measured approach helps to bring agency personnel on board with the initiative at a pace they can manage.

This incremental approach has also resulted in a very low cost to the DPHHS. It was already using and paying for certain services with a nominal cost at the enterprise level. It could, therefore, leverage these services without incurring additional cost. This approach, as shown in Figure 7 (page 13), will address the challenges agency staff indicated to us and be more effective for FWP.

Figure 7  
**How Data Governance Can Help Overcome FWP's Challenges**



Source: Compiled by the Legislative Audit Division.

## **Resources Exist To Help FWP Throughout This Change**

Montana Fish, Wildlife & Parks does not need to start from scratch on its data governance goals. The Washington Department of Fish and Wildlife, which shares many of the same responsibilities, has already done much of the groundwork. FWP can adapt key parts of Washington's proposed plan to fit its own needs. By combining that with the data governance experience of the DPHHS, FWP will have a strong, well-rounded roadmap for putting foundational data governance into action.

The DPHHS is also working closely with the State CDO during its journey. The State CDO offers resources for data literacy, data governance, and tools for data management. It seeks to work with state agencies to address data needs across the enterprise. With these resources and a more measured approach to implementing data governance, FWP will improve its ability to use data to derive insights, make informed decisions, drive business processes, and achieve organizational goals.

### **RECOMMENDATION #1**

*We recommend that Montana Fish, Wildlife & Parks, working with the State Chief Data Office, build data governance and understanding of data as an asset to:*

- A. Develop an agency-level data management strategy, and*
- B. Define and assign the roles and responsibilities for data management.*

## Once Data Governance Exists, FWP Can Address Operational Data Management

Governance is agency leadership setting the direction for what needs to be done, and management ensures that operations follow that direction. At FWP, leadership plays a key role in supporting effective data management across the agency. By setting expectations and modeling best practices, leaders help establish a consistent approach to handling data.

This begins with a shared language and extends to other foundational practices, including:

**Language:** A business glossary plays a key role in getting everyone on the same page with the terms they use by standardizing definitions for both terms and concepts. It ensures that people understand and use words consistently, preventing any confusion. This shared language fosters clarity and collaboration.

**Data knowledge:** Shared knowledge helps as well. In an organization, individuals possess varying levels of data knowledge. However, no individual will know everything about the data. Metadata is the main tool used for capturing and managing that knowledge. Metadata shows an organization:

- What data it has,
- What the data represents,
- From where the data originates,
- How the data moves through systems,
- Who has access to the data, and
- What it means for the data to be of high quality.

Centralized metadata management streamlines data processes by ensuring that information is well-organized and secure.

**Data quality:** While metadata is crucial for organizing data, ensuring data quality, or how fit data is for its purpose, is just as vital for informed decision-making. Centralizing metadata creates a strong base for a unified data quality strategy, which upholds accuracy, consistency, and reliability across datasets. This centralized approach is key to maintaining high data standards.

### **Data Governance is Necessary for Alignment**

A clear and consistent approach to data governance helps everyone in the organization stay aligned. By using a shared business glossary, managing metadata effectively, and following a unified data quality strategy, teams can better understand, trust, and use data throughout its entire lifecycle.

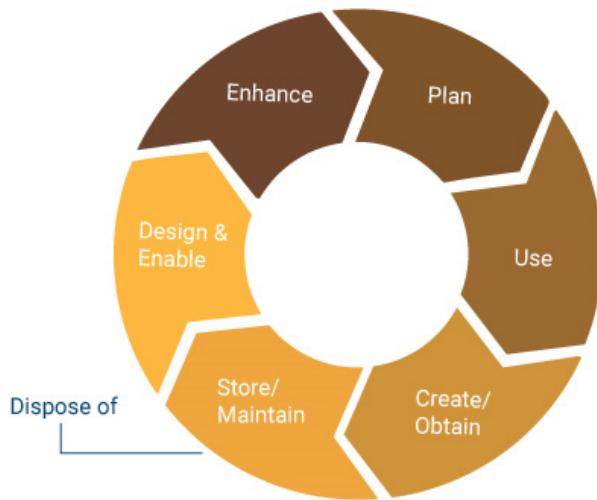


**Data asset lifecycle:** To get the most value from its data, an organization must manage the full lifecycle of its data assets. This lifecycle is shown in Figure 8.

A strong data quality strategy supports this by guiding data from creation to disposal. Effective lifecycle management keeps data useful and relevant, helping achieve strategic goals and make better decisions.

Governance provides agency-wide direction for operational processes, enabling staff to align their approaches to data management. Without it, individual business units can create their own methods and approaches that may not translate across teams. These fragmented practices reinforce data and operational silos, ultimately hindering collaboration.

Figure 8  
The Lifecycle of Data Assets



Source: Compiled by the Legislative Audit Division.

## **Montana Fish, Wildlife & Parks Has Components of Data Management, but Struggles To Mature Them Across the Agency**

As noted, Montana Fish, Wildlife & Parks lacks the operational building blocks essential for effective data management. Instead of setting agency-wide expectations and processes, interviews with staff showed that FWP leaves it to individual divisions to define and manage their own approaches.

### **The Basis for a Business Glossary Exists, but It Falls Short of Expectations**

Montana Fish, Wildlife & Parks currently has agency-wide direction for branding (FWP Style Guide) as well as statute (MCA, Title 87) to standardize business terms and their meanings. While a style guide establishes and enforces consistency in written and visual communication, ensuring a unified brand identity and improving clarity, it is not a suitable substitute for a business glossary. Additionally, the FWP Style Guide does not include all terms that are relevant in the agency. These terms are scattered throughout MCA, Title 87, making them hard to find. Therefore, the FWP Style Guide does not meet the intention of nor can it be used as a business glossary. However, it can serve as a starting point to develop a business glossary, since the purpose of a business glossary is to provide standardization and consistency.

### **Metadata Can Enhance Data Sharing**

Unlike the FWP Style Guide and MCA, which are applied throughout the agency, FWP does not have a shared metadata repository, or other means of storing data model details, definitions, and imported metadata. Rather, individual divisions and business units manage metadata in their own way. This results in some divisions and units managing metadata effectively.

In contrast, others do not fully understand what metadata is, its potential benefits, or how to utilize it, contributing to a lack of data sharing. Program staff assume that sharing data would allow access to all data, leading to a territorial mindset within divisions. Tagging the data with appropriate metadata can inform access requirements and ensure only those who need to know and use the information can access it.

## **Data Quality Must Be Managed After Point of Entry**

Without centralized metadata management, FWP lacks the foundation on which to establish a comprehensive data quality strategy. Individual product owners are expected to participate in the initial phase of system building or updating to help set the requirements for data format and limits. The agency manages data quality more consistently at the point of data entry, but does not have an underlying plan for describing what data quality means or how it should be managed across FWP. It is left up to the individual product owners to define what data quality means to them, as well as to enforce that definition of data quality.

## **Montana Fish, Wildlife & Parks Sees Data as a Static Record and Not a Dynamic Asset**

Agency personnel often conflate the lifecycle of data assets with that of individual records. While the agency maintains a strong records management plan, data assets demand distinct oversight—oversight that tracks where data is created and whether it has been modified, moved, or deleted. Maintaining data quality is critical at every stage of this lifecycle, not just at the point of creation.

The expectation that program managers and product owners will naturally take on data governance responsibilities reveals a deeper organizational issue. This widespread confusion stems from asking them to serve as de facto data managers. These individuals are IT professionals who handle the technical aspects of data management. They manage data files, ensuring access to relevant data, maintain databases, streamline processes, review data accuracy, recommend upgrades, and communicate changes to managers and staff.

Instead, program managers and product owners should serve as business data stewards. These individuals are business professionals rather than IT professionals. They are subject matter experts who understand the requirements of specific datasets, ensuring the data is suitable for a particular business purpose. They do not need deep governance expertise, but should follow established frameworks that manage data effectively. Expecting program staff to serve as data managers instead of business data stewards is a consequence of decentralized structures, licensing pressures, and entrenched organizational silos.

### **Data manager:**

Individual who designs, runs, and/or oversees data systems for an organization.

### **Business data steward:**

Business professional accountable for specific data who works with stakeholders to define and control that data.

## **Building Operational Components Through Modernization Projects**

Montana Fish, Wildlife & Parks relies on legacy systems for its daily operations. Many of these systems are overdue for updates, forcing the agency to juggle day-to-day functionality with the need for improved capabilities. Because these systems manage critical data, the delay in updates has also stalled data lifecycle management. While FWP has started modernizing its infrastructure, rolling out all components at once would be overwhelming and ineffective.

As the agency develops its governance model, which informs and guides the operational aspects of data management, it can create “proof of concept” models to understand the involved processes. These models can aid the agency in shaping its governance development efforts. Once governance is established, the agency can align these initial operational models with its strategy, enabling them to expand and support additional agency operations. The pieces build on each other, starting with the business glossary, and progressing through metadata management and a data quality approach, to managing the lifecycle of data assets.

The agency is taking a phased approach to replacing ALS. These project phases are business needs to which data management assistance can be tied. The agency can reach out to the State Chief Data Office for guidance on developing a business glossary, centralizing its metadata management, establishing a data quality approach, and managing the lifecycle of its data assets. As the agency takes on more modernization projects, it can improve data management in other areas of the agency.

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### **RECOMMENDATION #2**

*We recommend that Montana Fish, Wildlife & Parks work with the State Chief Data Office to establish data management operations incrementally to:*

- A. *Develop a business glossary,*
- B. *Centralize metadata, so that it can be managed at an agency level,*
- C. *Develop an agency-wide data quality approach, and*
- D. *Establish processes to manage the data asset lifecycle.*

---

## **Decentralization Affects Other Areas of IT Management and Impacts Overall Effectiveness**

Montana Fish, Wildlife & Parks has an opportunity to improve data management by building foundational operational elements in step with its modernization efforts. While it does not yet have agency-wide governance, it can start by developing practical tools, such as a business glossary, centralized metadata, and a consistent approach to data quality, that support its phased system upgrades. Viewing data as a dynamic asset and clarifying the role of business data stewards will help break down silos and reduce confusion. With guidance from the State Chief Data Office and steady, incremental progress, FWP can establish a strong foundation for agency-wide data governance.

As these improvements take shape, they naturally connect with broader organizational needs, including the integration of internal controls. Just as effective data governance depends on defined roles and collaboration, aligning IT capabilities with business goals requires similar coordination. By applying the same phased approach used in its data projects, FWP can ensure this alignment supports not only operational efficiency, but long-term success across the agency.

## Chapter III - Improving Collaboration and Internal Control

### Introduction

Montana Fish, Wildlife & Parks is organizationally and operationally complex, and its business processes rely on legacy systems. These factors make communication, collaboration, and maintaining consistent processes and controls a challenge. These challenges are compounded by the same problems as seen in our review of data management:

- Decentralization and organizational silos,
- Technical debt, and
- Focus on ALS.

Managing internal control in a large, complex agency requires close collaboration between program staff and IT operations. Program staff define strategic goals and IT delivers the tools to achieve them. Without one, the other cannot function effectively. Together, they can fulfill the agency's mission.

To support this partnership, the agency must align its business and IT priorities, maintain formal communication, and manage the IT environment and controls consistently. Alignment builds trust and ensures work is prioritized appropriately. Clear communication keeps stakeholders informed, while consistent IT management helps technical solutions meet real-world needs. These practices are especially critical as the agency confronts legacy systems, modernization efforts, and ongoing organizational change.

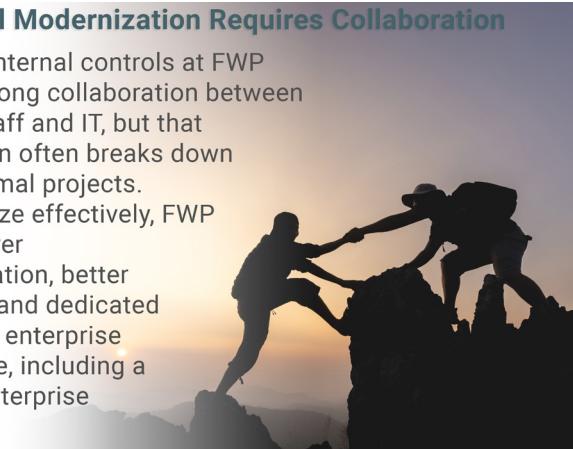
Our review found that the agency does not consistently follow best practices to foster business-IT alignment or to effectively monitor IT controls. While coordination improves on projects, it remains weak in day-to-day operations. Similarly, the effectiveness of internal controls varies. Some systems are well organized, while others are incomplete or lack structure.

### Montana Fish, Wildlife & Parks Has a Dual Business-IT Relationship Nature

The agency has established best practices to foster the business IT relationship for formal projects. However, it has not created the same practices for the nonproject work of maintenance and support. The Project Bureau leads on formal projects and has developed extensive documentation to plan and manage application and system development.

#### **Successful Modernization Requires Collaboration**

Managing internal controls at FWP requires strong collaboration between program staff and IT, but that coordination often breaks down outside formal projects. To modernize effectively, FWP needs clearer communication, better alignment, and dedicated support for enterprise architecture, including a full-time Enterprise Architect.



For example, the Project Bureau's leadership and documentation ensure that IT:

- Understands business expectations,
- Manages the business relationship, and
- Coordinates and communicates between business and IT.

The Project Bureau identifies stakeholders and documents business needs, and the new CTO uses the Agile approach in project execution to ensure collaboration between business and IT.

#### Agile approach:

Project management method emphasizing flexibility, collaboration, and iterative development cycles.

However, in the nonproject work of maintenance and support, the business-IT relationship is not formalized like it is for projects.

### IT Struggles To Position Itself To Be a Partner to Business Outside of Projects

The absence of formal structure for maintenance and support creates struggles in multiple areas:

- The agency has not established designated communication channels with the bureaus in TSD to efficiently resolve user issues. As a result, division administrators seek help directly from the CIO when they have questions or encounter issues. Intervening for the division administrators reduces the CIO's available time. This reduction limits the CIO's ability to focus on higher-level considerations. These considerations include IT strategy development and implementation, as well as governance.
- The agency lacks communication channels beyond the CIO sharing information with division administrators. As a result, this information does not always reach staff, who are unaware of IT priorities. Lacking an awareness of IT priorities, agency staff experience frustration with IT when project staff decline nonprioritized projects.
- Because IT does not document nonproject business expectations, it cannot identify opportunities for information and technology to enhance the business. While the Project Bureau has dedicated business analysts (BAs) to act as relationship managers for FWP's systems, these staff are kept busy ensuring the continuing functionality of legacy systems. BAs evaluate business needs and recommend solutions that deliver value. At FWP, BAs are only responsible for facilitating small projects or phases of larger projects within the agency. They are not responsible, nor do they have the capacity, for seeking solutions for strategic goals.

The Technology Services Division noted that it works to build relationships across the agency, beginning with New Employee Orientation and continuing through ongoing conversations and active listening. Still, these efforts are not enough to create a strong, lasting partnership, since the division's time and resources are focused on the ALS. Staff responsible for other systems are often left to manage them on their own, regardless of their experience or technical skills. As a result, program staff tend to come to the technology team with proposed fixes instead of describing the actual problems. This limits the team's ability to offer better or more strategic solutions. When program staff take full ownership of technology decisions, it also makes it harder for the division to maintain a clear, agency-wide view of technology needs and priorities.

## **Business Ownership of IT Includes Internal Control Management**

Due to the importance of ALS to the agency, IT prioritizes its monitoring and management of internal controls on that system such as access control and system monitoring. These actions provide advantages to both the agency and ALS. However, they consume a significant portion of TSD's time due to ALS's age and complexity so TSD staff are not able to offer the same support to other systems.

The expectation placed on program staff to manage internal controls within the agency's systems places extra stress on product owners. These business professionals do not necessarily have the required skills, expertise, or time to manage and support technology solutions. We observed that product owners have varying levels of skill in managing internal technical controls. We also saw that the agency relies on manual operations and controls, such as manual data transfers, instead of automating these processes. This approach often involves employing workarounds rather than utilizing business processes embedded in system functionality. As a result, the reliance on manual operations and workarounds has led to increased control weaknesses that are not identified promptly, resulting in a lack of visibility and further exacerbating the control issues within the agency.

## **Frustration Exists Between IT and Programs, and Consistency Is Critical To Address Issues**

The inconsistent approach to business-IT relationships, along with fragmented system ownership and a predominantly reactive IT response, has caused frustration throughout the agency. Agency personnel are dissatisfied with the number of legacy systems still in use. These outdated platforms are unable to incorporate business processes, forcing users to rely on inefficient workarounds. IT shares in the frustration since its role is largely limited to responding to service requests and incidents.

Consistency in the business-IT relationship is essential. It shows both sides are valued and respected by each other. It also shows that IT is aware of the contributions that other systems make to the Automated Licensing System. While program staff we interviewed agree with its importance, those managing systems outside ALS felt their contributions were often overlooked. These systems feed data into ALS, whether through an automated process or a manual one. Some of these sources are at risk of being permanently lost, which could affect the agency's ability to accurately regulate certain licenses. Program staff also noted that incorrect data transfers could prevent licensing restrictions from being properly updated.

## **To Address Inconsistencies, FWP Needs To Establish Collaborative Guidance and Communication**

Best practices, including those found in COBIT and the BABOK v3, state that the implementation of an IT steering committee establishes guidance and coordination. In turn, guidance and coordination enhance alignment between technology initiatives and the agency's broader business goals. An IT steering committee brings together diverse expertise to ensure IT decisions are not made in isolation. This allows representatives from various divisions and management levels to collaborate, ensuring IT initiatives align with the agency's vision.

The concept of a steering committee is something FWP has tried to implement in the past. However, leadership and staffing turnover have stifled progress. During our work, there was no consistent entity guiding IT direction within the agency. Without a dedicated champion or entity to fulfill this role, IT management and strategic alignment become inconsistent.

Communication aids the guidance provided by an IT steering committee. Montana Fish, Wildlife & Parks has the tools to document decisions and priorities, but relies on email and informal channels to pass on that information. Agency staff would benefit from a more formal way of communicating that information across the agency, especially in a decentralized and geographically dispersed agency. Clear and open communication plays a crucial role in driving collaboration, aligning IT with business objectives, and building strong relationships with customers and stakeholders. Additionally, adequate communication channels enable the timely dissemination of updates, notifications, and feedback, keeping all parties informed and engaged.

Establishing a fully functional IT steering committee, supported by consistent leadership and structured communication channels, will strengthen alignment between IT efforts and agency goals, ensuring consistent direction and collaboration across FWP.

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#### **RECOMMENDATION #3**

*We recommend that Montana Fish, Wildlife & Parks:*

- A. *Establish an IT steering committee with a formal charter, clearly stating the roles and responsibilities of the committee and its members, and executive-level support, and*
- B. *Establish an internal IT communication tool to disseminate IT's priorities, projects, and processes.*

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## **Technical Debt Impedes FWP's Ability To Grow and Modernize**

The delegation of IT responsibilities to program staff has created a scattered, inconsistent IT environment. Without IT support, these applications may become outdated or overlap in functionality, creating various risks that the agency will have to address:

- The ability to integrate or implement newer technologies prolongs and hinders modernization efforts.
- Unsupported, aging applications can introduce security vulnerabilities that could go unnoticed within FWP's environment.
- Without active management of IT assets, the agency cannot identify applications that are no longer in use. These unused applications occupy space within the IT landscape and can unnecessarily consume FWP's budget, which becomes technical debt.

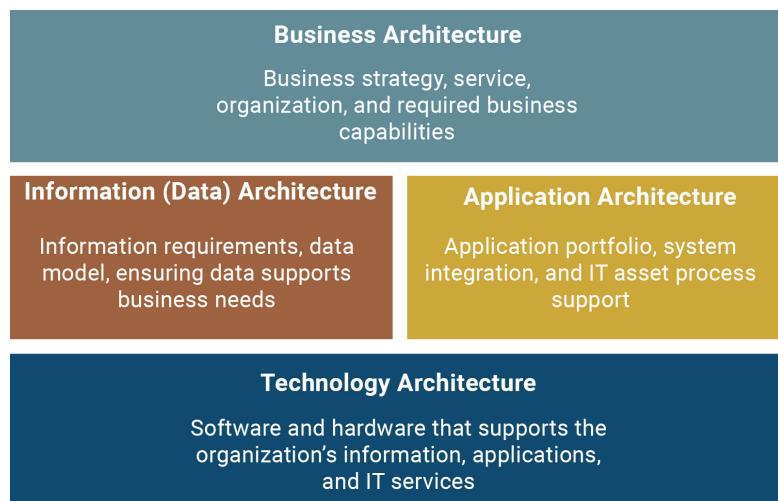
As the environment grows more complex, the need for tailored solutions has increased. We saw a significant theme of extensive customization in FWP's IT environment. The emphasis on customization has led staff to favor in-house development over the acquisition of commercially ready-made software that can be configured to address FWP's needs. This has shaped the approach to replacing the aging ALS. During the vendor search, FWP found that no provider could fully meet its specialized needs, so the agency chose to develop the new system internally.

The agency's reliance on customization presents challenges since it perpetuates a cycle of dependency on customization for operational continuity. When key staff leave, they often take with them essential knowledge of custom-built systems. Currently, FWP faces this issue because the agency lacks detailed system-level documentation. Staff turnover increases the risk of knowledge gaps, making system maintenance even more difficult without better documentation.

## Enterprise Architecture Concepts Can Address FWP's Tech Debt

Enterprise architecture (EA) is a framework that outlines the structure and operations of organizations. It aims to determine how an organization can effectively achieve its current and future objectives. EA focuses on integrating legacy applications and processes to form a seamless environment. Additionally, it provides organizations with a means to adapt to rapid technological growth. This is done through various layers that work together, shown in Figure 9.

Figure 9  
The Layers of Enterprise Architecture



Source: Compiled by the Legislative Audit Division.

Agency leadership believes the agency can use enterprise architecture concepts to maintain alignment between its IT environment and its evolving goals and objectives. It anticipates that these concepts will facilitate agility, ensure alignment, foster collaboration, and improve transparency and accountability. Leadership also believes that EA sets the stage for FWP's long-term success by supporting leadership transitions, promoting consistency and efficiency, and facilitating strategic innovation.

## Application Portfolio Management Aligns FWP's Software Solutions With Its Business Objectives

Application portfolio management, or APM, aligns Montana Fish, Wildlife & Parks' software solutions with its broader business goals. As a core element of enterprise architecture, APM goes beyond a simple inventory of applications. It evaluates how each software solution fits into the organization's strategic framework, aiming to optimize IT assets and maximize the value of existing investments.

Incorporating portfolio management into FWP's enterprise architecture can help reduce technical debt, modernize supporting systems, and break down organizational silos.

Unlike the more immediate focus of a product owner, APM provides a strategic, enterprise-wide perspective. This approach can reduce the agency's dependence on custom-built tools by identifying shared needs across departments and promoting solutions that address the majority of use cases. Portfolio management can also help establish a licensing-based framework that defines how applications integrate into the agency's broader digital infrastructure.

## Enterprise Architecture Can Provide Operational and Financial Benefits

Enterprise architecture helps IT and operations teams quickly improve their technology systems and address gaps without long delays in implementing solutions. This translates into operational and financial benefits for organizations that implement it.

**Operational:** Enterprise architecture practices, including APM, can enhance the agency's management of its internal controls by addressing existing deficiencies. It will enable the agency to better identify overlapping internal control technologies, such as the use of three different solutions that can perform monitoring. Furthermore, it will motivate IT to leverage automation features to streamline processes rather than manually testing controls. By doing this, IT will gain additional capacity to offer guidance and support to all program staff in managing internal controls.

**Financial:** Estimating the exact cost savings from improved process efficiency and reduced operating expenses can be challenging. However, industry research offers some guidance. Gartner indicates that companies with a solid enterprise architecture foundation typically have 25 percent lower IT costs. By applying this percentage to FWP, we can estimate potential savings from enhancing its EA. With the agency's TSD base expenditures for the FY2026–FY2027 biennium at \$20,578,814, a 25 percent reduction could lead to biennial savings of over \$5 million.

### Application Portfolio Management (APM):

Strategically managing applications to ensure alignment with business objectives.

## **FWP Currently Lacks the Capacity To Implement Enterprise Architecture Concepts**

Montana Fish, Wildlife & Parks' IT environment is complex and highly customized, demanding a robust enterprise architecture framework that includes application portfolio management. Developing this framework requires focused effort to achieve outcomes comparable to those realized by the Project Bureau through its application of project management principles. This level of commitment necessitates the full-time attention of a dedicated Enterprise Architect.

Currently, the agency assigns the Enterprise Architect role to the Project Bureau Chief. This dual responsibility may be practical if FWP operates primarily on modern COTS solutions. However, given the agency's reliance on heavily tailored systems, this arrangement is not ideal. Based on this assignment, the agency is currently spending approximately \$33,000 annually on an Enterprise Architect who also functions as Senior Project Manager and Projects Bureau Chief for TSD. If FWP were to assign this role so that its function was fully performed by either multiple people or a single individual, the cost would be approximately \$145,000 annually. Investing in a dedicated Enterprise Architect role is a reasonable choice, especially when considering that implementing enterprise architecture may result in annual savings of \$2.5 million.

To manage its complex IT environment effectively, Montana Fish, Wildlife & Parks needs to prioritize enterprise architecture with dedicated leadership. Whether through a new role or a structured team, a consistent focus on EA is essential to support modernization, reduce technical debt, and align technology with agency goals.

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### **RECOMMENDATION #4**

*We recommend that Montana Fish, Wildlife & Parks incorporate enterprise architecture concepts, including application portfolio management, to identify and then reduce the agency's technical debt, and to consistently manage its internal controls.*

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## **Consolidation May Affect the Time Necessary for FWP To Implement Change**

This audit engagement has concentrated on FWP's IT management of data, relationships, and controls. The Executive Order will influence how the agency implements recommendations. We do not anticipate that it will change the findings or recommendations of the report, as IT management involves a partnership between business (agency leadership) and IT. Both parties have responsibilities and can take actions to enhance the agency's condition.

The business side remains constant, despite experiencing its own series of recent upheavals. While the agency can work to address this side of change, the restructuring of IT may require more time to clearly identify the expectations and means through which SITSD and FWP will build a new business-IT relationship.



DEPARTMENT OF FISH,  
WILDLIFE & PARKS

DEPARTMENT RESPONSE





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RECEIVED  
 November 3, 2025  
 LEGISLATIVE AUDIT DIV.

Dear Mr. MacIver:

Please see below for the Department's Response regarding the Information Technology Audit:

**Recommendation 1:**

*Governance, Risk Assessment, and Planning*

Montana Fish, Wildlife & Parks needs to collaborate with the State Chief Data Office to create a data governance framework, treating data as a valuable asset. This partnership should aim to develop a data management strategy and clarify roles and responsibilities.

**Department Response: Concur**

The agency concurs with this audit finding and recommendation. The department has already begun coordinating with the State Chief Data Office to initiate planning for a formalized data governance framework. Initial meetings have taken place to identify key objectives and outline a phased approach for developing an agency-wide data management strategy and clarifying roles and responsibilities. As part of these efforts, the position description for FWP's Technology Program Coordinator has been updated to include responsibilities for data management, ensuring dedicated leadership and accountability for these initiatives. The department recognizes that measured, incremental change in collaboration with enterprise partners is the most effective way to establish lasting data governance practices.

**Recommendation #2:**

*System and Information Management*

Montana Fish, Wildlife & Parks needs to work with the State Chief Data Office to progressively establish data management operations. This includes creating a business glossary, centralizing metadata, developing a data quality approach, and managing the data asset lifecycle.

**Department Response: Concur**

The agency concurs with this recommendation and notes that establishing data management operations will be included in the department's phased approach to implementing improved data governance. This will involve working with the State Chief Data Office to create vital components such as a comprehensive business glossary, centralized metadata management, robust data quality strategies, and enhanced asset lifecycle management. The department

recognizes that successful data operations depend on incremental, collaborative efforts, and will integrate these objectives into the broader planning and action steps already underway in coordination with enterprise partners. As described in our response to Recommendation 1, these actions form an essential part of the agency's commitment to continuous improvement in data and information management.

**Recommendation #3:**

*Governance, Risk Assessment, and Planning*

Montana Fish, Wildlife & Parks needs to form an IT Steering Committee with a formal charter, defined roles, and executive support. Additionally, it should implement an internal IT communication tool to share priorities, projects, and processes.

**Department Response: Concur**

The department concurs with this recommendation. Since the audit work began, FWP has developed a governance framework that aligns with the current Director's vision and strengthens accountability across business operations. This framework is intended to support transparent decision-making and ensure that information technology priorities align with the agency's mission.

With the recent centralization of FWP information technology staff into the Department of Administration (DOA), the department recognizes that implementation processes will evolve under the state's new shared-services structure. FWP will continue to identify and communicate its internal priorities and business-driven needs to DOA but acknowledges that specific execution processes will depend on future workflows and resource allocations defined by DOA.

The agency remains committed to maintaining collaboration with DOA to ensure that governance principles and communication pathways foster consistent prioritization, effective oversight, and service delivery aligned with both FWP's operational goals and the Governor's centralized IT direction.

**Recommendation #4:**

*Governance, Risk Assessment, and Planning*

Montana Fish, Wildlife & Parks needs to integrate Enterprise Architecture concepts, including application portfolio management, to identify and reduce technical debt and consistently manage internal controls.

**Department Response: Concur**

The department concurs with this recommendation. FWP is in the process of transitioning from an internally developed application portfolio management system to full adoption of the statewide enterprise solution. This transition will allow FWP to better align with statewide architecture and modernization objectives, supporting more consistent tracking, prioritization, and planning for agency technology needs.

As part of this transition, long-term technical debt reduction and modernization activities will be coordinated and managed through the DOA under the integrated IT services model. FWP will continue to communicate its business needs and portfolio priorities to DOA to ensure alignment with the agency's mission and strategic direction.

Thank you for your and your staff's time and dedication to this work.

Sincerely,



Christy Clark

Christy Clark, Director