



THE STATE OF ARIZONA
GAME AND FISH DEPARTMENT

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December 16, 2013

Ms. Debbie Davenport, CPA
Auditor General
Office of the Auditor General
2910 N 44th Street, Suite 410
Phoenix, Arizona 85018

Dear Ms. Davenport:

On behalf of the Department and Commission, we want to extend our gratitude to you and your professional staff for this performance audit of the Arizona Game and Fish Department and Commission. As an agency committed to serving the public with excellence, we view audit as a valuable tool for the evaluation of processes and process improvement. It has been a pleasure to work with you and your staff over the past twelve months as this audit was conducted. The Department appreciates your staff's dedication to conducting a fair and very thorough review, including the time and effort involved in developing constructive recommendations, and the open attentive manner that characterized the interactions between our respective staff members.

We are proud of the Department's performance which was carefully reviewed across a broad range of our responsibilities and systems during this audit. The Department appreciates that the audit report identifies some opportunities for improvement. In the attached response, the Department provides comments to each of the four findings identified in the report, followed by specific responses to each recommendation.

We look forward to working with you and your staff over the coming months as we implement enhancements to our processes, policies, and procedures. The Department's vision is to be the national conservation leader supporting the continuation of the North American Model of Wildlife Conservation and Arizona's most trusted, respected and credible source for wildlife conservation products, services and information. Enhancements recommended by this audit will help us continue our pursuit of that vision in the service to the people of the state of Arizona.

Sincerely,

Larry D. Voyles
Director

John W. Harris
Chairman, Arizona Game and Fish Commission

Below is the Department's response to audit report's findings and recommendations.

Finding 1: Commission and Department should ensure prudent stewardship of public resources: Overall, the Department agrees with the elements of Finding 1.

The audit report references two employee-related incidents, one in 2003, and the other in 2013, which resulted in the loss of approximately \$19,000 before court-ordered restitution. The Department agrees that these were serious issues. In both incidents, when the Department detected wrong-doing, it took prompt action to resolve the issue, including discipline, separation from employment, and criminal investigations. The Department concurs that enhancing policies and procedures will better ensure that similar incidents do not occur in the future. The Department has already improved processes and procedures including requiring segregation of duties, strengthening controls, and is further enhancing its policies and procedures. Additionally, as mentioned in the audit report, the Department is taking actions to further identify potential improvements through an internal audit.

With regard to travel, the Department's internal travel policy and procedures for in-state and out-of-state travel comply with the State of Arizona's travel policy and provide a significant level of accountability. The Department agrees that enhanced procedures regarding consideration for travel could be beneficial. Currently, all out-of-state travel requires that travel authorization documents are reviewed and approved in writing by immediate supervisors, project leaders, Assistant Directors, and the Director/Deputy Director. For travel involving more than two employees, the Department's executive leadership identifies the staff with the appropriate subject matter expertise and directs them to attend.

As noted in the audit report, the Department's in- and out-of-state travel costs represent approximately 1 percent of its total expenditures, a majority of which (65%) is for in-state travel. The nature of the Commission's and Department's mission requires travel to all corners of Arizona to manage more than 800 species of wildlife, to provide for safe and compatible recreation, and to enforce the laws that govern wildlife, watercraft, and off highway vehicles. In addition, in-state travel, such as holding Commission, stakeholder, and other meetings on various topics throughout the state, is critical to building relationships and promoting public engagement. The ability for the public to meet with their Commission in person is paramount to maintaining public trust.

To implement and safeguard Arizona's authorities, rights and interests in response to federal overreach, the Director, Department staff and Commission must travel to engage in regional and national policy forums, including conferences, meetings, and other events. The audit report mentions the Director's travel status in 2011 through 2013. The Director, who also serves as Secretary to the Commission, is the Department's most effective and appropriate representative, particularly when negotiating with the highest levels of the Federal conservation agencies, and frequently travels without staff support to reduce costs to the agency.

Out-of-state travel represents approximately 0.36% of the Department's overall expenditures. Such travel allows the Department to work with other states and federal agencies to ensure that Arizona's interests are defended and well represented. Effective wildlife management and

administration reflective of Arizona's needs requires advocacy and policy engagement at regional, national, and international levels. The ability to meet face to face with national level decision makers whose actions can affect Arizona is essential to maintaining the State's jurisdictional authorities related to the Department's mission.

There are few champions for the state conservation machine (the collective conservation system delivered by the 50 state fish and wildlife agencies) active at the nation's capital. The state of Arizona is one of those champions. Nationally, the combined annual states' contribution to wildlife conservation is approximately \$4.3 billion, 8,000 wildlife officers, and 184 million acres, compared to the United States Fish and Wildlife Service's (FWS) contribution of approximately \$1.7 billion, 628 wildlife officers, and 150 million acres. In the face of federal encroachment on conservation of state resources, it has become abundantly clear that Arizona's leadership role is critical to the future of the state conservation machine.

Department travel provides a multitude of benefits to Arizona. For instance, contacts made at the annual Shooting, Hunting and Outdoor Trade (SHOT) Show™ and related events have already resulted in approximately \$750,000 in grants and donations that support the Department's Scholastic Clay Target Program, benefitting youth throughout Arizona. Another example is the Director's participation at the Wildlife and Hunting Heritage Conservation Council (a federal advisory committee to the Secretaries of Interior and Agriculture) which helped maintain access to approximately 500,000 acres for recreational shooting on federal public lands close to Phoenix.

Department travel to conferences, such as the Western Association of Fish and Wildlife Agencies (WAFWA) is directed by the Commission and executive leadership to assure Arizona subject matter expert engagement on policy issues at regional, national, and international levels, which the Commission has determined is in the best interest of the state. The audit report highlights the Department's participation at WAFWA conferences from July 2011 through January 2013, emphasizing the Department's attendance at the 2012 annual conference.

WAFWA conferences are hosted by member states or provinces on a rotational schedule. For example, the 2011 conference was hosted by member state Montana, the 2012 conference was hosted by member state Hawaii, and the 2013 conference was hosted by member state Nebraska. WAFWA requires all standing committees and most working groups to meet during each annual conference. In 2012, Department personnel participated in 21 different WAFWA Committee or Working Group meetings, chairing eight of them. Committee meetings are held concurrently over a compressed schedule, requiring a number of Department subject matter experts to attend. The Department has consistently engaged at a high level of participation at WAFWA and agrees that it sends more participants than some other member agencies. For decades, this level of participation has allowed the Department to exert significant influence on a variety of regional and national issues. Some examples of successful outcomes from the 2012 Hawaii WAFWA conference include:

- WAFWA Directors, including the Department's Director, adopted a Resolution requesting the de-listing of the gray wolf as a federally endangered species. The request

was subsequently endorsed by members of Congress, including members of the Arizona Delegation.

- The Department and other WAFWA member states laid the framework for interventions at the Convention on International Trade in Endangered Species (CITES) and also met with the FWS to challenge the scientific foundations of ‘precautionary’ endangered species listings based upon projected impacts of climate change. At the 2013 meeting of CITES, a proposal surfaced to uplist the polar bear largely due to unsubstantiated claims regarding sustainability and climate change. Allowing the use of unsubstantiated claims could have added weight to arguments for federal listings of Arizona species that might not be warranted. The Department’s representative prepared the WAFWA position and argued against the use of factors for listing that lack sound scientific support. This compelling argument ultimately swayed the vote of more than 20 nations at the CITES conference and the proposal was defeated.
- The Department continued coordination work on assembly of state wildlife Crucial Habitat Assessment Tools (CHATS) with the Western Governors Association. These interlinked geospatial tools allow the states to help guide and facilitate energy development and transmission siting.
- The Department, other WAFWA Directors, legal counsel, and subject matter experts also laid the framework for intervention and amici filings in defense of the New Mexico Game and Fish Department against assertions that by allowing trapping, the state was violating the ‘take’ provisions of the Endangered Species Act with regard to the 10j population of Mexican wolf. Arizona was an intervener in the case and its brief informed the strategy for defense of the states’ interests.
- The Department, working with other Western States, was able to secure approximately \$1 million in additional resources for Lake Mead, including funding for the National Park Service (NPS) and the state of Nevada, to help contain and abate quagga mussels, an aquatic invasive species.
- The Department coordinated WAFWA’s Grasslands Initiative, which laid the framework for multi-state range-wide conservation agreements that could preclude the need to list new endangered species. This is the first time a consortium of states has banded together under the aegis of WAFWA to administer an agreement of this type. These agreements will generate millions of dollars for conservation.
- The Department, with WAFWA member states, was able to coordinate directly with U.S. Bureau of Land Management on proposed changes to its wildlife translocation policies and handbook guidance, a matter of intense interest to Arizona.
- The Department, working with the Western Region of NPS, initiated development of a Master Memorandum of Understanding for inter-agency coordination. This is a ‘first-of-its-kind’ among western state wildlife agencies.
- Through WAFWA’s Hunter, Angler, Shooter Sports and Wildlife Recreation Participation Committee, the Department continued to work with other states and non-government partners to build and evaluate programs and marketing strategies to recruit and retain new customers. This approach allows member states to learn from and build upon each other’s successes and establish best practices for ensuring a future customer base that supports the North American Model of Wildlife Conservation.

Recommendations:

Recommendation 1.1: *The Department should immediately finalize and implement changes to its policies and procedures for its Special Operations Unit.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.2: *The Department should enhance its travel procedures by establishing additional guidelines for managerial decision making about travel, such as how to determine which conferences, trainings, or other travel are deemed essential to the Department, how many Department representatives should attend, and whether using state vehicles or reimbursing employees for miles driven is more cost effective.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.3: *The Department should work with the Commission to regularly consider ways to help limit travel costs associated with its Commission meetings.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.4: *The Department should enhance and implement its July 2013 wireless devices policy. Specifically the Department should:*

1.4a: *Ensure that all employees who are provided wireless devices sign user agreements as its July 2013 policy requires*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

1.4b: *Implement its policy requiring supervisors to check bills for appropriate use. In doing so, the Department should establish a mechanism for supervisors to demonstrate that they have checked the appropriate use of the devices before the bill is paid*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

1.4c: *Enhance its wireless device policy referencing the State's wireless devices policy to ensure employees are aware they must comply with the policy, and incorporating more of the State's wireless devices policy into its own policy by adding more detailed guidance and criteria for determining when a wireless device is in the best interest of the State, such as when the employee's job requires considerable time outside the office, and by adding a more thorough description of appropriate business use; and*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

1.4d: *Enhance its wireless device policy to include a written requirement for a more frequent assessment of unused cell phones and Internet access devices by adding this assessment into the policy's required monthly review of wireless plans*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendations will be implemented.

Recommendation 1.5: *Once the Department has added more detailed guidance and criteria for determining when a wireless device is in the best interest of the State, it should review all positions that have a wireless device to ensure wireless devices are distributed only to those individuals meeting the established criteria.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.6: *The Department should develop and implement a policy and procedure for employee recognition gifts, including retirement plaques. This policy and procedure should include guidance on how to determine and document the public purpose of employee gifts, and an explanation showing that the cost of such a gift does not outweigh the benefit to the public.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.7: *The Department should provide additional training. Specifically, the Department should train department staff and commissioners on:*

1.7a: *The importance of the Department's policies and procedures and a strong control environment*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

1.7b: *Their responsibilities toward ensuring proper stewardship of public monies; and*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

1.7c: *New or enhanced policies and procedures, such as those related to the Special Operations Unit, travel, wireless device usage and monitoring, and employee recognition gifts.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.8: *The Department should increase its oversight of expenditures by ensuring that its internal audit schedule regularly includes those areas most vulnerable to fraud or abuse, and where the Department has established new or enhanced procedures, including areas such as travel, wireless devices, and the Special Operations Unit's enhanced procedures.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.9: *The Department should develop a cost allocation policy and procedures for how to allocate general agency costs among its restricted funds.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 1.10: *Once this cost allocation method is developed, the Department should train staff on this method.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Finding 2: Process for issuing big game hunting permits could be improved. Overall, the Department agrees with the elements of Finding 2.

The draw is one of the most critical processes the Department executes. The Department strives for an error-free process in the draw and believes that hunters should expect their applications to be processed correctly. While instances of error and license fraud have happened, they are infrequent. Additionally, if the Department has made an error, there is a process that provides solutions to address those situations. The Department expends significant resources and effort to ensure the draw runs accurately, and remains committed to continuously improving the draw process.

The Commission has directed the Department to evaluate options for transitioning to an all online system over the next few years. The Department recognizes that allowing applicants to submit paper applications contributes to inefficiency in the draw process. The Department understands that there are some people who prefer not to apply online, and is considering alternatives to ensure all eligible individuals can apply for the draw once a transition to an all online system is realized.

License fraud, such as a non-resident applying for the draw as a resident, is a criminal offense. The Department investigates these cases diligently. The Commission conducts civil hearings for those who have been convicted, and outcomes can include revocation of licenses to take wildlife in Arizona and compensation to the state for loss of wildlife. Revocation of Arizona license privileges also results in loss of license privileges in 43 other states under the Wildlife Violator Compact.

The Department is continuously exploring new methods to identify potential fraud cases. However, because the problem is not widespread, a cost and benefit analysis should be conducted before employing additional techniques to detect fraud. Recently, Department investigators compared information from Arizona and New Mexico big game applicants. The project compared more than 228,000 names looking for individuals who claimed residency status in both states, and found only six cases of potential fraud.

The audit report mentions that the state of Colorado requires online applicants to submit their driver's license number, which are then checked against the state's motor vehicle database to see if the licensee meets hunting license residency requirements. Although the audit report does not specifically recommend that the Department do the same, possession of an Arizona driver's license does not necessarily establish residency. For example, individuals are required to possess an Arizona driver's license if they work in Arizona, even if their permanent residence is in another state. In addition, a driver's license is not required to hunt in Arizona.

The Department agrees additional post-draw testing and validation of the draw results could be beneficial. Currently, the draw system produces summary reports that list tags awarded and the associated financial charges. Department staff manually validates these reports.

The Department employs the following steps to assure that the draw functions properly:

- The draw system code is stored on secure servers
- Draw system code changes go through technical and business functional testing
- Weekly meetings are held to review the draw to identify and resolve issues
- All code changes require a peer review
- All production changes must be approved

Prior issues with the Online License Sales and Draw system were caused by peak demand periods. The Department worked with the Arizona Department of Administration (ADOA) to adjust load balance and capacity settings which resolved the issue.

Recommendations:

Recommendation 2.1: *The Department should continue its efforts to move toward an all-online application system. Specifically Department should:*

2.1a: *Develop and implement ways to encourage applicants to apply for the draw online.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

2.1b: *Develop and implement a plan to help applicants who cannot apply online.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

2.1c: *Address past problems with the online application to ensure that it can fully support an all-online application*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

2.1d: *Seek commission approval as necessary, to modify its administrative rules to specify the ways in which applicants can submit their applications for the draw.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 2.2: *The Department should modify its online application system to require applicants to apply using a single department ID number and should provide a mechanism for applicants to retrieve their ID number or use an alternate number, such as their driver's license number, if they forgot their department ID number.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 2.3: *The Department should increase its efforts to verify an applicant's residency, and as necessary, seek commission approval of its methods.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 2.4: *The Department should do more testing after the draw to better ensure that the draw functioned as intended and that the draw results comply with statutes and administrative rules. Specifically, the Department should enhance its testing guidelines to include:*

2.4a: *Steps to verify that tags awarded in the first round went first to those applications with the most bonus points, as required by administrative rule.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

2.4b: *Steps to select and review a sample of applicants to test that the applications were successfully processed at each step of the draw process and that the draw results were what would be expected.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 2.5: *To identify patterns of problems and potential areas for improvement in the draw, the Department should:*

2.5a: *Develop and implement a mechanism to track complaints related to the draw that its customer service staff receive or that are submitted through its Web site, or other sources, such as its ombudsman.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

2.5b: *Develop and implement a process for periodically assessing the draw complaints received by its customer service staff, or through its Web site or other sources, such as its ombudsman, to identify areas where the Department may need to make changes to ensure that the draw process is meeting requirements and operating as intended; and*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

2.5c: *Train staff on this process*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Finding 3: Department should improve its information technology systems management processes. Overall, the Department agrees with the elements of Finding 3.

The Department agrees that improvements to IT policies and procedures would be beneficial. A concern expressed in the audit report is the Department may not have formalized policies and procedures to make significant changes to its licensing system. In 2012, the Department set a target date of January 1, 2014 to implement the system to accommodate the new license structure initiative in an effort to better serve our customers. The changes to the licensing structure resulted from customer suggestions, extensive public input and legislative authorization. The Department had intended to use the State's contracted vendor to modify the licensing system.

When the state-wide vendor's contract with ADOA was not renewed in 2013, the Department was presented with multiple challenges in meeting the January 1, 2014 implementation date. Prior to this initiative, the Department's IT team had not been responsible for developing key systems and thus had not instituted or formalized software development policies and procedures. After evaluating alternatives, the Department determined that the best course of action was to employ professional software developers and establish internal policies and capabilities necessary to build the new system.

Due to the loss of the state's contracted software vendor the Department took the following actions to develop key systems:

- Hired experienced software development staff
- Implemented a standard Systems Development Life Cycle
- Instituted a Change Management Procedure
- Built a system technology integration lab
- Built a development and test platform
- Initiated the internal development project

In May 2012, the Department instituted the preliminary Change Management Procedure and has since matured that process to include test plans, test validation results, back-out plans, communication plans, and peer reviews. All changes must be presented along with this material during the Department's Daily Operations Briefing and must be approved prior to being implemented. The Department continues to improve this process to minimize risk and promote efficiency.

Changes to systems centrally managed are tracked according to the Department's Change Management Procedure. Systems determined to be Key Department Systems are incorporated into this procedure and recorded in the Daily Operations Report.

Many organizations, including Fortune 500 companies, don't use automated tools to track changes on all systems. Instead, they use automated tools to track changes only on their critical systems. The Department will evaluate the costs and benefits, and will implement methods and tools for automated tracking of changes on key systems as appropriate.

In compliance with ADOA policy to protect sensitive data, such as hunt applicant information, the Department currently uses firewalls to shield its systems and data, and uses Symantec's PGP to encrypt sensitive data. The Department will continue to be vigilant in protecting sensitive data.

The Department has defined critical systems requiring disaster recovery through the State's Continuity of Operations Plan (COOP) process. Currently all critical systems are hosted in the ADOA data center, and are managed by ADOA's Disaster Recovery plan. ADOA maintains two data centers that are currently operational and the successful transition between the two has been exercised multiple times in the past twelve months. As the Department develops and hosts critical systems, it will review, test, and update its Disaster Recovery plan and will store electronic and physical copies of the plan on and offsite.

Recommendations:

Recommendation 3.1: *To improve systems development practices, the Department should develop and implement a formal SDLC methodology to help ensure all IT systems are developed and maintained consistent with IT standards and best practices. This methodology should include steps for IT system development including planning, analysis, selection, design, testing, implementation, and maintenance.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 3.2: *To strengthen change management practices the Department should:*

3.2a: *Enhance its draft change management policy and develop change management procedures that are consistent with IT standards and best practices, by incorporating specific sequential steps, including testing and formal approval steps, and guidance on other areas such as roles and responsibilities of the persons involved and how to classify and prioritize changes;*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.2b: *Ensure changes to all key Department systems, including systems that are not centrally managed, are tracked in its manual change management tracking mechanism, so that it is consistently tracking all changes;*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.2c: *Require all changes to be adequately documented to include all necessary information such as prioritizations, approvals, testing plans, and implementation plans;*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.2d: *Consistently maintain all documentation required for each change in a central location; and*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.2e: *Develop a method, such as use of automated system change logs, to record all changes made directly to its systems and databases in order to enable monitoring of changes. In addition, the Department should regularly monitor its system change logs to identify unauthorized changes.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 3.3: *To ensure its IT contracts include important elements and that contracted service providers perform as required, the Department should develop and implement formal written policies and procedures for developing IT service provider contracts and overseeing IT service providers. Procedures should require the following:*

3.3a: *IT service provider contracts or agreements include clearly defined roles, responsibilities, and requirements of both the service provider and Department, such as who is responsible for managing and monitoring access to the Department's systems and data; and*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.3b: *Continual monitoring and oversight processes be performed by either the Department or an independent source;*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.3c: *Before participating in state-wide contracts, the Department should determine whether these contracts cover all of its critical requirements, such as providing for the security of its systems and data. Specifically, the policies and procedures the Department develops and implements should require it to review state-wide contracts, and obtain and document additional clarification from the contractor as necessary to ensure all of its critical requirements will be met.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 3.4: *The Department should develop and implement formal written policies and procedures for backing up its systems and data according to state policy. Its policies and procedures should require the Department to:*

3.4a: *Back up its system and data periodically using a defined cycle based on the criticality of its business processes;*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.4b: *Further protect confidential information by using encryption technologies that would make the data unreadable to unauthorized users; and*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.4c: *Test backups regularly to ensure successful recovery of data.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 3.5: *The Department should develop and implement a formalized disaster recovery plan consistent with IT standards and best practices. This plan should:*

3.5a: *Require the periodic review and update of the plan as necessary.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.5b: *Encompass all system and infrastructure components for which it is responsible, and address important elements such as regulatory and contractual requirements, and the Department's overall business-continuity needs.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.5c: *Require that the disaster recovery plan be tested on a regular basis so the Department can discover its strengths and weaknesses, and update the plan based on the test's results.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.5d: *Explicitly state who is involved in the disaster recovery team and what their roles and responsibilities are, what systems are most critical, the order in which to recover systems, and any other pertinent information required to bring the infrastructure back up as quickly as possible.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

3.5e: *Require copies of its disaster recovery plan be in both digital and physical form that are also stored off-site.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 3.6: *The Department should continue its efforts to identify and develop IT policies and procedures around all critical IT areas.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 3.7: *The Department should ensure that its formalized IT systems management and other IT policies and procedures are disseminated and communicated to necessary staff, and that staff are adequately trained on these policies and procedures.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Finding 4: Commission improving compliance with open meeting law.

Overall, the Department agrees with the elements of Finding 4.

The audit report notes that the Department already has comprehensive procedures to ensure the Commission's compliance with open meeting law. The Department is proud of its compliance with open meeting law and will continue to safeguard this important public right.

Recommendations:

Recommendation 4.1: *The Department should continue its efforts to help ensure the Commission complies with the State's open meeting law by posting notices of commission meetings in the front counter areas of its Phoenix office and all of the regional offices.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Recommendation 4.2: *The Department should develop and implement comprehensive procedures to help ensure the Commission's continued compliance with the State's open meeting law. These procedures should include who at the Department is responsible for overseeing compliance as well as for performing the various open meeting law tasks, such as:*

4.2a: *Posting an appropriate disclosure statement online;*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

4.2b: *Posting electronic and hard copies of commission meeting notices and agendas 24 hours in advance.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

4.2c: *Posting approved written commission meeting minutes on the department Web site; and*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

4.2d: *Including all required elements in commission meeting minutes.*

Response: The recommendation of the Auditor General is agreed to, and the audit recommendation will be implemented.

Conclusion:

The Arizona Game and Fish Department and Commission are grateful for the opportunity to assess and improve our internal systems. The Department and Commission are confident that we will continue to comply with state and ADOA standards and hope to raise those standards by setting an example of improved performance. The Auditor General's Office is to be commended for its thoroughness and fairness in its assessment of the Department's operations.