State Auditor's Office

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An Audit Report on

The Development of the Texas Child Support Enforcement System 2.0 at the Office of the Attorney General

July 2011
Report No. 11-035

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Overall Conclusion

The Child Support Division (Division) within the Office of the Attorney General (Office) has implemented substantial controls that increase the likelihood that it can successfully deliver the new automated child support enforcement system on time, on budget, with adequate security, and with agreed-upon functionality.

As of May 2011, the Division estimated that it will complete the Texas Child Support Enforcement System 2.0 (TXCSES 2.0) initiative by December 2017 at a total cost of $202.7 million. The federal government is expected to pay 66 percent ($133.8 million) of those costs, and the State will pay the remaining 34 percent ($68.9 million). The TXCSES 2.0 initiative received approval from the U.S. Federal Office of Child Support Enforcement in July 2009 and, as of January 19, 2011, the Division had spent $43.9 million on the initiative.

> **Background Information**
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> The Child Support Division (Division) within the Office of the Attorney General is transforming its existing Texas Child Support Enforcement System (TXCSES), which was implemented in 1997.
>
> The current TXCSES automated activities required to establish child support orders; enforce order compliance; and collect and disburse child support payments. The Division reported that the current system maintained information on approximately 1.2 million cases and processed more than $2.9 billion in collections and disbursements of child support payments in fiscal year 2010.

The Division is implementing the TXCSES 2.0 initiative so that it can (1) meet increasing customer service demands, (2) manage a growing and changing child support enforcement caseload, (3) improve its automation of processes, and (4) adapt to a changing workforce. Among the expected improvements from the TXCSES 2.0 initiative are:

➢ The elimination of paper case files.

➢ The ability to access the system through the Internet.

➢ Enhanced access controls.

The Division plans to complete the first of the TXCSES 2.0 initiative's three phases by October 2013. The Division originally planned to complete the five projects that comprise phase 1 between August 2012 and December 2012; however, the Division postponed the completion of phase 1 to comply with budget reductions by shifting its spending of $27.6 million from the 2012-2013 biennium to the current and subsequent biennia.

The Division contracted with two firms to help it redesign its business processes for delivering child support enforcement services and to develop and implement the

This audit was conducted in accordance with Texas Government Code, Section 321.0132.

For more information regarding this report, please contact Ralph McClendon, Audit Manager, or John Keel, State Auditor, at (512) 936-9500.

TXCSES 2.0 initiative. The Division's contracts with those development firms state that the contractors will be paid based on a fixed price for the completion of each TXCSES 2.0 initiative deliverable. This complies with guidelines in the *State of Texas Contract Management Guide*, which indicates that dividing contractor payments into amounts that each reflects a small deliverable is an effective technique for managing financial risk on a large project.

The Division also has developed and implemented controls that are designed to reduce the risk of project delays, budget increases, security weaknesses, and functionality problems. The Division could improve its management of the TXCSES 2.0 initiative by properly monitoring the initiative's status, risk, and schedule.

The Office should ensure that the Division strengthens its communications management plan for the TXCSES 2.0 initiative so that communication needs and expectations are communicated to all appropriate stakeholders, including the Office's internal audit division. In addition, the Division should ensure that it consistently complies with the State's requirements for reporting project activity.

Summary of Management's Response

The Office agreed with the recommendations in this report.

Summary of Information Technology Review

Auditors reviewed selected automated controls to assess the reliability of data from the Division's TXCSES 2.0 initiative project management scheduling system and TXCSES 2.0 initiative expenditure data. This review included access control testing over:

➢ The Office's automated purchase voucher generation system. Auditors determined that the controls over authorized access to that system were working properly.

➢ The Division's TXCSES 2.0 initiative project management scheduling system. Auditors determined that the Division has implemented strong monitoring controls over the data from this system that compensate for the use of group passwords for data entry.

Summary of Objective, Scope, and Methodology

The objective of this audit was to determine whether the Office's development of the TXCSES 2.0 initiative adheres to Department of Information Resources' guidelines, the *State of Texas Contract Management Guide*, and other laws and best practices to help ensure that the project will be delivered on schedule, on budget, with an appropriate level of security, and with the agreed-upon level of user functionality

The scope of this audit covered transactions and events related to the TXCSES 2.0 initiative that occurred between January 2007 and April 2011.

The audit methodology consisted of collecting information and documentation, performing selected tests and other procedures, analyzing and evaluating the results of the tests, and conducting interviews with management and staff at the Office. In addition, auditors assessed the reliability of the Office's TXCSES 2.0 initiative expenditure data from January 2, 2008, through January 12, 2011, and assessed the data reliability of the Office's TXCSES 2.0 initiative project management scheduling software program (MS Project) as of January 24, 2011.

Auditors also communicated less significant issues to Office management separately in writing.

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Detailed Results

The Division Plans to Complete the Texas Child Support Enforcement System 2.0 in December 2017 at an Estimated Cost of Approximately $202.7 Million

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Implementation of the TXCSES 2.0 Initiative

In federal fiscal year 2007, the Office of Attorney General's Child Support Division (Division) began an effort to evaluate inefficiencies in its current processes and technologies. The Division completed an analysis in federal fiscal year 2008 that resulted in an incremental plan to develop projects to renew the existing child support enforcement system using newer technologies, which resulted in the creation of the TXCSES 2.0 initiative. (Appendix 2 contains a road map of that plan).

The plan to design and implement the TXCSES 2.0 initiative has three phases:

- Phase 1 – <u>Case Initiation Locate and Renewal</u>. Phase 1 consists of five projects that will automate case initiation and processes to identify and locate noncustodial parents. Additionally, Phase 1 projects will add new business capabilities, such as virtual case files, and technical infrastructure to support the TXCSES 2.0 initiative.

- Phase 2 – <u>Establishment and Enforcement Renewal</u>. In this phase, the Division will automate business processes used to establish an obligation to support children in a child support case.

- Phase 3 – <u>Financial Renewal</u> - In this phase, the Division will renew the financial business processes to make financial data more accessible and data processing more efficient.

See Appendix 3 for more information about the TXCSES 2.0 initiative and its three phases.

Source: Child Support Division.

The Office of Attorney General's (Office) Child Support Enforcement Division (Division) estimates that it will complete the Texas Child Support Enforcement System 2.0 (TXCSES 2.0) initiative by December 2017 at a cost of $202.7 million. The federal government is expected to pay 66 percent ($133.8 million) of those costs, and the State will pay the remaining 34 percent ($68.9 million). As of January 19, 2011, the Division had spent $43.9 million on the initiative.

The Division originally planned to complete the five projects that comprise Phase 1 of the TXCSES 2.0 initiative between August 2012 and December 2012. The Division postponed completion of Phase 1 to October 2013 to comply with budget reduction requirements by shifting its planned spending of $27.6 million from the 2012-2013 biennium to other biennia (see Table 1). The planned changes included prepaying maintenance for the 2012-2013 biennium in fiscal year 2011, delaying implementation of TXCSES 2.0 Phase 1 projects, and eliminating some fiscal year 2013 contractor costs.

Table 1

Shift of the TXCSES 2.0 Initiative Budgeted Expenditures to Comply with Budget Reduction Requirements (Amounts are in millions)			
Biennium	**Original Budget**	**Revised Budget**	**Difference** [c]
2010-2011 [a]	$57.7	$64.0	$6.4 [b]
2012-2013	$67.1	$39.5	($27.6)
2014-2015	$39.9	$58.4	$18.5
2016-2017	$21.2	$24.9	$3.7

[a] Amounts do not include funds already expended as of July 2010.

[b] The fiscal year 2010-2011 expenditures contain only budgeted expenditures for fiscal year 2011.

[c] Row does not sum exactly due to rounding.

Source: The Division.

The Division Employed Two Primary Contractors to Redesign Its Business Processes and Create TXCSES 2.0

The Division hired two primary contractors that built automated child support enforcement systems in other states to design and develop the TXCSES 2.0 initiative. The Division employed the first contractor (methodology contractor) for the initial business process redesign project. The Division asserts that it currently employs staff members who are child support enforcement experts, but the Division did not have employees with the skills needed to design, build, and implement a new automated child support system. Additionally, the Division had not attempted to develop a system costing more than $20 million in more than 10 years.

The Division selected a second contractor (developer contractor) to design, develop, and implement the TXCSES 2.0 initiative. The Division employed a second contractor because Texas Government Code, Section 2155.004, prohibited the methodology contractor from accepting a bid or award for the design, development, and implementation solicitation because it received compensation for preparing the specifications of the solicitation.

Both contractors have experience that is applicable to the TXCSES 2.0 initiative. Specifically:

- The methodology contractor redesigned business processes for child support enforcement programs in Florida and Indiana.

- The developer contractor built automated child support enforcement systems in other states, including Michigan and New Mexico.

- One or both of those contractors worked on other major system development projects for the State, including the Texas Integrated Eligibility Redesign System (TIERS), the Statewide Enterprise Resource Planning System (ProjectOne), and the existing Texas Child Support Enforcement System.

The Division signed a contract with the methodology contractor on January 19, 2007, and it signed a contract with the developer contractor on October 5, 2010. Those contracts:

- Provide payment to the contractor based on a fixed price for the completion of each deliverable. The *State of Texas Contract Management Guide* indicates that dividing overall payments into smaller amounts that each reflects a small deliverable is an effective technique for managing financial risk.

- Included solicitations that the State's Contract Advisory Team reviewed, as required by Texas Government Code, Section 2262.101.

- Contained the essential contract terms required by the *State of Texas Contract Management Guide*.

- Adequately protect the Division from the contractor executing unauthorized change orders.

The two contracts differed significantly in the way they were developed. Specifically:

- The contract with the methodology contractor started as a solicitation for a business process redesign. The initial contract was valued at $1.8 million. The Division subsequently negotiated four renewals with the methodology contractor, increasing the total contract value to $40.7 million. Most key deliverables were described in the subsequent contract amendments, whose total value was $38.9 million.

- The $69.8 million contract with the developer contractor was a single contract with no amendments as of May 2011. The original contract solicitation described all of the deliverables. As a result, the Contract Advisory Team was able to examine the specifications for all of that contract solicitation's key deliverables.

Chapter 1-B
The Division Has Begun Redesigning Its Business Processes and Preparing to Design the TXCSES 2.0 initiative

As of the end of audit fieldwork in April 2011, the Division had:

- Developed a project methodology (see Chapter 4 for more information).

- Divided the project into incrementally developed phases to accommodate fluctuations in funding.

Joint Application Development Session

During a joint application development session, persons who will be key users of the proposed system collaborate with the system developers to resolve any differences regarding system design.

Source: National Institute of Standards and Technology.

- Refined the business processes to be automated in the TXCSES 2.0 initiative through the use of joint application development sessions (see text box). This collaborative design of business processes supports management's efforts to reach an agreed-upon level of functionality in the TXCSES 2.0 initiative

- Implemented security procedures that are appropriate for the TXCSES 2.0 initiative's current stage of development.

- Initiated a process through which the methodology contractor transfers information related to the business processes and system development methodology to the developer contractor.

- Assembled a team of key managers and contractor personnel who have the required qualifications for their respective positions based on the project criteria that the Division established.

The Division Has Designed Controls That Should Help It to Deliver TXCSES 2.0 Initiative on Schedule

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**Project Management
Body of Knowledge**

The Project Management Institute's *Project Management Body of Knowledge* is a recognized industry standard for the project management profession that describes established norms, methods, processes, and practices for project management. Those standards are widely accepted and, when consistently applied, can help organizations achieve specific project, program, and portfolio management results.

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Critical Path

Critical path is a methodology used to determine the shortest time possible to complete a project and help project managers identify the following:

- Which scheduled tasks are critical because if they are not completed on time, the entire project will be delayed.

- The earliest start and finish date of a project.

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The Division implemented controls to help it deliver the TXCSES 2.0 initiative on schedule. The controls that auditors reviewed conformed to tools and techniques in the Project Management Institute's *Project Management Body of Knowledge* (see text box). The Division should use its controls as designed and consider implementing earned value management to better measure project performance.

The Division developed an adequate project schedule and scheduling tools that conform to most industry standards. The Division created a project management plan and a project schedule ("master work plan") for each of the TXCSES 2.0 initiative's phase 1 projects. The project management plan defines how the project should be executed, monitored, and controlled. Seven project management plans that auditors reviewed referenced the master work plan, which details the schedule of tasks, including baseline dates, completed activities, and started activities.

As of April 2011, the Division used MS Project software to track project activities. MS Project has the capability to provide the Division with information necessary to manage the TXCSES 2.0 initiative. Management documented the critical path (see text box) within MS Project. Identifying the critical path enables the Division to identify all the tasks that directly affect the TXCSES 2.0 initiative's end date.

In addition to monitoring the critical path, the Division uses milestone reporting to monitor potential slippage before milestones fall behind schedule. Milestones are actions or events marking a significant change or stage in development. Milestone reports document the current start and finish date of each task and also contain baseline start and finish dates, which enable report users to compare current milestone dates with the originally planned dates.

According to the Division's milestone reports, from March 2009 to January 2011, 184 milestones were, on average, 35 calendar days late. Division management asserts that intermediate delays will not affect the overall project completion date.

In addition to milestone reports, the Division uses status reports to monitor four key areas: schedule, risk, quality management, and issues. The objective of those reports is to help ensure that all relevant stakeholders are notified in a timely manner about the initiative's progress and issues. The TXCSES 2.0

initiative's project and portfolio managers included in the status reports some of the information required by the TXCSES 2.0 initiative's delivery management plan (see text box). Specifically, of the 110 status reports from December 2010 through February 2011 that auditors tested:

- 90 (82 percent) contained the required information for reporting issues.

- 71 (65 percent) contained the required information for reporting risks.

- 29 (26 percent) contained the required information for reporting milestone variances.

- 27 (25 percent) contained the required information for reporting schedule variances.

The Division should follow the requirements listed in the delivery management plan for documenting the key elements on status reports. Completely documented status reports provide key stakeholders accurate information that can be used in decision making for the TXCSES 2.0 initiative and help the system to be delivered on schedule.

The Division should consider using industry best practices for calculating schedule variances. "Schedule variance" is a key status report element. Currently, the Division does not have a standard methodology for determining project progress. Instead, the Division relies on manager judgment about whether a project is on schedule, behind schedule, or ahead of schedule. The Division should consider using an industry best practice for calculating schedule variances. The *Project Management Body of Knowledge* recommends that organizations use the earned value management methodology (see text box for definition) to determine project performance because it is less subjective than other methods. Accurately calculating schedule variances is important to helping key stakeholders manage the TXCSES 2.0 initiative and increases the likelihood that the system can be delivered on schedule.

Recommendations

The Office should ensure that the Division:

- Follows established procedures and policies outlined in the delivery management plan for reporting status.

- Considers implementing earned value management methodology for determining schedule performance for the TXCSES 2.0 initiative and its individual projects.

Management's Response

- *The OAG agrees to follow its established procedures and policies outlined in the delivery management plan for reporting status. For the 110 status reports from December 2010 through February 2011 that the SAO auditors tested, the CSD agrees that the individual project status reports specified did not contain the required information; however, the TXCSES 2.0 Initiative Status Report, which combines status of all projects that comprise the initiative, did include the required information.*

- *The OAG is currently working to implement a mechanism to track earned value.*

Implementation Date*: August 31, 2011*

Responsible Party*: TXCSES 2.0 Initiative Tracking and Delivery Assurance Manager*

The Division's Change Control Management and Risk Management Processes for the TXCSES 2.0 Initiative Substantially Comply with Industry Standards

The Division implemented processes and controls relating to change control management and risk management to help it deliver the TXCSES 2.0 initiative on schedule and on budget. The change management controls substantially conform to industry standards in the *Project Management Body of Knowledge*. The *Project Management Body of Knowledge* describes established norms, methods, processes, and practices for project management. To improve the effectiveness of the risk management controls, the Division should use the controls as described in the TXCSES 2.0 initiative's delivery management plan.

Chapter 3-A
The Division Established Change Control Processes for the TXCSES 2.0 Initiative That Conform to Industry Standards

> **Change Management**
>
> "Agencies should have an effective change management process in place. Failure to manage and control changes can result in an unintentional modification to the scope of work, extension of the schedule, increase in the contract cost, circumvention of management controls and diminished contractor accountability."
>
> Source: *State of Texas Contract Management Guide*, Version 1.6.

To effectively manage the TXCSES 2.0 initiative's cost, scope, and schedule, it is essential that the Division sufficiently control changes to the project (see text box). The Division manages change requests for the TXCSES 2.0 initiative by (1) controlling how additional contract charges can be incurred, (2) requiring change requests to be approved by governing committees, and (3) documenting its change control procedures. The Division's current change control procedures for the TXCSES 2.0 initiative substantially conform to *Project Management Book of Knowledge* industry standards.

Top management has final decision regarding increased contract charges.
Vendor costs for the two largest TXCSES 2.0 initiative contracts are a major component of the initiative's total estimated costs: Estimated vendor costs are $126 million, or 62 percent of the initiative's $202.7 million total costs. The Division controls those vendor costs through contract payment terms. Specifically, the Division makes payments based on the vendor's completion of deliverables, for which the Division will pay a contractually set price.

In addition, Division management must approve change orders and additional contract amendments for the contractually set prices to increase. To effectively manage the TXCSES 2.0 initiative's scope, cost, and schedule, the Division must effectively control contract change requests. To do this, key managers or the TXCSES 2.0 initiative steering committee must approve all contract changes requests. The Division controlled additional costs to the methodology contract through the use of one-year contract amendments, which added vendor tasks.

Governing committees approve change requests. The *Project Management Book of Knowledge* contains industry standards for change control, including creating a change control board that should:

- Meet to review all change requests.

- Approve or reject change requests.

- Consist of various stakeholders who provide their expertise.

- Have a clearly defined role and responsibilities as agreed upon by the appropriate stakeholders.

According to the TXCSES 2.0 initiative's delivery management plan, a steering committee and three other governing committees,[1] which report to the steering committee, are responsible for change control. Each of those committees meets on at least a monthly basis and contains stakeholders with the appropriate expertise to monitor change orders for the TXCSES 2.0 initiative. The Division has developed a charter for all of the committees except the steering committee. A charter documents in detail a committee's role and responsibilities. Each committee documents the results of its meetings through status reports or committee minutes.

The Division is implementing new automated change control processes for the TXCSES 2.0 initiative. During the fieldwork phase of this audit, the Division implemented new automated controls to replace some of the manual change control management processes for the TXCSES 2.0 initiative. Auditors reviewed the design of the new controls but were not able to assess the effectiveness of the controls because they were newly implemented. Based on their design, the new automated controls appear sufficient for tracking change control requests for the TXCSES 2.0 initiative.

Chapter 3-B

The Division Substantially Complies with the TXCSES 2.0 Initiative's Risk Management Processes

The Division substantially performs risk management according to the requirements outlined in the initiative's delivery management plan. Proper risk management significantly decreases the probability and effect of negative events on a project. The Division substantially complied with its procedures to identify, assess, and respond to risks.

The Division should improve its risk management for the TXCSES 2.0 initiative by ensuring that the Division documents its monitoring of severe or significant risks. Specifically, the Division identified 26 risks that were either significant or severe that were still active on April 1, 2011; however, the

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[1] The three committees are the Business Services Council, the Software Engineering Process Group, and the Architecture Review Board.

Division lacked documentation showing that it monitored 13 (50 percent) of the 26 identified significant or severe risks on a weekly basis. The TXCSES 2.0 initiative's delivery management plan states that the Division will monitor significant or severe risks through weekly status meetings.

Recommendations

The Office should ensure that the Division:

- Uses the change management controls for the TXCSES 2.0 initiative as designed.

- Continues to follow established policies and procedures for risk management, as outlined in the TXCSES 2.0 initiative's delivery management plan, and improve its documentation for the monitoring and reporting of risks identified as significant or severe.

- Considers creating a charter for the TXCSES 2.0 initiative's steering committee.

Management's Response

- *The OAG agrees to use the change management controls for the TXCSES 2.0 Initiative as designed.*

- *The OAG agrees to continue to follow established policies and procedures for risk management, as outlined in the TXCSES 2.0 Initiative's delivery management plan, and improve its documentation for the monitoring and reporting of risks identified as significant or severe. To begin addressing the improvement recommendation regarding risk documentation and effective monitoring of risks, the OAG has assigned a Risk and Issue Manager to the TXCSES 2.0 Initiative, Dawna Aigner, effective June 20, 2011.*

- *The OAG is in the process of converting TXCSES 2.0's risk and issue matrices to a centralized repository using Rational ClearQuest, which will improve overall monitoring, control and status reporting of risks and issues.*

Implementation Date: August 31, 2011.

Responsible Party: TXCSES 2.0 Initiative Manager

- *Although the role of the TXCSES 2.0 Initiative's steering committee is defined in the TXCSES 2.0 Initiative Charter, OAG agrees to create a separate charter for the steering committee.*

Implementation Date: August 31, 2011

Responsible Party: TXCSES 2.0 Initiative Director

The Division's TXCSES 2.0 Initiative System Development Methodology Is Substantially Complete Compared with Industry Standards and Best Practices

The Division's TXCSES 2.0 initiative system development methodology is substantially complete compared with industry standards. The Division should strengthen its TXCSES 2.0 initiative system development methodology to more completely align with industry standards and best practices, especially with regard to ensuring complete participation of all project stakeholders.

Chapter 4-A
The Division Should Ensure That Its Schedule Management Plan and Communications Management Plan Align with Industry Standards

The methodology contractor created a two-part system development methodology (methodology) for the Division to use to design and develop the TXCSES 2.0 initiative. The first part of the methodology is a high-level guide (which the Division calls the "playbook") that can be used for all Division system development initiatives, not just for the TXCSES 2.0 initiative. The second part of the methodology consists of specific project management plans for each TXCSES 2.0 project.

There are several industry standards against which to measure system development methodologies. For example, federal regulations subject federally-sponsored total system redesign initiatives, like the TXCSES 2.0 initiative, to potential independent verification and validation reviews. In its guide for such reviews, the federal Office of Child Support Enforcement, which is the Division's federal sponsor for the TXCSES 2.0 initiative, lists the following industry standards as criteria that can be used to perform a review:

- The Institute of Electrical and Electronics Engineers' standards.

- The Project Management Institute's Project Management Body of Knowledge.

- The IT Governance Institute's Capability Maturity Model Integrated approach.

The *Project Management Body of Knowledge* indicates that a project management plan can be either a summary-level plan or a detailed plan, and it can be comprised of one or more subsidiary plans. Some examples of subsidiary plans include:

- Communications management plan.

- Requirements management plan.

- Risk management plan.

- Schedule management plan.

- Quality management plan.

- Scope management plan.

Auditors selected two of those subsidiary plan types—the communications management plan and the schedule management plan—and compared the TXCSES 2.0 initiative's methodology with the descriptions of those plans in the *Project Management Body of Knowledge*. Auditors determined that:

- The Division created communications matrices and other communication-related documents for the TXCSES 2.0 initiative and some of the Phase 1 projects. When combined, that documentation has the functionality of a communications management plan as described in the *Project Management Body of Knowledge*. The Division's communications management plan included most key stakeholders, but it should have also included the Office's internal audit division (see Chapter 4-B).

- The Division had not created a schedule management plan as described in the *Project Management Body of Knowledge*. A schedule management plan defines the rules and approaches for the scheduling process by establishing criteria for developing and controlling the project schedule (see text box for more information).

> **Schedule Management Plan**
>
> The *Project Management Body of Knowledge* defines a schedule management plan as a tool that "selects a scheduling methodology [and] a scheduling tool, and sets the format and establishes criteria for developing and controlling the project schedule."

Chapter 4-B
The Office's Internal Audit Division Recently Increased its Participation in the TXCSES 2.0 Initiative

The Office's internal audit division recently began to have active involvement in the TXCSES 2.0 initiative. In fiscal year 2007, the Division initiated the business process redesign project that resulted in the TXCSES 2.0 initiative. The Division began work on TXCSES 2.0 Phase 1 projects in fiscal year 2009. The Office's internal audit division's fiscal year 2011 audit plan included a project covering the TXCSES 2.0 initiative for the first time, and the internal audit division started the project, which is a non-audit consulting engagement, in January 2011.

The Division's communications management plan for the TXCSES 2.0 initiative did not include the Office's internal audit division. Division management should have actively involved the Office's internal audit division sooner in the process. Internal audit should be a key stakeholder in major system development projects. According to the Institute of Internal Auditors' *Global Technology Audit Guide*, the sooner the auditor engages with a project, the better. Internal audits or assessments performed during the early phases of a project can help identify developing problems and reduce long-term costs of a project.

In addition, the Office's internal audit division's employees have the experience and qualifications to provide useful input for system development projects. For example, two employees are Certified Information Systems Auditors, including the auditor currently assigned to the TXCSES 2.0 initiative.

Increasing the involvement of the internal audit division can help provide additional assurance that proper application and process controls are included in the TXCSES 2.0 initiative.

Recommendations

The Office should ensure that the Division:

- Strengthens its communications management plan for the TXCSES 2.0 initiative to ensure that communications needs and expectations are communicated to all appropriate stakeholders, including the Office's internal audit division.

- Creates a schedule management plan that establishes criteria for developing and controlling TXCSES 2.0's project schedule.

- In addition, the Office should consider strengthening its policies and procedures to include the involvement of the internal audit division early in the development of future information technology projects.

Management's Response

- *The OAG agrees to strengthen its communication management plan for the TXCSES 2.0 Initiative to ensure that communication needs and expectations are communicated to all appropriate stakeholders, including the OAG's Internal Audit Division. The OAG recently assigned a TXCSES 2.0 Transition Management Lead, responsible for ensuring the initiative's communication strategy is defined, maintained, and executed according to the defined processes, and that all key stakeholders are incorporated into the initiative as appropriate.*

Implementation Date: August 31, 2011

Responsible Party: TXCSES 2.0 Transition Management Lead

- *OAG agrees to create a schedule management plan for developing and controlling the TXCSES 2.0's project schedule. OAG would like to specify that while the TXCSES 2.0 Initiative does not currently have a document titled 'Schedule Management Plan,' the initiative has tools, processes and procedures in place to manage and control the TXCSES 2.0's project schedule.*

- *The TXCSES 2.0 Initiative is in the process of developing an initiative-level Project Management Plan (PMP) which includes a Schedule Management Plan and will incorporate the existing schedule management processes and procedures. The TXCSES 2.0 Initiative Tracking and Delivery Assurance Manager is responsible for creating the Schedule Management Plan for inclusion in the PMP. This content has already been provided in draft form for CSD management review and approval.*

Implementation Date: July 29, 2011

Responsible Party: TXCSES 2.0 Initiative Tracking and Delivery Assurance Manager

The Division Has Designed Controls That Should Help It to Deliver the TXCSES 2.0 Initiative on Budget

The Division established the following controls to help improve the probability that the TXCSES 2.0 initiative will be completed on budget:

▪ Completing annual forecasting to determine available funds.

▪ Implementing deliverable review procedures to ensure proper payment of services.

The Division should use its controls as designed to ensure that deliverables are reviewed prior to accepting them as complete and sufficient.

The Division budgets for the TXCSES 2.0 initiative by forecasting available funds and scheduling expenditures. The Division performs annual forecasting to determine the available funding for business plan projects for the following year. Budget analysts then work within their assigned program areas to forecast expenditures for the current year and future years and to determine the amount of funding necessary for the planned projects. Management monitors operational costs throughout the year to determine whether adjustments to the budget are needed.

The Division has established controls to ensure that invoices for deliverables that contractors submit are for the contracted price. The Division must accept the final deliverable before a contractor may submit an invoice for the deliverable. Both the TXCSES 2.0 initiative contract administrator and contract manager review invoices and compare them with information in the Office's automated contract monitoring tool. This information includes data from the contract, including the contract terms and each deliverable's price. If the contract administrator and contract manager verify that the invoice matches the contract price, the contract manager sends an approval memo to the Office's accounting department to proceed with payment to the contractor.

The Division should use its controls as designed to review deliverables prior to accepting the deliverables as complete and sufficient. The Division did not adequately document its review of deliverables that demonstrated that the contractor appropriately resolved all deficiencies associated with the deliverables.

The Division reviewed the deliverable for the Requirements Engineering Plan, which was part of the "Implement IT Infrastructure" deliverable for which the Division paid $669,960 to the methodology contractor. But 19 (21 percent) of 89 deficiencies for the Requirements Engineering Plan were not documented as "resolved" before the Division accepted and paid for that portion of the deliverable.

The Division mitigates the risk of having the project exceed projected costs and time lines if it consistently follows its controls for documenting its review of deliverables.

The Division recently automated the process for correcting deficiencies associated with deliverables. Based on an initial review of the new process, the controls' design appears sufficient to ensure that all comments are reviewed and addressed before deliverables are accepted. Auditors were not able to assess the effectiveness of the newly implemented controls because the Division had not used that process to review any deliverables as of April 2011.

Recommendations

The Office should ensure that the Division:

- Uses the new automated controls effectively to track deliverable deficiencies for the TXCSES 2.0 initiative and ensure that all deficiencies are resolved before the Division accepts deliverables as complete and sufficient.

- Uses the new automated controls as designed so that the controls' effectiveness is not compromised.

Management's Response

- *The OAG agrees to use the new automated controls effectively to track deliverable deficiencies for the TXCSES 2.0 Initiative and ensure that all deficiencies are resolved before CSD accepts deliverables as complete and sufficient. In regard to the "Implement IT Infrastructure" deliverable referred to by SAO on page 16 of this report, per the review spreadsheet, dated August 21, 26, 2009:*

  - *The contractor addressed seven of the 19 deficiencies.*

  - *The OAG agreed that three of the 19 deficiencies did not require a change.*

  - *The OAG agreed to defer nine of the 19 deficiencies. The OAG did not update the review spreadsheet to note that each of these items were "accepted", however, the disposition of each item was noted in the spreadsheet and used as a basis for deliverable approval.*

- *The OAG agrees to use the new automated controls as designed so that the control's effectiveness is not compromised.*

Implementation Date*: July 1, 2011*

Responsible Party*: TXCSES 2.0 Initiative Tracking and Delivery Assurance Manager*

Chapter 6

The Office Should Improve Its Processes to Consistently Comply with State Requirements for Reporting Project Activity

Major Information Resource Project

The Texas Government Code, Section 2054.003, definition of a major information resource project includes any information resources technology project that will cost more than $1 million and requires one year or longer to reach operational status.

State agencies undertaking a major information resource project (see text box for definition) must comply with certain statutory reporting requirements defined in the Texas Government Code and the Department of Information Resources' *Texas Project Delivery Framework*. The Office should improve its processes to ensure that it consistently complies with the requirements for reporting information resource project activity to state oversight entities.

Chapter 6-A

The Office Attained the Appropriate Approvals for Phase 1 of the TXCSES 2.0 Initiative, But It Expended Funds on Phase 2 Before Receiving Required Approvals

The Office submitted its Information Technology Detail[2] for information technology projects as part of its Legislative Appropriations Request for the 2010-2011 biennium by August 27, 2008.

For the TXCSES 2.0 initiative, the Office included only phase 1 projects in its Information Technology Detail. As a result, the Office's biennial operating plan included only Phase 1 projects. During fiscal year 2010, the Office spent $3.9 million on the TXCSES 2.0 Phase 2 project. While the Office submitted a biennial operating plan amendment in May 2011 that included the Phase 2 project, it should have submitted an amendment before it expended any funds on the Phase 2 project. Texas Government Code, Section 2054.100, requires an agency to submit an amendment to the Legislative Budget Board if there is a significant change in the agency's biennial operating plan.

In addition, Texas Government Code, Section 2054.118, requires the agency to receive approval from the Legislative Budget Board and the State's Quality Assurance Team for changes to its biennial operating plan before the agency expends appropriated funds. Biennial operating plan amendments alert the State's oversight entities that a major information resource project is active and requires Quality Assurance Team approval and monitoring. Figure 1 on the next page shows the required time line for reporting and receiving approval for major information resource projects.

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[2] The information technology detail is the agency-prepared precursor to the biennial operating plan (see Figure 1 on the next page).

Figure 1
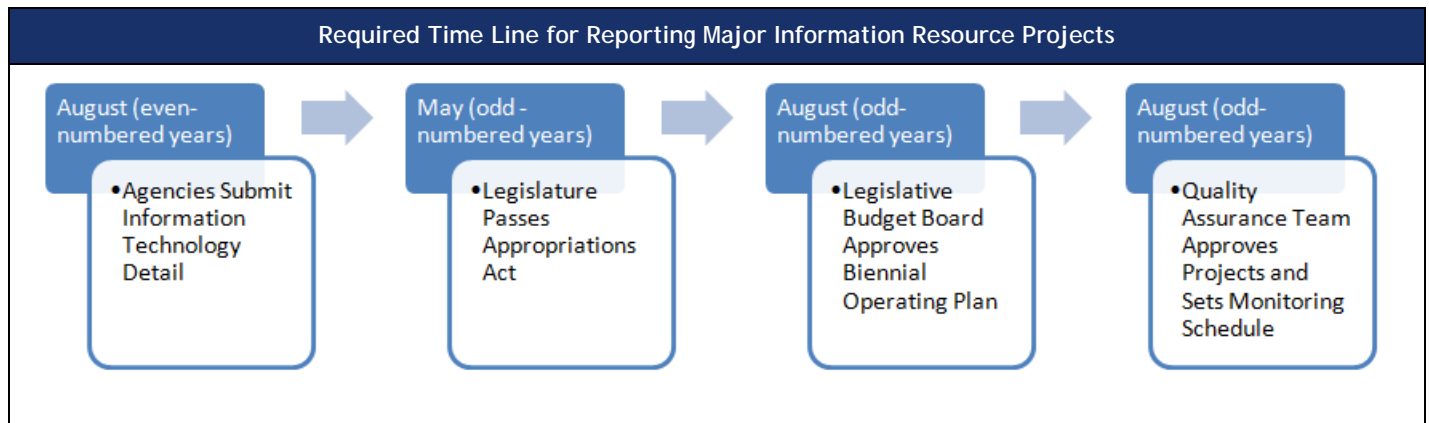
Source: Department of Information Resources' *Texas Project Delivery Framework Handbook, Version 2.5, 21 Dec. 2010.*

The Office estimates that Phase 2 will cost $54.5 million. As of April 2011, it had allocated $10.3 million of infrastructure costs (hardware and software) to Phase 2, in addition to the $3.9 million expended.

Chapter 6-B
The Office Should Improve Its Reporting of Project Activity to the State's Quality Assurance Team

Agencies developing and implementing a major information resource project are required to submit monitoring reports to the State's Quality Assurance Team. Those monitoring reports require the agency to report certain measures, including "Current Estimated Project Cost," "Project Cost to Date," "Current Estimated Project Finish Date," and "Estimated Percentage of Project Complete."

As of November 12, 2009, the Quality Assurance Team had approved and set the monitoring report schedule for Phase 1 of the TXCSES 2.0 initiative. On May 5, 2011, the Quality Assurance Team approved Phase 2 and Phase 3, and the first monitoring reports for those phases were due June 30, 2011.

Auditors reviewed 25 monitoring reports for Phase 1 projects and determined the following:

▪ The Office's cost reporting understated project costs for fiscal years 2009 and 2010 by $2.2 million because the Office did not include:

▪ $964,591 in salary costs for non-IT management positions associated with the project, including the initiative director, the initiative manager, portfolio and project managers, business analysts, and program support employees.

- $1.3 million in employee benefits costs associated with the project.[3]

- The Office estimates the amount of project completion as the percentage of the total dollar budget spent to date. Because the amount spent may not reflect the actual amount of work completed, that methodology does not provide an accurate assessment of project completion.

Recommendations

The Office should:

- Submit amendments to its biennial operating plan, and receive Legislative Budget Board and Quality Assurance Team approval for all significant changes to major information resource projects, such as the TXCSES 2.0 initiative. The Office should not expend appropriated funds on costs related to those amendments until the projects have received the required approvals.

- Accurately report all cost items in Quality Assurance Team monitoring reports, including (1) salary costs of non-IT personnel and (2) benefit costs.

- Choose an industry standard methodology to more accurately assess project completion, and use that methodology to report "Estimated Project Completion" in future Quality Assurance Team monitoring reports.

Management's Response

- *OAG agrees, and has taken appropriate measures to address this oversight for the Phase 2 and Phase 3 projects of the TXCSES 2.0 Initiative. OAG submitted an amendment to the agency's 81st Legislative Session Biennial Operating Plan for the Phase 2 Establishment and Enforcement Renewal and Phase 3 Financial Renewal projects on April 20, 2011. The OAG received approval of the amendment from the Legislative Budget Board on April 22, 2011, and from the Quality Assurance Team on May 5, 2011. Per instruction, OAG will begin submitting quarterly monitoring reports for Phase 2 and 3, to the Quality Assurance Team.*

Implementation Date: May 5, 2011

Responsible Party: TXCSES 2.0 Initiative Director

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[3] Auditors calculated benefit costs based on the statewide employee benefits listed in *A Report on State Employee Benefits as a Percentage of Total Compensation*, State Auditor's Report No. 11-704, February 2011.

- *The OAG agrees to add non- IT personnel salary as well as benefit costs for OAG personnel to the Quality Assurance Team monitoring report as prescribed by the Information Technology Detail instructions.   The OAG will begin reporting these costs in the fourth quarter of State Fiscal Year (SFY) 2011 and, at the same time, make a one- time adjustment to include the non-IT personnel and benefits costs from prior quarters.*

Implementation Date: September 30, 2011

Responsible Party: TXCSES 2.0 Initiative Tracking and Delivery Assurance Manager

- *The OAG agrees to use an industry standard methodology to assess project completion and use this methodology to report "Estimated Project Completion" in future Quality Assurance Team monitoring reports. OAG is currently working to implement a mechanism to track:*

  - *percentage complete using work effort, and*

  - *hours expended divided by total hours estimated to complete the work.*

  CSD will use this mechanism to report "Estimated Project Completion" in the Quality Assurance Team's SFY 2011 fourth quarter monitoring reports.

Implementation Date: September 30, 2011

Responsible Party: TXCSES 2.0 Initiative Tracking and Delivery Assurance Manager

Appendices

Objective, Scope, and Methodology

Objective

The objective of this audit was to determine whether the Office of Attorney General's (Office) development of the Texas Child Support Enforcement System 2.0 (TXCSES 2.0) initiative adheres to the Department of Information Resources' guidelines, the *State of Texas Contract Management Guide,* and other laws and best practices to help ensure that the project will be delivered on schedule, on budget, with an appropriate level of security, and with the agreed-upon level of user functionality.

Scope

The scope of this audit covered transactions and events related to the TXCSES 2.0 initiative that occurred between January 2007 and April 2011. Specifically, the audit scope included the Office's Child Support Division's (Division) processes, documentation, and financial information relating to the TXCSES 2.0 initiative; portions of the Division's business process redesign project; and the plans, methodologies, and other materials resulting from the business process redesign project that the Division is using to manage the development of the TXCSES 2.0 initiative.

Methodology

The audit methodology consisted of collecting information and documentation, performing selected tests and other procedures, analyzing and evaluating the results of the tests, and conducting interviews with management and staff at the Office.

To assess the reliability of the Office's TXCSES 2.0 initiative expenditure data from January 2, 2008, through January 12, 2011, auditors (1) reviewed existing documentation related to the data sources, (2) tested the data to identify obvious problems with completeness or accuracy, (3) interviewed knowledgeable agency officials about the data, (4) performed access control testing over the Office's purchase voucher generation system, and (5) relied on previous process and input control testing that the State Auditor's Office performed on the Office's accounting system during a previous audit.[4]

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[4] See *An Audit of Compliance with Historically Underutilized Business Requirements at Selected State Agencies and Higher Education Institutions* (State Auditor's Office Report No. 11-027, March 2011). Office management confirmed that the Office had not made any substantial changes to the controls since fieldwork for that audit in July 2010.

Auditors determined that the data was sufficiently reliable for the purposes of this report.

To assess the reliability of data from the Division's TXCSES 2.0 initiative project management scheduling system as of January 24, 2011, auditors (1) reviewed existing documentation related to the data sources, (2) interviewed knowledgeable Office employees about the data, (3) performed access control testing over the project management scheduling software program, (4) verified that the Office had adequate segregation of duties over the creation of source data, and (5) traced key elements of output reports to the project management scheduling software. Auditors determined the data was sufficiently reliable for the purposes of this report.

Information collected and reviewed included the following:

- The contract between the Office and the primary contractor for the initial business process redesign (methodology contractor), which was signed January 19, 2007.

- Subsequent amendments and renewals to the contract with the methodology contractor, including the first renewal effective September 1, 2007; the first amendment effective September 1, 2008; the second amendment effective September 1, 2009; and the third amendment effective September 1, 2010.

- The contract between the Office and the second primary contractor for the design, development, and implementation of the TXCSES 2.0 initiative (developer contractor), which was signed October 5, 2010.

- The high-level guide and attachments, which the Division calls the "playbook," that the Division is using to design and develop the TXCSES 2.0 initiative as of December 1, 2010.

- Project management plans for TXCSES 2.0 phase 1 projects.

- Quality Assurance Team quarterly monitoring reports from November 2009 through November 2010.

- The TXCSES 2.0 initiative annual advance planning document updates submitted to the U.S Department of Health and Human Services' Office of Child Support Enforcement (Office of Child Support Enforcement).

- The TXCSES 2.0 initiative's master work plan, including documentation related to the initiative's critical path.

- Resumes and job descriptions of key management employees and internal auditors at the Office, the methodology contractor, and the developer contractor.

- Project, portfolio, and initiative status reports, milestone reports, executive status reports, and contract status reports.

- The Office's identity access management policies and procedures.

- Office accounting expenditure data related to the TXCSES 2.0 initiative.

Procedures and tests conducted included the following:

- Interviewed key Office staff assigned to the TXCSES 2.0 initiative.

- Compared the TXCSES 2.0 initiative's project methodology, project management plans, and related monitoring tools and techniques to industry best practices.

- Reviewed and analyzed TXCSES 2.0 initiative expenditure data.

- Reviewed the TXCSES 2.0 initiative's master schedule, including the critical path.

- Reviewed current and planned child support enforcement business processes and security management.

- Tested acceptance of a deliverable against the deliverables review processes specified in the TXCSES 2.0 initiative's quality management plan.

- Compared expenditures for contract deliverables to the deliverables' price as listed in the relevant contract.

- Tested accuracy of the quarterly monitoring reports that the Division submitted to the Quality Assurance Team and traced financial data in those reports to the Office's financial records.

- Tested risk management matrices and procedures to determine whether risks were identified, assessed, and monitored as required by the TXCSES 2.0 initiative's delivery management plan.

- Evaluated the project plans for two TXCSES 2.0 projects to determine compliance with selected Capability Maturity Management Integration (CMMI) requirements.

- Compared the Office's communication-related documents for the TXCSES 2.0 initiative to best practices for a communications management plan documented in the Project Management Institute's *Project Management Body of Knowledge*.

- Reviewed the Office's Information Technology Detail, which the Office prepared as part of its Legislative Appropriations Request for the 2010-2011 biennium.

Criteria used included the following:

- State of Texas Contract Management Guide.

- Title 1, Texas Administrative Code, Chapter 202 (Information Security Standards).

- *Project Management of Body of Knowledge*, Project Management Institute, fourth edition.

- *Capability Maturity Management Integration*, Software Engineering Institute, Version 1.3.

- Control Objectives for Information and Related Technology (COBIT) 4.0, IT Governance Institute.

- *Security Considerations in the System Development Life Cycle,* National Institute of Standards and Technology, Special Publication #800-64, October 2008.

- Information Systems Audit and Control Association's glossary and requirements for Certified Information System Auditors.

- Department of Information Resources Texas Project Delivery Framework.

- Texas Government Code, Chapters 2054 and 2262.

- *Global Technology Audit Guide 12: Auditing IT Projects*, the Institute of Internal Auditors, March 2009.

- TXCSES 2.0 initiative's playbook and project management plans.

- U.S. Office of Child Support Enforcement guidance for independent verification and validation review reports.

Project Information

Audit fieldwork was conducted from February 2011 through April 2011. We conducted this performance audit in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Texas Government Code, Section 2054.158, names the State Auditor's Office as a participant on the State's Quality Assurance Team, which approves and monitors major information resource projects, including TXCSES 2.0. Generally accepted governmental auditing standards state that auditors do not impair their independence by providing technical advice based on their technical knowledge and expertise through means such as participating on activities, such as commissions, as experts in a purely advisory, nonvoting capacity. Auditors preserve their independence if the nature of the advice did not result in the auditors making management decisions or performing management functions. To provide advice to the Quality Assurance Team while retaining its independence, the State Auditor's Office has delegated voting authority for any Quality Assurance Team decisions related to the approval or disapproval of the expenditure of funds to the Legislative Budget Board since fiscal year 2005.
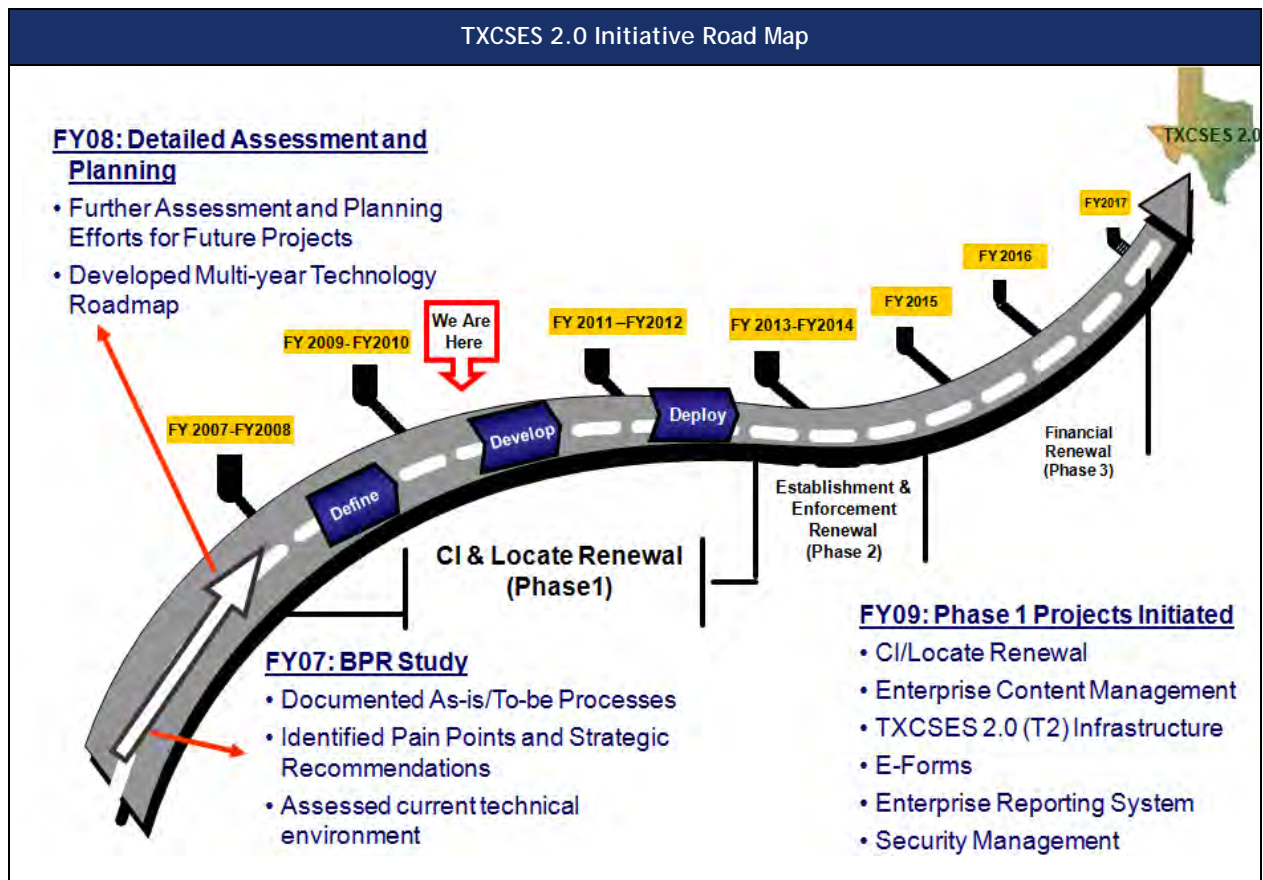
The following members of the State Auditor's staff performed the audit:

- Gregory Scott Adams, CPA, CGFM, MPA (Project Manager)

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- Priscilla G. Bauer

- Melissa Dozier

- Courtney Driskell

- Marlen Randy Kraemer, MBA, CGAP, CISA

- Michele Pheeney, CPA, MBA

- Parsons Townsend, CGAP

- Michael C. Apperley, CPA (Quality Control Reviewer)

- Michelle Ann Duncan Feller, CPA, CIA (Quality Control Reviewer)

- Ralph McClendon, CISSP, CCP, CISA (Audit Manager)

The Texas Child Support Enforcement System 2.0 (TXCSES 2.0) initiative is a large, multi-phase project. Figure 2 is the road map that the Office of the Attorney General's Child Support Division (Division) created to show the life cycle of the TXCSES 2.0 initiative. The dates depicted in the road map are the end dates for each stage of the project. For example, the "We Are Here" box indicates that, as of the time that the road map in Figure 2 was created, the initiative was in the fiscal year 2011-2012 biennium.

Figure 2

TXCSES 2.0 Initiative Road Map

FY08: Detailed Assessment and Planning
- Further Assessment and Planning Efforts for Future Projects
- Developed Multi-year Technology Roadmap

FY 2009-FY2010

We Are Here

FY 2011–FY2012

FY 2013-FY2014

FY 2015

FY 2016

FY2017

FY 2007-FY2008

Define

Develop

Deploy

Financial Renewal (Phase 3)

Establishment & Enforcement Renewal (Phase 2)

CI & Locate Renewal (Phase1)

FY07: BPR Study
- Documented As-is/To-be Processes
- Identified Pain Points and Strategic Recommendations
- Assessed current technical environment

FY09: Phase 1 Projects Initiated
- CI/Locate Renewal
- Enterprise Content Management
- TXCSES 2.0 (T2) Infrastructure
- E-Forms
- Enterprise Reporting System
- Security Management

Source: Figure created by the Division.

Table 2 lists the Division's estimates of the cost and completion date for each of the three phases of the TXCSES 2.0 initiative.

Table 2

Estimated Cost and Completion Date for TXCSES 2.0 Initiative's Phases As of March 2011		
Phase	Estimated Completion Date	Estimated Cost (In millions)
Phase 1 - Case Initiation and Locate Renewal	October 2013	$108.0
Phase 2 – Establishment and Enforcement Renewal	August 2015	54.5
Phase 3 – Financial Renewal	December 2017	40.2
TXCSES 2.0 Initiative – All Phases	December 2017	$202.7

Sources: The Division.

The Texas Child Support Enforcement System 2.0 (TXCSES 2.0) initiative is a large, multi-phase project, which the Office of the Attorney General's Child Support Division (Division) plans to complete in three phases.

Phase 1: Case Initiation and Locate Renewal

Phase 1 will redesign the Division's case initiation and locate business processes and is divided into five projects. Case initiation comprises all the activities related to the processing of applications and opening of cases. Locate includes all activities related to the search for absent parents whose addresses are unknown. This phase is designed to minimize or eliminate several manual processes.

The five projects in Phase 1 are:

TXCSES 2.0 Infrastructure – The TXCSES 2.0 initiative's infrastructure project is planned to establish the technical environment necessary to support the implementation of the TXCSES 2.0 initiative. This project consists of the evaluation, installation, and configuration of software and hardware products to build, host, and maintain the TXCSES 2.0 initiative's business processes.

Enterprise Content Management – This project is a portfolio[5] of smaller projects designed to reduce the Division's paper-based operations. The following four main projects comprise the enterprise content management portfolio:

- Taxonomy – The Division will create a logical structure to effectively manage virtual documents.

- Physical Case File Conversion – The Division will coordinate a vendor's efforts to convert existing paper files into virtual case file folders through manual scanning and indexing of these files.

- Virtual Case File – The Division will design processes to integrate new documents into electronic case files.

- Rendering Office of the Attorney General Documents and Easy Orders – The Division will replace two outdated applications with a legal document generation application. Additionally, this project will consolidate and standardize all legal content.

Enterprise Reporting System – During this project, the Division will consolidate child support data into a single repository. This data will be available to users

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[5] Portfolio as defined in the initiative's playbook glossary is a collection of projects that are deemed to be closely aligned and/or interdependent and are grouped together for the purposes of ongoing management of resources issues and risk.

in real time. Users will also be able to access some historical data to enable them to compare current performance to past performance. The Division will be able to use this comparative data to prepare state, federal, and agency reports.

Identity and Access Management – The Division will create one centralized security infrastructure to manage user identity and access management and create a single point of control for access to all Division applications and systems.

Data Quality Analysis and Cleanup – The Division will improve the quality of its data through a clean-up effort. The Division will also take steps to make changes to its systems and processes to prevent future data quality issues.

Phase 2: Establishment and Enforcement Renewal

The purpose of Phase 2 is to incrementally renew the business processes in the areas of establishment and enforcement. Establishment includes processes used to establish paternity or an obligation to provide financial and/or medical support for dependent children. Enforcement includes the judicial and administrative processes that are applied to a case to compel the non-custodial parent's compliance with his or her support orders. Phase 2 will be designed to make the Division more efficient by automating activities and implementing rules-based decision making to minimize manual intervention in routine aspects of case assessment.

Phase 3: Financial Renewal

The purpose of Phase 3 is to renew the Division's financial business processes related to the recording of transactions and activities related to the collection, distribution, and disbursement of child support payments. Phase 3 will be designed to allow easier modification of child support orders and to provide consolidated summaries of financial information on one screen for easy retrieval.

Related State Auditor's Office Work		
Number	Product Name	Release Date
10-034	An Audit Report on Selected Information Technology Projects at the Texas Medical Board, the Texas Alcoholic Beverage Commission, and the Texas Water Development Board	July 2010
04-024	An Audit Report on the Child Support Program at the Office of the Attorney General	March 2004

Copies of this report have been distributed to the following:

Legislative Audit Committee

The Honorable David Dewhurst, Lieutenant Governor, Joint Chair
The Honorable Joe Straus III, Speaker of the House, Joint Chair
The Honorable Steve Ogden, Senate Finance Committee
The Honorable Thomas "Tommy" Williams, Member, Texas Senate
The Honorable Jim Pitts, House Appropriations Committee
The Honorable Harvey Hilderbran, House Ways and Means Committee

Office of the Governor

The Honorable Rick Perry, Governor

Office of the Attorney General

The Honorable Greg Abbott, Attorney General