

To Whom it May Concern:

I am writing in response to the **Rule Change** proposed by the NM Department of Information Technology for Rule 1.12.9 NMAC, Project Certification of Technology Projects.

I currently hold the position of CIO for the NM Public Education Department. I previously held the role of CIO for the NM Environment Department. Collectively I have held the role of CIO for a NM executive agency for about 9 years. I have actively participated in several certified projects over the course of those years.

During that time I have come to understand the basis for the structure and requirements placed on certified projects. I understand that at the core of the process is managing risk and exercising fiscal responsibility to the citizens of NM who ultimately are the investors in the IT projects that are the subject of the certification process. With respect for all involved, I have often felt improvements to the project certification process and the respective certification requirements were needed and could be implemented while also managing project risk.

I respect and agree with the position that large, costly and technically complex IT Projects should be certified by Committee and be structured according to standard Project Management practices. I support the established project gates, the IV&V requirements (although I feel IV&V services should be funded by DoIT or another means rather than the project budget), the Technical Architecture review process and the monthly status reporting process. I do have some differing opinions on the content requirements for the various project artifacts, however, by and large I am in full support of the need for Project Certification by a Committee with the membership and voting criteria as described in the **Proposed Rule Change**.

I have for some time hoped for an amendment that would correct some flaws in the Original Rule. I have read the **Proposed Rule Change** and I have three recommendation to the Proposed Amended Rule:

1. The criteria for IT Project certification should be changed.
For example, the **Original Rule** recommends certification for IT projects that meet **one or more of the following (see 1.12.9.8)**:
 - (1) mission criticality;
 - (2) project cost equal to or exceeding \$1,000,000;
 - (3) impact to customer on-line access; or
 - (4) projects the committee deems appropriate.

The **Proposed Rule Change** requires certification of IT Projects that **meet one or more of the following criteria**:

- (1) the project is required to undergo phased certification under the respective appropriation or grant;
- (2) the project is a subsequent or interrelated project to a previously certified project;
- (3) the cost of the project is equal to or exceeding \$100,000; or
- (4) the project impacts customer on-line access.

I recommend the **Proposed Rule Change** to require certification of IT Projects where:

- (1) the original cost of the project is equal to or exceeds \$1,000,000 **AND one or more of the following**:

- (2) the project is required to undergo phased certification under the respective appropriation or grant;
 - (3) the project is a subsequent or interrelated project to a previously certified project;
 - (4) the project impacts customer on-line access.
2. The **Original Rule** allows for Office pre-certification (see 1.12.9.10, item E) should be reinstated or similarly reflected in the **Proposed Rule Change**. Pre-certification allows for the release of “phase zero” funds to the Agency to hire a contract PM who can then work on the certification documents to present to the committee for the Initial phase of the project. If the Initiation Phase is intended to be the Phase Zero referenced in the **Original Rule**, then the Initiation Phase should be an **Office certification** based on a submitted Project Certification Request Form **only** and not require a formal presentation to the PCC.
3. The definition for “Information Technology project” was changed in the **Proposed Rule Change** to “the development, **purchase**, replacement, or modification of a hardware or software system.” A purchase alone, which this definition implies, is not consistent with a project. A project includes services and processes often in conjunction with a hardware or software system purchase. I suggest removing the word “purchase” in the definition for “Information Technology project”.

Thank you for the opportunity to submit a written comment on the **Rule Change** proposed by the NM Department of Information Technology for Rule 1.12.9 NMAC, Project Certification of Technology Projects.

Best Regards,

Mary Montoya