Stage 1 Business Analysis

California Department of Technology, SIMM 19A.2 (Rev. 2.4), Revised 4/2/2018

1.1 General Information

Agency or State Entity Name:	State Water Resources Control Board
Organization Code:	3940
Proposal Name:	Division of Water Rights – Digital Transformation (DWR DIT)
Proposal Description:	Digital modernization of Water Rights permitting, enforcement, and data management processes including development of a geospatial database for managing and displaying water rights information (water use, place of use, place of diversion).
When do you want to start this project?:	7/1/2020
Department of Technology Project Number:	3940-104

1.2 Submittal Information

Contact Information:

Contact First Name	Contact Last Name
Cheryl	Holden
Contact Email	**Contact Phone Number**
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Submission Date:	7/1/2020
Version Number:	**1**

Project Approval Executive Transmittal

Attachment: Include the Project Approval Executive Transmittal as an attachment to your email submission.

1.3 Business Sponsorship

Executive Sponsors

Title	First Name	Last Name	Business Program Area
Deputy Director	Erik	Ekdahl	Executive Management

Select + to add additional Executive Sponsors

Business Owners

Title	First Name	Last Name	Business Program Area
Chief Deputy Director	Eric	Oppenheimer	Executive Management

Select + to add additional Business Owners

Program Background and Context

The Division of Water Rights (Division) is responsible for administering the state's water rights priority system, and for protecting public trust resources that include environmental flows, habitat, and species protection. The Division oversees water use permits for over forty thousand water users and is responsible for ensuring priority uses during times of shortage (drought curtailments). Typical functions of the Division include permit issuance and management, outreach, enforcement activities, and regulatory data management. The Division faced unprecedented challenges during the last drought. The Board's data system does not integrate water use data (water right holders currently report every year) with where the water is being used, when the water is being diverted, or where the water is being diverted from. As a result, the entire construct of the State's water rights system (protection of senior priority of right, protection of environmental and public trust resources) was challenged. The Board was unable to curtail potentially illegal diversions. The public and regulated entities could not access records or histories in their water right files, which are only kept as paper documents in Sacramento. The Division's data management system lacks modern Quality Control/Assurance (QA/QC) protocols, such that the data that is reported may be inaccurate by as much as 40 percent

in a given watershed. Since the drought, the Board has been given additional reporting authority that could allow for automatic uploads of telemetered water use data; however, the Division's data system is not prepared for this input, and cannot directly integrate real-time water use information in any fashion. The proposed project aims to do the following: develop a geospatially-based water rights management system that is used by internal regulators and the public; integrate water-use reporting data with geospatial information including point of diversion and place of use; build capacity to allow for modern measurement techniques to directly integrate into the Division's data system (telemetry, automatic uploads/reporting); and build in digitized records to the geospatial product so that water rights files are accessible to anyone, anywhere, electronically.

1.4 Stakeholders

Key Stakeholders		
Org. Name	Name	
State Water Resources Control Board	Division of Information Technology	
Internal or External?	☒ Internal ☐ External	
When is the Stakeholder impacted?		
Input to Business Process	During the Business Process	Output of the Business Process
☒	☒	☒
How are Stakeholders impacted?		
Lead technology support program for the Water Boards		
How will the Stakeholders participate in the project?		
Project management services, contract management services, infrastructure and solution management services. Responsible for ongoing maintenance and continual improvement.		
Org. Name	**Name**	
State Water Resources Control Board	Division of Water Rights	
Internal or External?	☒ Internal ☐ External	
When is the Stakeholder impacted?		
Input to Business Process	During the Business Process	Input to Business Process
☒	☒	☒
How are Stakeholders impacted?		
The Division is directly responsible for administering the state's water right system; will directly be responsible for a data management system associated with curating and displaying water right information.		
How will the Stakeholders participate in the project?		
Project management services, contract management services, infrastructure support, design, use cases, business needs, oversight, and troubleshooting. Responsible for ongoing maintenance and continual improvement, direct input from staff and stakeholders, recommends ongoing updates/maintenance, identifies needs and business requirements (with stakeholders, consultants, and DIT as needed).		
Org. Name	**Name**	
Public Water Agencies	Over 400 agencies statewide	
Internal or External?	☐ Internal ☒ External	
When is the Stakeholder impacted?		
Input to Business Process	During the Business Process	Output of the Business Process
☒	☒	☒

How are Stakeholders impacted?
Public water suppliers must apply to the Division to obtain new water rights, or to modify existing rights. The Division's existing data management system cannot accurately assess ongoing use or needs; as a result it can take decades to develop a new water right application. In addition, applicants cannot reliably assess on their own existing availability or permit conditioning in key watersheds. Those same water right holders must also report their use to the Division; that process is cumbersome and leads to numerous reporting violations, data errors, and quality control issues. The reliability of key stakeholder input, including accurate and reliable water use data, is a key component of developing a resilient water system for the state that can protect the public and the environment from future droughts and shortages.
How will the Stakeholders participate in the project?
Provide input on beta versions of new products; provide focus group input/wish list brainstorming early on. The Division has already participated in several scoping meetings with the University of California Berkeley, and is currently engaged in a pilot project with Los Angeles Department of Water and Power (LADWP) to scope costs, outcomes, and lessons learned from scanning and digitizing the paper water right files from two water right decisions in Mono Lake (the paper record on file from those two decisions include over 100 linear feet of paper documents in the Division's file room). The Division will continue to include this effort as part of the scoping process early in the planning stages of this project.
Select + to add additional Stakeholders

1.5 Business Program

Org. Name	Name
State Water Resources Control Board	Division of Water Rights

When is the unit impacted?		
Input to the Business Process	During the Business Process	Output of the Business Process
☒	☒	☒

How is the business program unit impacted?
Staff have difficulty administering permits, tracking enforcement cases, estimating and reporting water use, and resolving complaints without accurate data. Staff cannot use the current water use data submitted by water right holders due to data inaccuracies; as a result, staff cannot develop necessary models or evaluations in endangered species/ecosystems without years of processing and outsourcing to consulting modelers.
How will the business program participate in the project?
Division staff will provide program subject matter expertise during requirements gathering and solution development.
Select + to add additional Business Programs

1.6 Business Alignment

Business Driver(s)

Financial Benefit

Increased Revenue	Cost Savings	Cost Avoidance	Cost Recovery
☒	☒	☐	☒

Mandate(s)

State	Federal
☒	☐

Improvement

Better Services to Citizens	Efficiencies to Program Operations	Improved Health and/or Human Safety	Technology Refresh
☒	☒	☐	☒

Stage 1 Business Analysis

Security			
Improved Information Security	Improved Business Continuity	Improved Technology Recovery	Technology End of Life
☒	☒	☐	☒

Strategic Business Alignment	
Strategic Plan Last Updated?	None
Strategic Business Goal	Alignment
Goal 1 - Upgrade foundational data collection and reporting systems used to implement California water rights law, so that the state's water use data and information are timely and reliable in an open and transparent data setting. Meet the recommendations described in the Draft Water Resilience Portfolio (as required by Executive Order N-10-19).	Current Division data systems lack quality controls. Better data quality and improved water availability analysis capabilities. The Division estimates that the current level of accuracy of water diversion/use data is less than 60 percent, and as a result public water agencies, private diverters, Board staff, and other key stakeholders cannot use the state's own data to plan for future supplies or projects (including both water supply projects, habitat restoration, and salmon/Endangered Species protection). In addition, the water use information that the Division receives is sometimes reported as much as 18-24 months after the fact; following the 2012-2016 drought, the Board was given additional authorities to collect real-time (e.g., telemetered) water use data, but at present its existing data architecture and systems cannot support real time information collection, and cannot display the sources of real-time data. The passage of AB1755 (The Open and Transparent Water Data Act, 2016) requires the development of an integrated statewide water data platform and a strategic plan to guide program implementation. That strategic plan was released in April 2018. The Division has been working to make its existing data accessible and in an open format as required by AB1755; however, the data included in those reports is so poorly QA/QC'd that much of it is unusable without significant revision or scrutiny. The premise of AB1755 provides a set of goals for how our data should be managed and displayed; this project seeks to address key deficiencies in our data systems and collection to make them more compatible with the requirements of AB1755 over time, and to create data management protocols (and potentially systems/tools) that help save time and provide better information to the public. In addition, Governor Newsom issued Executive Order N-10-19 in April 2019, requiring the Natural Resources Agency, CalEPA, and California Department of Food and Agriculture to develop a report for ensuring water resilience in the face of climate change. The draft report was released on January 3, 2020, and contains numerous recommendations pertaining to updating/refreshing the state's Water Rights data management systems. Specifically, recommendation 22.7 states "explore ways to make water rights information easily available to the public by rebuilding the state's water right data base to include

	digital place of use, diversion, and case history information, made available on an easy-to-use geospatial platform."
Strategic Business Goal	Alignment
Goal 2 – Develop or convert the Division's existing water right/use data systems to a geospatial display and interface to improve the ability to access and display data from external water data collection and management systems.	Current Division systems and databases are not interoperable among themselves, nor with external systems or databases. Staff and the public cannot look on a map to identify water right points of diversion and link that to historical water use information/data. There is no publicly-accessible map for place of use. There is no way to look at complex legal and staff case histories without driving to Sacramento and looking at paper files in a single office building located downtown, which provides significant accessibility and equity concerns for key public information. A new data collection and management platform will allow API to API and other data transactions with external systems, improving the ability to analyze external data without downloading spreadsheets or clicking thorough numerous websites. Geospatial information will provide a more robust picture of the state's overall water use, and will provide options to both the regulator and the regulated entities for locally-derived management solutions (e.g., voluntary agreements) that preclude direct regulatory intervention by the state (e.g., fines, penalties, and curtailments). Also complies with the Draft Water Resilience report recommendation 22.7 to make the state's water rights information easier to use in a geospatial platform.
Strategic Business Goal	Alignment
Goal 3 - Improve end-to-end data processes including data collection, quality assurance, formatting, storage, and services (such as business analytics).	There is no current reference "data architecture" or data quality assurance policy/plan for the Division. A formal data architecture will ensure collected data are quality controlled upon submittal, properly formatted or re-formatted, stored according to record retention and cyber security rules, and are as useful as possible for business analysis, academic research, etc. A data architecture will also help the Division meet the requirements of AB1755, which will help ensure that the Division is implementing state law, providing open and transparent data, and setting up the correct data architecture for other entities and internal users to more quickly and efficiently make regulatory decisions. The Division anticipates focusing on this business goal prior to any significant additional work to provide key guidance and to help identify business requirements.
Strategic Business Goal	Alignment
Goal 4 - Facilitate water transfers	There is currently no statewide database of water transfers or real time water availability. We need to support an open ledger of water transfer and diversion volumes to support water markets and basin/watershed water balances. The Draft Water Resilience Portfolio includes several recommendations aimed at facilitating water transfers (Recommendations 21.1, 21.2, 21.3, and 21.4) that will be facilitated by technology advances and better data management processes at the Division.

Strategic Business Goal	Alignment
Goal 5 - Answer the following questions from the public: • Do I need a Water Right to take water? • What are my Water Rights reporting requirements and fees, and how can I comply? • Is there water available to take according to my water right?	The Division often receives public comment suggesting water rights compliance information is hard to find, is spread across multiple locations, or is missing spatial context (e.g. what is the water availability where I am). Developing appropriate data architectures and software solutions will empower analysis that answers public questions before directly contacting the Division. Will help reduce processing time for applications (currently, the average time to process a water right application exceeds five years; in some cases, the wait time currently exceeds 24 years). Integrated data will help applicants 1) use material generated by other diverters in their watershed, thereby saving time and costs; 2) allow easier watershed analysis by staff, and; 3) reduce permitting compliance timelines. Staff will also be able to better analyze permit term conditions and whether those terms are complied with.
Strategic Business Goal	Alignment
Goal 6 - Answer the following questions from Water Board staff: • What are the near real time water conditions to determine availability/compliance with rules? • Which reporters are not in compliance with Water Rights rules? • Where should outreach efforts be focused to improve enrollment?	Division staff spend as many as 10 to 20 Personnel Years (PYs) equivalents each year attempting to identify, track, notify, alert/remind, and enforce on water right holders that fail to file mandated reports (or that intentionally falsify those reports). Much of the workload is affected by 1) user-experience difficulties that lead to unintentional reporting errors; 2) user-experience difficulties in navigating the reporting system; 3) inability to quickly access reported data; 4) reporting data is currently tracked in a different relational database than core water rights data. A revised and integrated data management approach will free up staff to focus on other core Division needs such as compliance assurance and customer service.
Strategic Business Goal	Alignment
Goal 7 – Reduce Cost and Burden of Compliance	Reporters to the Division often must report the same information multiple times to meet compliance requirements due to outdated tools which lack full featured account management functionality. Reporters do not have useful web tools to help them find the information they may need to report, often resulting in wasted time searching for information across many different web sites. A modern web application can reduce the cost of compliance by storing redundant information such as name and address in an account so that reporters need to enter less information each time they report; while also providing the help text, hyperlinks, and infographics to relevant information to make sure the reporter has everything they need at the reporting interface.
Strategic Business Goal	Alignment
Goal 8 - Track outreach and other communication with water right holders.	Currently most physical mail correspondence, phone calls, emails, and other methods of communication are recorded in Microsoft Excel spreadsheets, making record recovery for PRAs, enforcement actions, or other case work difficult. Further, most mail issuance (mail-merge) is performed ad-hoc, by different

	staff in different units, resulting in redundant or misguided mailings, which can confuse the regulated population and cause loss of credibility of the Division. A digital content and records management framework can facilitate mail and correspondence tracking and reduce redundant contacts or other unnecessary embarrassments.

Select + to add additional Business Goals and Alignment

Executive Summary of the Business Problem or Opportunity

As the population grows, and climate change makes supply forecasting a challenge, it is more important than ever to ensure the state's water resources are ***accurately*** measured and managed in way that allows water users to understand when, where, and how much water is available to take. Similarly, the Division needs to understand when, where, and how much water is being taken to ensure resource sustainability and compliance with California law. In addition to knowing about the water, the Division also needs to be able to effectively manage the administrative aspects of water rights, from general mail and correspondence tracking to digitization of over 100 years of paper water rights so they can be analyzed within a geospatial platform.

Business Problem or Opportunity and Objectives Table

Problem ID	Problems/Opportunities
1	Geospatial information is often missing from current and historical water rights reporting data, or is inaccurate, making it difficult or impossible to associate a point of water diversion from a stream to the place (parcel, municipality, wildlife refuge, etc.) where the water is used. It is then difficult or impossible to tie reported volumetric use data to the known points of diversion, and the Division cannot easily manage the state's water right priority system or protect instream ecosystems (particularly during times of drought or other shortage). The lack of public accessibility prohibits user-generated voluntary agreements or other local solutions to address low flow, supply limitations, or other resource constraints.
Objective ID	1.1
Objectives	Develop a geospatial water rights data management system that integrates point of diversion, place of use, and reported volumetric data.
Metric	A map-driven user interface with integrated point of diversion, place of use, and volume data associated to parcels and other geospatial identifiers.
Baseline	Existing water rights data systems
Target	By 2024, replace existing legacy reporting software with GIS-centric web applications to collect and manage millions of water rights geodata points/polygons and associated regulatory reporting data.
Measurement Method	Number of new water rights available in geospatial system.
Select + to add additional Objectives	
2	Basic data collection quality assurance and control (QA/QC) protocols are missing, resulting in significant inaccuracy in reported water values such that the data cannot be used for planning, basin balancing/forecasting, or for general understanding (including for parties subject to a Voluntary Agreement or other quantitative rule). Lack of QA/QC leads to significant staff costs and time.
Objective ID	2.1
Objectives	Greater accuracy of reported data, better QA/QC protocols that reduce user error.
Metric	Accuracy of reported data
Baseline	40% of the currently reported data is inaccurate.
Target	By 2022, have a functioning reference data architecture and data quality control policy to ensure data are collected in useful and accurate ways.

Measurement Method	Evaluation of data accuracy, increase accuracy by 5 percent each year to reach an accuracy goal of 95% by 2030.
Select + to add additional Objectives	
2	See problem description 2 above
Objective ID	2.2
Objectives	Reduce staff time needed to revise, track, enforce, and verify reported data, and reduce staff time to outreach to reporters.
Metric	Number of enforcement actions for reporters, number of phone calls to staff.
Baseline	Staff currently spend 10-20 PY equivalents per year to identify missing reporters, and at least 20 PY equivalents per year attempting to clean up or QA/QC data for purposes of modeling and water availability determinations.
Target	By 2022, have a functioning reference data architecture and data quality control policy to ensure data are collected in useful and accurate ways.
Measurement Method	Evaluation of data accuracy, increase accuracy by 5 percent each year to reach an accuracy goal of 95% by 2030.
Select + to add additional Objectives	
3	More easily accessible data and information regarding demand, place of use information, and previous transfer conditions will help right holders expedite water sales and transfers in the future. Such information will be critical if the Division wishes to approve conservation-based transfers, as allowed under Water Code section 1211. Demand for water has increased with population growth since water rights were established in 1914, while supply is becoming increasingly uncertain due to climate change, further complicating water availability analysis and forecasting. Climate change projections indicate greater flood frequency, punctuated by longer, more severe drought. The Administration released a draft Water Resilience Portfolio report on January 3, 2020, which directs state agencies (including the Division) to prepare for water uncertainty and develop procedures that ensure long-term water resilience. One key climate change adaptation strategy is to capture high-volume flood events and store that water in underground aquifers, where it can be used during later shortages. The draft Water Resilience Portfolio also called for state agencies to identify mechanisms to ease and expedite water transfers. Water transfers will be critical for implementation of the Sustainable Groundwater Management Act (SGMA), and for ensuring environmental and human health safety during droughts.
Objective ID	3.1
Objectives	Provide platform or structure for stakeholders to identify, track, and review water transfers.
Metric	Number of transfers in the system, volume of water per transfer, locations.
Baseline	None, water ledgers do not exist.
Target	By 2025, have a public-facing ledger and map of water rights and transfers to support water markets and improve strategic water management.
Measurement Method	Number of transfers available on system.
Select + to add additional Objectives	

4	Digitize paper water right records so they can be displayed in a publicly available geospatial platform. Currently the point of diversion and place of use information is only available to members of the public who travel to view the paper files at the Division's Sacramento headquarters. Digital information will be helpful and useful to other water right holders or applicants in a watershed, as well as to other stakeholders interested in evaluating whether a water right holder is complying with a right's terms and conditions.
Objective ID	4.1
Objectives	Digitize paper water right records and attach to geospatial information such as point of diversion and/or place of use.
Metric	Availability of digitized paper water right records
Baseline	None are currently digitized and available within a publicly available geospatial platform.
Target	95 percent digitization within 5 years of implementation.
Measurement Method	Track the number of digitized records available on the geospatial platform.
Select + to add additional Objectives	
Select + to add additional Problems	

Project Approval Lifecycle Completion and Project Execution Capacity Assessment

1. Does the proposal development or project execution anticipate sharing resources (state staff, vendors, consultants or financial) with other priorities within the Agency/state entity (projects, PALs, or programmatic/technology workload)?

(•) Yes ( ) No ( ) Clear

2. Does the Agency/ state entity anticipate this proposal will result in the creation of new business processes or changes to existing business processes?

( ) No ( ) New Processes ( ) Existing Processes (•) Both New and Existing ( ) Clear

1.7 Project Management

Project Management Risk Score:	1.8
Attach completed Statewide Information Management Manual (SIMM) Section 45 Appendix A:	Include the completed SIMM 45 Appendix A as an attachment to your email submission.

Existing Data Governance and Data

1. Does the Agency/state entity have an established data governance body with well-defined roles and responsibilities to support data governance activities? If an existing data governance org chart is used, please attach.	( ) Unknown ( ) Yes (•) No ( ) Clear	If applicable, include the data governance org chart as an attachment to your email submission.
2. Does the Agency/state entity have data governance policies (data policies, data standards, etc.) formally defined, documented, and implemented? If yes, please attach the existing data governance plan, policies or IT standards used.	( ) Unknown ( ) Yes (•) No ( ) Clear	If applicable, include the data governance policies as an attachment to your email submission.

3. Does the Agency/state entity have data security policies, standards, controls, and procedures formally defined, documented, and implemented? If yes, please attach the existing documented security policies, standards, and controls used.	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the documented security policies, standards, and controls as an attachment to your email submission.
4. Does the Agency/state entity have user accessibility policies, standards, controls, and procedures formally defined, documented, and implemented? If yes, please attach the existing documented policies, accessibility governance plan, and standards used, or provide additional information below.	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the documented accessibility policies, standards, and controls as an attachment to your email submission.
5. Do you have existing data that you are going to want to access in your new solution?	○ Unknown ◉ Yes ○ No ○ Clear	If applicable, include the data migration plan as an attachment to your email submission.
6. If data migration is required, please rate the quality of the data.	Significant issues identified with the existing data	

1.8 Criticality Assessment

Business Criticality

Legislative Mandates:	N/A ☒	
Bill Number(s)/Code(s):		
Language that includes system relevant requirements:		
Business Complexity Score	2.3	Include the completed SIMM 45 Appendix C as an attachment to your email submission.

Noncompliance Issues

Indicate if your current operations include noncompliance issues and provide a narrative explaining the how the business process is noncompliant.

Programmatic Regulations	HIPPA/CJIS/FTI/PII/PCI	Security	ADA	Other	N/A
☐	☐	☐	☐	☐	☐

1. What is the proposed project start date?	7/1/2020
2. Is this proposal anticipated to have high public visibility?	◉ Yes ○ No ○ Clear

If "Yes," please identify the dynamics of the anticipated high visibility below:

Most large volume water users will use the solutions (>50,000 individuals)

3. If there is an existing Privacy Information Assessment, include as an attachment to your email submission.

4. Does this proposal affect business program staff located in multiple geographic locations?	○ Yes ◉ No ○ Clear

If "Yes," provide an overview of the geographic dynamics below and enter the specific information in the space provided.

City	State	Number of Locations	Approximate Number of Staff

Select + to add Locations

1.9 Funding

1. Does the Agency/state entity anticipate requesting additional resources through a budget action to complete the project approval lifecycle?	◉ Yes ○ No ○ Clear
2. Will the state possibly incur a financial sanction or penalty if this proposal is not implemented? If yes, please identify the financial impact to the state below:	○ Yes ◉ No ○ Clear
3. Has the funding source(s) been identified for this proposal?	◉ Yes ○ No ○ Clear

FUNDING SOURCE		FUND AVAILABILITY DATE
General Fund	☒	7/1/2020
Special Fund	☐	Date Picker
Federal Fund	☐	Date Picker
Reimbursement	☐	Date Picker
Bond Fund	☐	Date Picker
Other Fund	☐	Date Picker
If "Other Fund" is checked, specify the funding:		

1.10 Reportability Assessment

1. Does the Agency/state entity's IT activity meet the definition of an IT Project found in the State administrative Manual (SAM) Section 4819.2? If "No," this initiative is not an IT project and is not required to complete the Project Approval Lifecycle.	◉ Yes ○ No ○ Clear
2. Does the activity meet the definition of Maintenance or Operations found in SAM Section 4819.2? If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report. And provide an explanation below.	○ Yes ◉ No ○ Clear
3. Has the project/effort been previously approved and considered an ongoing IT activity identified in SAM Section 4819.2, 4819.40? If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.	○ Yes ◉ No ○ Clear

4. Is the project directly associated with any of the following as defined by SAM Section 4812.32? Single-function process-control systems; analog data collection devices, or telemetry systems; telecommunications equipment used exclusively for voice communications; Voice Over Internet Protocol (VOIP) phone systems; acquisition of printers, scanners and copiers. If "Yes," this initiative is not required to complete the Project Approval Lifecycle. Please report this workload on the Agency Portfolio Report.	○ Yes ◉ No ○ Clear
5. Is the primary objective of the project to acquire desktop and mobile computing commodities as defined by SAM Section 4819.34, 4989? If "Yes," this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity. Submit a copy of the completed, approved Stage 1 Business Analysis to the CDT and track the initiative on the Agency Portfolio Report.	○ Yes ◉ No ○ Clear
6. Does the project meet all of the criteria for Commercial-off-the-Shelf (COTS) Software and Cloud Software-as-a-Services (SaaS) delegation as defined in SAM 4819.34, 4989.2 and SIMM 22 If "Yes," this initiative is a non-reportable project. Approval of the Project Approval Lifecycle is delegated to the head of the state entity; however, submit an approved SIMM Section 22 form to CDT.	○ Yes ◉ No ○ Clear
7. Will the project require a Budget Action to be completed?	◉ Yes ○ No ○ Clear
8. Is it anticipated that the project will exceed the delegated cost threshold assigned by CDT as identified in SIMM 10?	◉ Yes ○ No ○ Clear
9. Are there any previously imposed conditions place on the state entity or this project by the CDT (e.g., Corrective Action Plan)? If "Yes," provide the details regarding the conditions below.	○ Yes ◉ No ○ Clear
10. Is the system specifically mandated by legislation?	○ Yes ◉ No ○ Clear

Department of Technology Use Only

Original "New Submission" Date	2/24/2020	
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Form Accepted Date	2/24/2020	
Form Status	Completed	
Form Status Date	2/24/2020	
Form Disposition	Approved	If "Other," specify:
Form Disposition Date	2/24/2020	