

**Department of Indian Affairs and Northern Development
Corporate Services
Departmental Audit and Evaluation Branch**

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**Pre-Implementation Audit
of PeopleSoft**

**Project 95/02
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Executive Summary

Between October 1995 and March 1997, the Departmental Audit and Evaluation Branch (DAEB) conducted a pre-implementation audit of the PeopleSoft Human Resources Management System (PS/HRMS). This system is an off-the-shelf integrated suite of Human Resource software applications from PeopleSoft Inc. It replaces the previous Human Resources Information System (HRIS) implemented in 1987.

Sierra Systems Consultants Inc. assisted the Department of Indian Affairs and Northern Development (DIAND) in the implementation of the PS/HRMS. The firm presented their project plan on March 29, 1995, and proposed May 21, 1996, as the target production date of the system. Senior departmental management decided that the implementation of PS/HRMS would be scheduled for November 1996 in order to ensure a more complete application (i.e. Version 5). The original total estimated cost for implementing PS/HRMS was calculated as \$1,133,500. The primary clients are the Human Resources Branch and the individual Responsibility Centre Managers.

Objectives and Scope

The objectives of the audit were to examine the deliverables i.e. products of the system's implementation (such as documents, screens etc.). The audit was required to assess the system's integrity controls specific to DIAND, the procedures for retention of records and conformity to user's requirements.

The scope covered headquarters. It included the review of the PS/HRMS implementation deliverables related to key elements such as security, training, data conversion and elements related to the development and design of the system and its direct costs. From the review of the deliverables we were able to assess the adequacy of the PS/HRMS controls, procedures and users' requirements.

Approach

The audit team reviewed the system's implementation through a concurrent approach. They assessed the PS/HRMS implementation deliverables as identified in the original project plan produced by the PS/HRMS project team. However, to ensure objectivity, the audit team did not participate in any of the implementation project activities. After reviewing each deliverable, the audit team discussed their observations and findings with the PS/HRMS project managers. This was done to obtain clarification on elements of concerns; also to give the PS/HRMS project managers early information of any need to build or improve upon the controls in the system.

General Assessment

Based on the deliverables we examined, the PS/HRMS has been implemented adequately, within the original estimated cost and within an acceptable time frame. The security and reporting aspects of PS/HRMS which still need to be strengthened are currently being looked at. It is also important to mention that the implementation of the PS/HRMS was not an easy project to carry out and manage considering its new technology, complexity and limited resources.

Key observations

The PS/HRMS project team has ensured a smooth and orderly implementation of the PS/HRMS.

The mix of the PS/HRMS project team consisting of representatives from Human Resources Branch, Information Systems, and Information Infrastructure directorates provided the project with expertise in the disciplines required for a proper implementation.

Communication within headquarters and with the regions was occurring on a regular basis. The following items reflect some of the mechanisms used to communicate information on the PS/HRMS project:

- PeopleSoft newsletter every 2 to 3 weeks;
- an electronic bulletin board established by the Human Resources Branch;
- a PeopleSoft mailbox to receive and respond to any questions, concerns, ideas; and
- weekly meetings to exchange information and respond to concerns, issues.

The implemented system conforms to users' requirements and there is auditability to meet the requirements of DAEB for post-implementation audit.

There are adequate controls to ensure the completeness and accuracy of data. However, authorized users of PS/HRMS have the capability to send PS/HRMS reports through E-mail to unauthorized individuals. This is not unique to the PS/HRMS as this capability is available in any system whose users have access to the E-mail.

Background

Between October 1995 and March 1997, the Departmental Audit and Evaluation Branch (DAEB) conducted a pre-implementation audit of the PeopleSoft Human Resources Management System (PS/HRMS). This system is an off-the-shelf integrated suite of Human Resource software applications from PeopleSoft Inc. It has recently been implemented in the Department of Indian Affairs and Northern Development (DIAND) to replace the previous Human Resources Information System (HRIS) implemented in 1987. It incorporates the modifications made by PeopleSoft Inc. to meet Government of Canada (GOC)'s legislative and other requirements.

In September 1994, the Treasury Board Secretariat (TBS) awarded a contract to PeopleSoft Inc. for a bilingual version of PeopleSoft HRMS. This agreement illustrates the government/private sector partnership and shared systems initiatives recommended in the TBS's "Blueprint for Renewing Government Services Using Information Technology". DIAND decided, with some 17 other government departments, to sign on to share PeopleSoft. A users' group (cluster group) representing these departments was established to ensure adherence to a core system for the Government of Canada.

Each user department (including DIAND) is committed to this core version, with minor modifications necessitated by its circumstances and applicable legislation.

Sierra Systems Consultants Inc. assisted DIAND in the implementation of the PS/HRMS. The firm presented their project plan on March 29, 1995, and proposed May 21, 1996, as the target production date of the system. Senior departmental management decided that implementation would be scheduled for November 1996 in order to ensure a more complete application (i.e. Version 5). The original total estimated cost for implementing PS/HRMS was calculated as \$1,133,500. The primary clients are the Human Resources Branch and the individual Responsibility Centre Managers.

Objectives

The audit objectives were to:

- examine the system's implementation project deliverables at key control points, and/or on the completion of critical sub-tasks in the implementation process. The examination activities concentrated on key elements such as testing, conversion, security, interfaces, key controls, identification of DIAND user requirements, training and related plans, computing environment and implementation project management;

- assess the controls specific to DIAND for PS/HRMS to ensure completeness, accuracy, validity and integrity of data and of system information, and proper authorization of transactions. This includes manual, clerical and supervisory controls, management procedures for ensuring the continued operation of the system and its basic controls over inputs, outputs and processing of data;
- assess the adequacy of any procedures, designed and developed for retention of records and transaction trails; and
- verify that the system implemented conforms to the users' requirements and that there is auditability to meet the requirements of the Departmental Audit and Evaluation Branch (DAEB) for post-implementation audit.

Scope

The scope of the audit covered headquarters. It included PS/HRMS implementation deliverables, training, users' requirements and other records connected with the development and design of the system and its direct costs before being ready for implementation. DAEB scoped out system documentation since the documentation produced by PeopleSoft Inc. is distributed throughout the world and is being used by many large PeopleSoft clients.

Methodology

The audit team reviewed the system's implementation through a concurrent approach. They assessed the implementation deliverables as identified in the original project plan produced by the PS/HRMS project team. However, to ensure objectivity, the audit team did not participate in any of the implementation project activities. After reviewing each deliverable, the audit team discussed their observations and findings with the PS/HRMS project managers. This was done to obtain clarification on elements of concerns; also to give the project managers early information of any need to build or improve upon the controls in the system.

The observations were then finalized and communicated to the PS/HRMS project team and the Project Review Committee (PRC) members. This allowed for the PS/HRMS project team to immediately implement corrective measures, if necessary, rather than wait until the end of the audit.

The PS/HRMS project was originally divided into 9 major stages. Each stage consisted of tasks along with deliverables to be produced and approved by the PRC. These stages, as reflected in the original plan, were as follows:

Project Initiation Stage :

Covered all the activities involved in preparing and initiating the project.

Technical Architecture Stage:

Covered all the activities involved in the technical planning to implement PS/HRMS in order to replace HRIS. It included setting up the central environment to be used to run PS/HRMS while the system was prepared for production.

Information Review Stage:

These activities involved the technical and business planning and preparation to address the information management issues.

Business Review and Preparation Stage:

These activities involved the redesigning of HR processes and the preparation of User training requirements.

HR System/Process Preparation Stage:

Prepared PS/HRMS and the associated redesigned HR processes for implementation.

Implement Production Architecture Stage:

Covered the implementation of all of the information technology components required for all users to access and use PS/HRMS when it is in full production.

Prepare HR Data and Conversion Stage:

This stage was responsible for correcting existing HR data in order to allow importing into PS/HRMS and commissioning the data conversion capability of the project.

Implement Users Stage:

Involved the implementation of the PS/HRMS as a production system.

PS/HRMS Production Stage:

This final stage covered the post-system implementation of PS/HRMS as a production system.

Based on the original plan, a task list, referred to as the timeline plan, was further developed and periodically updated throughout the PS/HRMS project. It was used as the “blueprint”, outlining all tasks to be performed along with the person responsible and time frame.

Continuity

We must emphasize that all the hard work completed by the implementation of PS/HRMS must not be lost after full implementation. To maintain the same level of service to the clients of PS/HRMS, the following activities must be pursued:

- assurance of maintaining adequate level of security and of access controls;
- normal maintenance to provide upgrades;
- analysis and implementation of management reports ensuring these meet the users' requirements;
- implementation of any new modules; and
- implementation of any new legislative changes.

It is also important that DIAND continue to provide the resources necessary to maintain and to monitor the performance of such a key system. Without the devoted resources to keep the system up-to-date, DIAND will risk losing the confidence of PS/HRMS clients and therefore, potentially, the use of PS/HRMS.

Section 2 - Detailed Observations

The observations which follow provide a “time stamp” assessment of each deliverable we reviewed. Therefore, they were assessed as they were produced during the project and the observations reflect that precise period.

Information Architecture

DIAND was the first government department to benchmark its information architecture. The PS/HRMS “benchmark” consisted of a full analysis on the impact of a central database architecture in DIAND. The deliverables indicated that PS/HRMS doesn’t impede the performance of other DIAND systems. However, the network analysts were not clear as to the actual impact of PS/HRMS on INACnet (the DIAND Wide Area Network covering the country). DIAND was in the process of acquiring additional monitoring software to perform more monitoring of the PS/HRMS application.

Data Conversion, Data Quality

The process of converting the data from the old system to the new one was under control and the data quality procedures were adequate. The procedures to assess quality of HRMS data were designed during a 1-day workshop held by the Data Quality Section of Information Management Branch (IMB).

Data Purification

The procedures regarding the validation of the HRIS data were adequate. Each Human Resources Manager identified authoritative source documents for each data element in her/his domain. All data was selected by Planning and Systems Division and each Human Resource Manager was responsible for comparing the data (from HRIS) with authoritative source documents kept on file for employees. The information from HRIS was found to be accurate as compared to the authoritative source documents.

Data Mapping

The procedures of mapping the data from both systems (HRIS and PS/HRMS) were adequate although the manual processes that were planned to be reviewed are not listed in the Information Architecture report. The Government of Canada version of PS/HRMS was unavailable when the data mapping was completed and therefore some information did not exist. The data mapping was only performed for current data in the previous Human Resources Information System (HRIS) and required PS/HRMS data elements for those modules to be implemented. The mapping was continuously updated.

Support Strategy

An effective support strategy should clarify roles and responsibilities to ensure that the users can get their issues resolved quickly. The management roles and responsibilities for supporting the users were not defined as part of the support strategy. The PS/HRMS project team took action and provided the Help Desk with appropriate information to support PS/HRMS. Resources from the Help Desk were specifically assigned to PS/HRMS and a support structure was implemented to include regional staff. The “Support Magic” software, to be used to register the technical requests, was not yet in place to handle PeopleSoft and therefore a manual support log has been maintained.

The support strategy did not define which word processing software would be used to produce letters. WordPerfect being the departmental standard, it was selected rather than the PS/HRMS supported MSWord. However, the cost of supporting WordPerfect macros was not discussed.

Although a formal Security Plan was not produced for the implementation of PS/HRMS, general security administration was addressed in the Support Strategy. It identified the use of the PeopleSoft application tools. In addition, The Rollout Strategy, a document describing how the PS/HRMS application will be moved into production, identified the need to define the basis of the security service.

During the implementation process several suggestions were made by the regions. As an example, they expressed their concerns regarding the number of (human resource business) changes to coding structures and practices that should be considered during the project. The Support Strategy noted that these suggestions would be addressed through the Business Fit Analysis and would result in a re-engineering of the HR processes. However the Support Strategy does not provide a detailed list of the suggestions, nor is there a cross reference with the Business Fit Analysis to ensure the suggestions were addressed.

The Post-Implementation Audit of the PS/HRMS, to be conducted at a later date, should include an analysis to ensure that the regional suggestions were addressed appropriately, are documented and cross referenced to the Business Fit Analysis. This will provide additional assurance that user requirements/concerns are incorporated in the PS/HRMS.

The support strategy documented a number of key issues concerning items like software distribution, training, desktop support, regional variance, change control procedures, and centralized government support. However, neither the Support Strategy nor the PS/HRMS project team kept an “Issues Inventory” identifying responsibility for each issue and a target resolution date. When this was brought to their attention, the PS/HRMS project team produced a “Pilot Issue / Problem Log document” that was used throughout the Pilot Testing phase. For future development project, the inventory of issues should be initiated at the start of the project.

Rollout Strategy

The Rollout Strategy consisted of a plan describing how the PS/HRMS application will be implemented throughout the country. There was no discussion in the Rollout Strategy of a contingency plan in case PS/HRMS did not work (fall back plan) when implemented. The strategy assumed that in the event of a significant failure the only fall back plan would be to delay implementation. We were verbally notified that the decommissioning of existing HRIS would occur by deactivating all passwords. The HRIS database and application would continue to reside on the system but be inaccessible. If a significant failure occurred with PS/HRMS then the HRIS passwords would be reactivated so HRIS would continue to be used until problems with PS/HRMS were corrected.

The Rollout Strategy highlighted several issues reported by the regions. Among these were improving communication, unique requirements of the northern regions, unreliable telecommunication links in Sioux Lookout, and impact analysis. These issues were not documented and the Rollout Strategy deliverable did not provide a formal response, but they were discussed and resolved at various team meetings. A series of E-mails logged the problem resolution.

In addition, the regions raised the issues dealing with the Wide Area Network (WAN) and how it has not been responsive in the past. They feel that with an increased load on the WAN there will be serious impact on response times. Neither the Rollout Strategy nor any other document describes how the WAN will be monitored. There is also no description of performance thresholds or documentation describing how the Information Infrastructure Directorate (IID) will deal with traffic bottlenecks. **A Post-Implementation Audit will need to review this important matter.**

Although the Rollout Strategy identified that “reporting requirements” plan would be developed in March 1996, we have seen no evidence that this plan has been created. This exposes DIAND to the risk of inadequate reporting. As of March 1997, some standard reports are being generated by PS/HRMS and a series of reports are currently being developed as per user requirements.

Recommendation 1: The Director General, Human Resources, should ensure that the requirements for PS/HRMS reports are identified.

Recommendation 2: The Director General, Information Management, should ensure that the reports, identified as needed by users of the system, are developed.

The Rollout Strategy also describes the activities to be performed when conducting the pilot tests in the regions. The pilot tests were successful, and the clients were pleased. However, there were no documented terms of reference or Memorandum of Understanding to define the detail tasks, responsibilities, target dates or costs for the pilot tests. This exposes DIAND to the risk of misunderstandings between pilot test participants, and the possibility that certain tasks may not have been completed during the pilot testing. In future, when conducting a pilot test, DIAND should include appropriate terms of reference and Memorandum of Understanding between all concerned parties.

Regarding the impact analysis, it addresses areas like workstation configuration standards, setup scripts, and impact of growing INTERNET traffic on the WAN. IID was tasked to outline their efforts to rationalize network design, prepare a position on LAN standards and support, put network monitoring tools in place and prepare a test plan for the PS/HRMS application. A “fall-back” plan, for office access where low speed links were in place, was also to be produced. We have seen no evidence of documents supporting these activities or their status. Therefore these offices with low speed links may be exposed to undue delay when requiring service because roles and responsibilities are not clear, and sources of services/supplies are not clear.

The Post-Implementation Audit of the PS/HRMS, to be conducted at a later date, should include a review of the network monitoring tools put in place to monitor network traffic and the actions incurred to rationalize the network.

Security

DIAND is presently placing reliance on the PS/HRMS’s security features without having their own security plan. The PS/HRMS project managers are planning to develop one in the upcoming year.

DIAND conducted a Threat and Risk Assessment (TRA) of PS/HRMS and the report was published in September 1996. The TRA identified thirty six recommendations from which thirty two have been implemented.

The Post-Implementation Audit of the PS/HRMS, to be conducted at a later date, should include an assessment of the impact on DIAND for excluding some recommendations. It should specifically assess:

- **whether changed data can be adequately identified;**
- **the adequacy of identification and reporting of all unauthorized log-in attempts;**
- **whether ad-hoc reports containing confidential data are secured; and**
- **the effectiveness of using password protected screen savers and the PS/HRMS time-out feature.**

DIAND is currently investigating the use and implementation of the PS/HRMS audit trail. Without this audit trail in place, DIAND is exposed to the risk of not having adequate knowledge on database changes or unauthorized log-in attempts.

PS/HRMS uses an Oracle database. Normally, an Oracle database is accessible to anyone who is knowledgeable in Special Query Language (SQL) even from outside the PS/HRMS application. However, PS/HRMS is delivered with a control feature to restrict access to the PS/HRMS Oracle database.

The implemented security features restrict the users in a region from accessing data of another region. Consequently, this level of security does not provide for the transfer of staff between regions or areas of responsibility. DIAND is currently investigating this issue and is considering the option of providing a “view only” option allowing employees to view information from different regions or responsibility centres.

Currently, the managers of human resources in each region have complete access (read, write, view, etc) for the entire database. This allows them to process transfers but also exposes DIAND to the risk of unauthorized changes to the database.

DIAND is currently in the process of changing the security from a regional based security to a responsibility based security.

The Post-Implementation Audit of the PS/HRMS, to be conducted at a later date, should include an assessment of the controls concerning access of data between regions.

There is no automated process within PS/HRMS for changing initial passwords or for changing passwords after a specified period of time. A compensating control for this is the double sign-on required to gain access to PS/HRMS. A user must first sign onto the Local Area Network (LAN) and then must sign on to PS/HRMS. Therefore, each authorized user must have two passwords. In addition, the password for the LAN does expire after a specified period of time.

Authorized DIAND staff will be able to print PS/HRMS reports to specific printers or to a file. If a report is printed to a file then it can be attached to internal as well as Internet E-mail. This scenario is also true for using the Crystal Reporting mechanism. Query access will shortly be provided to all staff in the regions. Although preprogrammed reports indicate "Personal and Confidential" on the heading of each page DIAND is still exposed to the risk of having confidential information sent to unauthorized individuals. This is not unique to the PS/HRMS as this capability is available in any systems whose users have access to the E-mail.

Any contractor working on PS/HRMS is pre-screened to the appropriate security clearance level. If a contractor is required to view production data then that data is viewed on the workstation of an appropriate HR employee. The PS/HRMS team is continuously monitoring to improve application security.

Recommendation 3: The Director General, Information Management, should ensure that E-mail policies are looked at to ensure the confidentiality of the PS/HRMS reports or files sent through E-mail is maintained.

Costs

The PS/HRMS project has been carried out within the original estimated cost including a provision for hardware. Since PS/HRMS was implemented on hardware which is also used for other purposes (eg. LAN servers), a portion of the hardware cost has not been allocated to PS/HRMS but to "common services".

Post-Implementation Audit

As mentioned throughout the report, specific activities related to the PS/HRMS needed further analysis to ensure continuity and adequacy of the application. This should be done through a Post-Implementation Audit.

Terms of Reference

DEPARTMENTAL AUDIT AND EVALUATION BRANCH**TERMS OF REFERENCE 1995-1996****PRE-IMPLEMENTATION AUDIT OF PEOPLESOFT**

PURPOSE

To assess the adequacy of the various controls in the implementation of the PeopleSoft Human Resource Management System (PS/HRMS). The system is presently being implemented by the Department of Indian Affairs and Northern Development (DIAND); therefore, a System Under Development (SUD) audit with a concurrent approach is required.

The SUD audit and concurrent approach are intended to serve as one of several control tools to be used by management to assist them in ensuring that the system ultimately implemented will prove to be effective in meeting the information needs of its users, efficient and economical to operate. In essence, it is an evaluation of the methodology used to determine the business requirements as well as the implementation process. It will ensure that corrective measures are considered before significant investments are made.

BACKGROUND

In September 1994, the Treasury Board Secretariat (TBS) awarded a contract to PeopleSoft Inc. for a government-wide licence for the bilingual version of PeopleSoft HRMS, an integrated suite of human resource management applications. This agreement was an example of the kind of government/private sector partnership and shared systems initiatives recommended in the Blueprint for Renewing Government Services Using Information technology. DIAND decided, with some 14 other government departments, to sign on to share PeopleSoft. It will replace the existing Human Resources Information System implemented in 1987. There is a users' group (cluster group) made up of the representatives of these departments to ensure adherence to a core system for the Government of Canada.

PS/HRMS is an off-the-shelf world-wide product that has been modified by PeopleSoft Canada to incorporate the data elements and HRMS functionalities (government legislative requirements) which are not present in the commercial PeopleSoft product. Each user department (including DIAND) is committed to a core version of the application while potentially making minor modifications necessitated by their circumstances and applicable legislation.

Sierra Systems Consultants Inc. is presently assisting DIAND in the implementation of the PS/HRMS. The firm presented their project plan on March 29, 1995, and proposed May 21, 1996, as the target production date of the system.

AUDIT OBJECTIVES

The audit objectives are to:

- examine the system's deliverables at key control points, and/or on the completion of critical sub-tasks in the implementation process. The examination activities will concentrate, at a minimum, on the following elements:
 - Testing
 - Conversion
 - Security
 - Interfaces
 - Key Controls
 - Identification of DIAND user requirements
 - Training and related plans
 - Computing Environment
 - Implementation Project Management;
- assess the controls specific to DIAND for PS/HRMS to ensure completeness, accuracy, validity and integrity of data and of system information, and proper authorization of transactions. This includes manual, clerical and supervisory controls, management procedures for ensuring the continued operation of the system and its basic controls over inputs, outputs and processing of data;
- assess the adequacy of any procedures, designed and developed for retention of records and transaction trails; and
- verify that the system implemented conforms to the users' requirements and that there is auditability to meet the requirements of the Departmental Audit and Evaluation Branch (DAEB) for post-implementation audit.

SCOPE

The scope of the audit covers headquarters. It includes all system documentation and deliverables, training, users' requirements and other records connected with the development and design of the system and its direct costs before it is ready for implementation.

EXPECTED COST

The expected cost for this project is \$45,000.

TIME FRAME

The audit is expected to commence as soon as possible to add value to the system's Project Management process. It will review the various deliverables as they become available. The system is expected to be ready for production in May 1996 and the audit will end at that time.

APPROVED BY :

A. Williams
Assistant Deputy Minister
Corporate Services
June 6, 1995

Action Plan

PROJECT TITLE / TITRE DU PROJET : Pre-Implementation Audit of PeopleSoft
 REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE : Human Resource Branch

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN OEUVRE
1. The Director General, Human Resources, should ensure that the requirements for PS/HRMS reports are identified.	8	1. Complete training of Power Users in Query/Crystal. 2. Continue Ad hoc report development. 3. Survey Human Resources Users on new reports.	Director, Staffing and Training Director, Staffing and Training Director, Staffing and Training	September 30, 1997

PROJECT TITLE / TITRE DU PROJET : Pre-Implementation Audit of PeopleSoft
 REGION OR BRANCH / RÉGION OU DIRECTION GÉNÉRALE : Information Management Branch

(1) RECOMMENDATIONS / RECOMMANDATIONS	(2) REPORT / RAPPORT PAGE NO.	(3) ACTION PLAN / PLAN D'ACTION	(4) RESPONSIBLE MANAGER / GESTIONNAIRE RESPONSABLE (TITLE / TITRE)	(5) PLANNED COMPLETION DATE / DATE PRÉVUE DE MISE EN OEUVRE
2. The Director General, Information Management, should ensure that the reports, identified as needed by users of the system, are developed.	8	Review user requirements with the Client. When requirements are clarified appropriate analysis, programming, testing, documentation and implementation will occur. It is planned to have these reports developed by a mix of internal resources and consultants. A contract to hire consultants is currently being prepared by HR.	Director, Information Systems	Reports are currently being developed. It is planned to have the reports completed by late summer or early fall. Completion date is dependent upon the availability of consulting resources. October 31, 1997
3. The Director General, Information Management, should ensure that E-mail policies are looked at to ensure the confidentiality of the PS/HRMS reports or files sent through E-mail is maintained.	10	It is planned to review the departmental E-mail policy. The issue of security pertaining to transmitting confidential information will be reviewed. The Information Infrastructure Directorate will commence a project in FY 97/98 to look at security and the implementation of the new government standard selected product ENTRUST.	Director, Information Infrastructure	Review of the E-mail policy will commence in May. Preliminary recommendation by late summer. The implementation schedule of ENTRUST is still to be determined. March 31, 1998