**Budget Cycle: 2013-2015 Biennium Version: AF - AGENCY FINAL REQUEST** 

### IT Project : Rules & Regulations Filing & Approval Application

**General Section** 

Contact Name: Colleen Byelick E-mail: colleen.byelick@nebraska.gov **Agency Priority:** 

Address: State Capitol, Suite 2300 Telephone: 4024712554 NITC Priority: NITC Score:

City: Lincoln

State: Nebraska Zip: 68509

### **Expenditures**

IT Project Costs	Total	Prior Exp	FY12 Appr/Reappr	FY14 Request	FY15 Request	Future Add
Contractual Services						
Design	0	0	0	0	0	0
Programming	200,000	0	0	150,000	50,000	0
Project Management	25,000	0	0	15,000	10,000	0
Data Conversion	0	0	0	0	0	0
Other	3,600	0	0	1,800	1,800	0
Subtotal Contractual Services	228,600	0	0	166,800	61,800	0
Telecommunications						
Data	0	0	0	0	0	0
Video	0	0	0	0	0	0
Voice	0	0	0	0	0	0
Wireless	0	0	0	0	0	0
Subtotal Telecommunications	0	0	0	0	0	0
Training						
Technical Staff	0	0	0	0	0	0
End-user Staff	0	0	0	0	0	0
Subtotal Training	0	0	0	0	0	0

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Expenditures						
IT Project Costs	Total	Prior Exp	FY12 Appr/Reappr	FY14 Request	FY15 Request	Future Add
Other Operating Costs						
Personnnel Cost	0	0	0	0	0	C
Supplies & Materials	0	0	0	0	0	C
Travel	0	0	0	0	0	C
Other	8,000	0	0	4,000	4,000	C
<b>Subtotal Other Operating Costs</b>	8,000	0	0	4,000	4,000	C
Capital Expenditures						
Hardware	0	0	0	0	0	C
Software	0	0	0	0	0	C
Network	0	0	0	0	0	C
Other	0	0	0	0	0	C
Subtotal Capital Expenditures	0	0	0	0	0	C
TOTAL PROJECT COST	236,600	0	0	170,800	65,800	C
unding						
Fund Type	Total	Prior Exp	FY12 Appr/Reappr	FY14 Request	FY15 Request	Future Add
General Fund	0	0	0	0	0	(
Cash Fund	236,600	0	0	170,800	65,800	(
Federal Fund	0	0	0	0	0	(
Revolving Fund	0	0	0	0	0	(
Other Fund	0	0	0	0	0	(
OTAL FUNDING	236,600	0	0	170,800	65,800	(
ARIANCE	0	0	0	0	0	O

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### IT Project: Rules & Regulations Filing & Approval Application

#### **EXECUTIVE SUMMARY:**

The proposed project is a multiple agency workflow and archival system for the promulgation and maintenance of proposed and current rules and regulations using the Enterprise Content Management System (ECM) provided by Hyland OnBase. Rules and Regulations (rule/s) affect virtually every citizen and business in Nebraska. The Secretary of State is the "keeper" of state agency rules. The basic process of promulgating rules is this: publication of a draft for comment by interested or affected citizens or businesses, hold public hearing, review and approval. Rules become effective, five days after filing with the Secretary of State and have the force and effect of a statute. The proposed system would begin with the post-hearing workflow and archiving.

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The OnBase ECM system would provide central document storage, where documents could be: checked out for modification, electronically sent to reviewers, electronically routed to final approvers, and electronically filed. The system would also maintain archived versions of the rules and interact with our online docket to notify subscribers about pending and approved rules. The official electronically stamped regulations would be published online allowing citizens' access to the official version of all current regulations.

By moving to an electronic system we would be able to maintain consistent formatting for rules, reduce filing errors and have the documents clearly dated maintaining the documents integrity throughout the process.

#### **GOALS, OBJECTIVES, AND OUTCOMES (15 PTS):**

Two major goals have been defined for this project. One is to eliminate the paper promulgation process and create a totally electronic workflow. The second goal is to publish the official rules online in a searchable format.

Section 3: Goals, Objectives, and Projected Outcomes (15 Points)

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- 1. Describe the project, including:
  - Specific goals and objectives;
  - Expected beneficiaries of the project; and
  - Expected outcomes.

Two major goals have been defined for this project. One is to eliminate the paper promulgation process and create a totally electronic workflow. The second goal is to publish the official rules online in a searchable format.

The first goal would be met by using ECM Onbase to create a web based workflow where documents could be: checked out for modification by an agency, electronically sent to reviewers, electronically routed to final approvers, and electronically filed. This project would involve all agencies. Each agency user would be limited to a very specific set of actions which they could perform. The system would maintain archived versions of the rules and would work with our current regulations website.

Benefits of using ECM OnBase are a streamlined process to promulgate rules with each agency using the exact same format. An electronic system avoids the current issue of formatting inconsistencies and the cumbersome promulgation process which includes copying and delivering four copies of the proposed rules to multiple approving and filing agencies. By using ECM we can create a workflow and format that would be utilized by each agency to deliver a properly vetted and reliable document.

The second goal addressed by using ECM OnBase is publishing the official rules online. Currently, the official stamped version is only available via paper copy. To accommodate the public, our office began posting the unofficial version of rules on our website several years ago. Today, citizens are predominately accessing rules using this online function. We receive very few requests for copies or paper versions of rules. The current online version of rules is not official and is simply a soft copy version provided by the agency. Often the versions are not dated and are not consistently formatted. Further, we do not have the staff to review each version to make sure it is identical to the official paper version filed in our office. Since we are the filer of state agency regulations, many other state agencies' websites link to our online version of the regulations

With ECM, we would be able to put the "official" file stamped version of the regulation online. Citizens would have real-time access to rules once filed. Moving to an electronic version of the regulation would allow for the document to be fully searchable online in a consistent format, with clear approval and filing date stamps.

An added benefit of moving to a totally electronic promulgation process is that our office would dramatically reduce the amount of staff time used for low value activities such as date stamping and filing each page of a filed rule. Many times rules encompass hundreds of pages of paper. In 2011, over 120 regulations were filed and processed. We currently

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receive three paper copies of each rule and manually date stamp each page received. We then file one copy in a current regulation binder by title, another copy in a file cabinet, and send one copy back to the agency. We also scan a paper copy into an access database for archiving and research purposes and make another copy of the regulation to file in an agency binder. These manual time consuming tasks would be eliminated with the proposed ECM system.

2. Describe the measurement and assessment methods that will verify that the project outcomes have been achieved.

The OCIO has provided a proposal as of August 2012 which included both functional requirements and project benefits. We believe the project will take the entire FY13-15 biennium to complete because all agencies will be affected by this system. We will measure success by meeting the functional requirements and benefits as laid out in the OCIO proposal. This includes getting all agencies, boards and commissions integrated into this system with standardized document formats. Furthermore, making sure the Governor's PRO and AG's Office are comfortable with and sign-off on the electronic workflow.

3. Describe the project's relationship to your agency comprehensive information technology plan.

This project is consistent with our agency's technology plan as existing technology will be utilized. Software and system licenses will be provided by the OCIO. The State's Active Directory and core network will be utilized for application communication, thus providing integrity, reliability and high system availability.

#### PROJECT JUSTIFICATION / BUSINESS CASE (25 PTS):

### Section 4: Project Justification / Business Case (25 Points)

4. Provide the project justification in terms of tangible benefits (i.e. economic return on investment) and/or intangible benefits (e.g. additional services for customers).

The greatest benefit of the OnBase ECM project is that workflow redundancies are eliminated and the official regulations are published and searchable online.

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This technology would move our promulgation process from a silo approach with each agency using slightly different formats to a shared service electronic system where each regulation would move through an identical process. A very specific set of statues are followed for the promulgation of regulations and moving to OnBase would allow for templates to be used for statutorily required documents. OnBase would effectively "lock down" the regulation so that once the post hearing process started editing the rule (document) would not be allowed and workflow would determine where the regulation was routed for approval. Document and process integrity would be heightened by using OnBase because of the ability to time and date-stamp each workflow step. Gaps in the current process, such as the regulation being returned to the agency after approval by the Attorney General's office, would be eliminated, creating a faster promulgation process. All in all the entire process would be clearer for the agencies and less cumbersome.

A major benefit for all citizens of the state will be the ability to have the official regulations available online. These documents will allow a person to use a key word search to search throughout the entirety of the code and pull up the stamped official version of the regulation. Currently the official stamped version is only available via paper copy. To accommodate the public, our office began posting the unofficial version of rules on our website several years ago. Today, citizens are predominately accessing rules using this online function. We receive very few requests for copies or paper versions of rules. The current online version of rules is not official and is simply a soft copy version provided by the agency. Often the versions are not dated and are not consistently formatted. Further, we do not have the staff to review each version to make sure it is identical to the official paper version filed in our office. Since we are the filer of state agency regulations, many other state agencies' websites link to our online version of the regulations

With OnBase ECM, we would be able to put the "official" file stamped version of the regulation online. Citizens would have real-time access to rules once filed. Moving to an electronic version of the regulation would allow for the document to be fully searchable online in a consistent format, with clear approval and filing date stamps.

A tangible benefit for our office would be the spaced gained from removing the need to retain three sets of regulations. Currently our office keeps one copy of the code indexed by title, one copy indexed by agency and a third copy indexed by agency, code and year. The official code is found only in our office in these paper formats and in a scanned PDF version of the same paper format. We estimate that our office supply usage, including paper, printing, and scanning costs used to process new regulations would be eliminated. Staff time could be reallocated to other higher value office needs, most likely moving towards using .5 FTE verses the current 1.0 FTE.

5. Describe other solutions that were evaluated, including their strengths and weaknesses, and why they were rejected. Explain the implications of doing nothing and why this option is not acceptable.

An electronic system was discussed in 2008 but at that time Nebraska had not begun to use ECM and there was no state vetted vender.

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Our office also looked at making the archived regulations into searchable documents. Archived regulations are kept in a PDF version. Converting PDF documents would have allowed historical archived rules to be searchable, but would not have eliminated the time spent maintaining a paper promulgation method nor would it have streamlined the promulgation process.

In reality citizens are using the online unofficial version of rules more than the official version found in our office. With this information, it is apparent that our office needed to make the official version available online and as user friendly as possible. We believe ECM OnBase delivers such a product.

6. If the project is the result of a state or federal mandate, please specify the mandate being addressed.

Not Applicable

#### **TECHNICAL IMPACT (20 PTS):**

7. Describe how the project enhances, changes or replaces present technology systems, or implements a new technology system. Describe the technical elements of the project, including hardware, software, and communications requirements. Describe the strengths and weaknesses of the proposed solution.

Using the OnBase ECM for promulgating rules and regulations would be a completely new electronic workflow and incorporate new technology. Currently, our agency uses a Microsoft Access Database to track Rules and Regulations metadata along with a Windows path to physically store the Rules and Regulations documents. Our agency will not require any hardware. The OnBase ECM system utilizes the OCIO's Active Directory for access permissions. No communication enhancements will be needed as our network resides on the State backbone. Since multiple agencies are involved in the promulgation process using a centralized technology that all agencies can have access too provides a great level of efficiency.

Access files would be imported into the OnBase SQL RDBMS with the OnBase application handling the regulation workflow functionality. The State's Active Directory and core network will be utilized for application communication, thus providing integrity, reliability and high system availability. OnBase ECM has already been vetted and purchased by the OCIO; furthermore OnBase has become the ECM standard as referenced in NITC Standard 5-101. Weaknesses of the project are minimal because of the nature of the technology and hosting presence.

8. Address the following issues with respect to the proposed technology:

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- Describe the reliability, security and scalability (future needs for growth or adaptation) of the technology.
- Address conformity with applicable NITC technical standards and guidelines (available at http://nitc.ne.gov/standards/) and generally accepted industry standards.
- Address the compatibility with existing institutional and/or statewide infrastructure.

The OnBase ECM System was chosen through an RFP selection process. The system has been properly vetted and subsequently approved by the NITC in its Standard 5-101. This project is consistent with our agency's technology plan as existing technology will be utilized. Software and system licenses will be provided by the OCIO through a monthly fee. The State's Active Directory and core network will be utilized for application communication, thus providing integrity, reliability and high system availability. It is our understanding that the OCIO will be responsible for the growth of storage moving forward.

#### PRELIMINARY PLAN FOR IMPLEMENTATION (10 PTS):

### Section 6: Preliminary Plan for Implementation (10 Points)

9. Describe the preliminary plans for implementing the project. Identify project sponsor(s) and examine stakeholder acceptance. Describe the project team, including their roles, responsibilities, and experience.

A preliminary plan has been submitted to the Secretary's office by the OCIO. The plan includes a two part solution beginning with a conversion of current regulations with the second part addressing the electronic workflow.

The project sponsor is the Secretary of State, John A. Gale. Stakeholders are the Agencies, Boards and Commissions of the State of Nebraska and the citizens and businesses of the State. Special approving stakeholders would be the Attorney General's Office and Governor's Policy Research Office.

SOS Project Team Members are: Grace Willnerd, Licensing Director; Colleen Byelick, General Counsel, Bess Boesiger, Rules and Regulations Assistant and Josh Daws, IT Manager.

OCIO OnBase ECM Team Members are still to be determined.

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10. List the major milestones and/or deliverables and provide a timeline for completing each.

Major Milestones: Project to take entire FY13-15

- Sign-off on a Statement of Work (SOW). (July 2013)
- 2. Planning of Business workflow with GPRO and AGO. (6 months)
- 3. Conversion of current regulations to OnBase (450 hours)
- 4. Meetings with State agencies to discuss workflow; receive input. (3 months)
- 5. System requirements meetings for development with OCIO OnBase ECM team. (6 months)
- 6. Testing and sign-off for each configuring document, workflow and eform. (6 months)
- 7. System training for SOS, GPRO, AGO and State agencies. (April/May 2015)
- 8. Signoff on the completed system. (June 2015)
- 11. Describe the training and staff development requirements.

Moving the promulgation of rules to the OnBase ECM System would involve training and staff development covering a multitude of different government agencies. The Secretary, Attorney General, and Governor's Policy Research Offices would have to be trained on the system as well as how they fit into the workflow of the promulgation.

Other departments that submit rules would have to be trained on how to submit as well as the formatting that would now be required.

12. Describe the ongoing support requirements.

The user fee is a monthly ongoing cost of \$36 per month per user x 4 users (\$144 per month x 24 months= \$3456 (biennium). Document storage costs are unknown at this time. Unless a statutory change occurs, we do not anticipate any changes to the system, if implemented. Only the Secretary of State's Office would incur the system cost going forward. All other agencies, boards and commissions would be utilizing the web based version of the OnBase ECM system at no cost.

#### RISK ASSESSMENT (10 PTS):

Section 7: Risk Assessment (10 Points)

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Possible barriers include agreement by agencies of the electronic workflow that should be applied. The process must be affirmed by the two approving agencies: Governor's Policy Research Office and the Office of the Attorney General. Receiving agencies, boards and commissions buy- in early on in the process will be very important to move the project forward.

Processing and migration 24,000 different Rules and Regulations into a single e-form format is a significant task to complete. It is unlikely that the migration process can be automated.

14. Identify strategies which have been developed to minimize risks.

Risks will be minimized by utilizing scheduled Joint Application Development (JAD) sessions to learn about the needs and concerns of agencies that promulgate regulations. During these JAD sessions we will cement the workflow to meet statutory requirements.

Adequate staff time will be given to the conversion step including as estimated 450 hours by the OCIO.

13. Describe possible barriers and risks related to the project and the relative importance of each.

#### FINANCIAL ANALYSIS AND BUDGET (20 PTS):

The agency proposes a one-time transfer of cash funds from the Corporation Cash fund (Fund 20920) to the Administration Cash Fund (Fund 20940) to cover the project costs in FY14 & FY15. Costs to include OnBase Licenses, ongoing document storage fees from the OCIO and document scanning through our Records Management Division (DISC). Statutory language would be necessary to enable the cash transfer between funds.

#### Attachments:

NESOS Rules\_Regs Creation PPD 083012.pdf
NESOS Post-Hearing Reg Change Workflow PPD 083012.pdf

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### **Project Proposal Document**

Ownership	
Client:	Nebraska Secretary of State (NESOS)
Project Name:	Rules/Regs Updates in OnBase
Key Stakeholder(s):	NESOS: Colleen Byelick – General Counsel
	Grace Willnerd – Assoc. General Counsel
	Bess Boesiger – Process SME
Other Stakeholder(s):	Josh Daws, Dale Arp, Kevin Keller

Overview	
Project Objectives:	<ul> <li>Migrate the current language for all agency regulations into OnBase</li> <li>Have current regulations available in OnBase at the Title, Chapter and Section level</li> <li>Provide agencies the ability to add, modify or delete Titles, Chapters or Sections of their regulations</li> </ul>
Project Benefits:	<ul> <li>Ability to lock down submitted changes throughout the process</li> <li>Ability for all agencies to select and submit only impacted language</li> <li>Online versioning and visibility into "before" and "after" of changes</li> <li>Ability to access regulations as they existed on a specific date</li> <li>Ability to search for and access any changes for a specific regulation within a specific date range</li> <li>Opportunity to eliminate multiple copies that may not be identical</li> <li>Opportunity to sync the "agency copy" with the "SOS copy"</li> </ul>

#### Functional Requirements

- The agencies need the ability to
  - o Add new language to an existing regulation
  - o Remove existing language from an existing regulation
  - o Modify existing language within a regulation
  - o A combination of add, remove or modify language within the same regulation
  - o Author a new regulation
  - o Repeal an existing regulation
  - o Merge multiple existing regulations
  - o Add, modify or remove forms affiliated with regulations
  - o Add, modify or remove appendices affiliated with regulations
- The user should be able to select and modify only impacted Titles, Chapters or Sections that need to be updated
- Both Tables of Contents (numerical and alphabetical) should reflect changes to the proposed regulations
- Page numbers should reflect changes to the proposed regulations
- The user will need to provide both a "clean" and "dirty" copy for review
- The users should have the ability to retrieve the version of a regulation that was in effect at a certain date
- The users should have the ability to retrieve any chapters or sections that were modified for a specific title within a certain date range
- Reserved Titles, Chapters and Sections must be created
- There should be a designation as to whether language within versions that may be accessible by the public is unofficial or official language.
- The users should have the ability to "claim" and use reserved Titles, Chapters and Sections when appropriate



- When repealing an existing Title, Chapter or Section, that respective component should then be marked as
  reserved and available for later use the text of that corresponding section should be archived and stored for
  historical purposes
- The approved, stamped official version should be presented to the public users who wish to read, download or print a regulation
- A text rendition of the regulations should be used to provide for search functionality
- The user should be able to use the utility that will be designed for the initial regulation section import to manually import old regulations and sections.

Proposed Dates		
Request Date:	8/23/12	
Proposed Start Date:	07/01/13	
Proposed Due Date:	1/01/14 (+/- 90 days)	
Dates are subject to change due to the project acceptance date and the availability of resource in said range of dates.		



High Level Task	Description	Est Hours	Hr. Rate	Est. Cost
Discovery/Requirements	Detailed Review of Process and Requirements	40	128	\$ 5,120.00
Development	Custom MS Word Integrations	40	128	\$ 5,120.00
Meeting and Information Sharing	Meetings to review and update progress as well as validate project deliverables	50	128	\$ 6,400.00
Documentation	Full Project Documentation	20	128	\$ 2,560.00
Solution Design	Doc Types, Folders, Keywords, End User Interface, Workflow: Lifecycles, notifications, timers, AdHoc Tasks - Document Composition: Templates - Security Setup	80	128	\$ 10,240.00
File Import	Process to bring SOS Sections	30	128	\$ 3,840.00
Testing	Unit Testing	80	128	\$ 10,240.00
Training	Train the trainer	16	128	\$ 2,048.00
Go Live Support	Production Issue Resolution	24	128	\$ 3,072.00
Project Management	Update project documentation, status, issue and task tracking, budget, client management and organize meetings and correspondence	70	128	\$ 8,960.00
		450		\$ 57,600.00

Estimates are based on eDoc's current understanding of project requirements. These estimates have a variance level of +/- 50%

#### Assumptions

This project proposal has been developed based on the following assumptions and restrictions to scope.

- 1. eDocument Resources (eDoc) must receive MS Word files from SOS in the format and granularity (Title, Chapter, Section) that SOS expects to use in OnBase.
- 2. SOS will provide a mapping document that will relate the title, chapter, section structure to the files submitted for importing into OnBase.
- 3. SOS will provide the original effective date and revised effective date for each Title, Chapter or Section that should be included in OnBase.
- 4. The current promulgation process includes and assumes some risk today at multiple process steps that the language being used and/or approved may not be identical to the "official copy."
- 5. The risk identified in #4 cannot be eliminated or transferred through this project. It will remain and be inherent in that the original source documentation provided for use in OnBase may not be 100% validated.
- **6.** During testing, the SOS will be responsible for coordinating, approving and accepting test data as it relates to the language and content within test files.
- **7.** As these documents are process triggers near the front of the promulgation process, this project may impact process steps of the agency themselves, the Executive Council and the Governor's Policy Review Office (GPRO).
- 8. A related project (NESOS Post-Hearing Reg Change Workflow) has been requested for review, also. The scope of that project is limited to the promulgation process steps beginning after approval at the agency hearing. As such, there may be unintentional impact to people and process steps in between the creation of the proposed regulation in OnBase and the point at which the proposed workflow begins. Neither proposed project addresses the gap in between.
- g. Any proposed solution and workflow would not include any automated awareness of circular references to pages, chapters or sections that could be impacted by adding, rearranging or deleting chapters or sections. Likewise, any possible references to other Titles that could be modified or repealed would also require manual research and updating.
- **10.** More research will be required as it pertains to supporting changes to graphs, charts, tables and other exhibits that are part of the document. This could impact any proposed solution and the final estimate.



- 11. All forms associated with a Title may need to be defined and mapped as individual items.
- 12. SOS would need to indicate known reserved Titles, Chapters and Sections prior to the solution build.
- **13.** This estimate does not include any workflow or process to submit the proposed regulation changes into the promulgation process.
- 14. Only current rules and regulations will initially be brought into OnBase under the scope of this project.
- **15.** This estimate does not include any effort or cost related to any meetings, research, analysis, demos or documentation associated with review, consideration or adoption by the AG, GPRO or any other associated agency or supporting body.

#### Dependencies

The successful implementation is dependent on, but not limited to, the following variables.

- 1. The acceptance and approval by affected departments not directly within the reporting structure of the SOS to change their processes and adopt steps and methods required by the process and associated systems to work as envisioned.
- **2.** The timing and approval of the proposed project is contingent upon funding availability and associated processes and timelines.

#### Risk

- 1. The current process assumes the risk that the initiating language submitted by the agency may not be the same as the current, approved regulatory language.
- 2. The current process does not validate that 100% of the text presented to the SOS in the final step is either a) consistent with current approved regulatory language or b) limited to only the intended, reviewed and approved changes.
- 3. The possibility that the AG and GPRO would not accept the conversion of complete, official documents into components as official, approved language. **UPDATE:** Per the 8/29 PPD walkthrough, this was not seen as an issue by SOS personnel.

### Outstanding Deliverables and Questions

- 1. eDoc needs to research what extent that MS Word formatting and changes can be controlled once the original requested format is in OnBase.
- 2. Need to walk through the process of merging two titles and whether there would be a complete re-write or whether selected chapters and sections would be combined into a new document.
- 3. It is currently unknown what the legal opinion would be of complete, official language that is parsed into pieces either by a system or person. Would the AG and GPRO accept those derivations of the original as still approved language? UPDATE: Per the 8/29 PPD walkthrough, this was not seen as an issue by SOS personnel.
- 4. There are graphs, charts and forms that aren't in MS Word today. Need to research how to support this in proposed solution.
- 5. SOS and eDoc need to walk through what the page numbering requirement will be (if any) going forward.

Executive Approval		
Executive Sponsor:	Date:	
Team Lead:	Date:	



### **Project Proposal Document**

Ownership	
Client:	Nebraska Secretary of State (NESOS)
Project Name:	Post-Hearing Rules/Regs Approval Workflow
Key Stakeholder(s):	NESOS: Colleen Byelick – General Counsel
	Grace Willnerd – Assoc. General Counsel
	Bess Boesiger – Process SME
Other Stakeholder(s):	Josh Daws, Dale Arp, Kevin Keller

Overview	
Project Objective:	Automate, simplify, digitize and report the promulgation process of agency regulation changes.
Project Benefits:	- Eliminate paper - Automated, electronic process - Streamlined process - Eliminate unnecessary steps where possible - Eliminate multiple copies - Real time access to updates by citizens - Reduce use of printing supplies by 50% - Reduce scanning costs - Improve useful life of scanning/printing hardware by lowering use and reducing wear - Increase FTE productivity by eliminating redundant, low value tasks - Simplify the process for all involved - Visibility into the status of each proposed change - Eliminate risk associated with "unofficial" version currently being published to public - #1 - Eliminate electronic/paper redundancy - Retire existing internal database - Improved reporting and querying functionality - Introduce electronic templates in place of some supporting required documents today that would auto-populate with known data - Document integrity – the system can validate the presence of all required documents prior to routing to Attorney General (AG)

### **Functional Requirements**

- Provide agencies with eForm templates that can replace some of the supporting documents used today
  - o eForms should auto-populate with known data when available and provide defined fields for free text entry
- The process should validate the presence of required supporting documents before sending on in the process
- The AG and Governor's Policy Review Office (GPRO) need the ability to review the proposed regulation as well as the related, required documents
- The AG and GPRO need the ability to Approve, Decline or Recall a submission
- The process should record the Received Date when the submission is received by the AG, GPRO and SOS.
- The process should record the decisions rendered by the AG and GPRO
- In real-time, the process should populate the following fields on the SOS website:
  - Attorney General Office Received
  - o Attorney General Office Approved



- Pre-defined statuses and terminology should be used
- o Governor's Policy Research Office Received
- Date Governor Approved
  - Pre-defined statuses and terminology should be used
- o Filed at Secretary of State
- Effective Date
  - All regulations are effective 5 calendar days following SOS filing, unless specifically noted for an effective date more than 5 days (ex -1/1/2013)
- Each of the aforementioned SOS web updates should also trigger an email notification to the distribution group that receives updates on proposed changes to regulations
- Users within the AG office and GPRO should have the ability to designate where there stamp will go and upon approval the workflow should stamp the "clean copy" and include either the initials or signature of the logged in user who approves the task.
- The originating agency should receive a notification when AG and GPRO approve the change and the submission is sent to the next step in the workflow
- The end of submitted language should contain notation as to the original effective date of the legislation as well as reflect the date of the most recent, approved change
  - o Ex FR 23603, Nov 4, 1972, as amended 50 FR 12466, Mar. 28, 1985
- The originating agency should have the ability to terminate the process at any point prior to the SOS submitting for storage (SOS Rec'd Date) and online publication
  - o This process should update the SOS website with language to reflect terminated at the agency's request
- The approved, stamped official version should be presented to the public users who wish to read, download or print a regulation at SOS site through Nebraska.gov.
- A text rendition of the regulations should be used to provide for search functionality online
- Monthly folders should be set up and retained for a rolling 12 months
  - o Approved regulation changes will be stored in the monthly folder based on date filed w/ SOS
- OnBase should publish monthly folders to CD for monthly electronic subscribers

Proposed Dates		
Request Date:	8/23/12	
Proposed Start Date:	07/01/13	
Proposed Due Date:	10/15/13 (+/- 90 days)	
Dates are subject to change due to the project acceptance date and the availability of resource in said range of dates.		



High Level Task	Description	Est Hours	Hr. Rate	Est. Cost
Discovery/Requirements	Detailed Review of Process and Requirements	80	\$ 128.00	\$ 10,240.00
Meeting and Information Sharing	Meetings to review and update progress as well as validate project deliverables	80	\$ 128.00	\$ 10,240.00
Integrations	Integration to SOS Website	80	\$ 128.00	\$ 10,240.00
Documentation	Full Project Documentation	40	\$ 128.00	\$ 5,120.00
Solution Design	Doc Types, Folders, Keywords, End User Interface, Workflow: Lifecycles, notifications, timers, AdHoc Tasks - Document Composition: Templates - Security Setup	140	\$ 128.00	\$ 17,920.00
Testing	Unit Testing	40	\$ 128.00	\$ 5,120.00
Training	Train the trainer	16	\$ 128.00	\$ 2,048.00
Go Live Support	Production Issue Resolution	24	\$ 128.00	\$ 3,072.00
Project Management	Update project documentation, status, issue and task tracking, budget, client management and organize meetings and correspondence	80	\$ 128.00	\$ 10,240.00
	·	580		\$ 74,240.00

Estimates are based on eDoc's current understanding of project requirements. These estimates have a variance level of +/- 50%

#### **Assumptions**

This project proposal has been developed based on the following assumptions and restrictions to scope.

- 1. The process steps in scope occur after the agency hearing and adoption. This proposal does not account for any possible changes to process or staff impact related to the steps, decisions and processing prior to agency adoption.
- 2. Any dates or statuses reported to the SOS website pertaining to activity that occurs prior to agency adoption will continue to be updated manually as is consistent with the current process.
- 3. The "Proposed Regulation Details" section of the "Proposed Rules and Regulations Docket" will continue to be populated manually and linked to the appropriate proposed regulation change.
- 4. The "Proposed Regulation Details" section does not need to be updated with any information from the post-hearing adoption process, nor does the proposed regulation need to be replaced with the approved regulation.
- 5. This project and workflow do not address the sub-processes, steps or decision making that occur within any of the agencies, nor specifically the supporting tasks of the AG office or GPRO.
- 6. The process as it relates to the AG and GPRO is simply to provide; a mechanism in which to present the proposed regulation as well as the required supporting documentation, the ability to approve, decline (substantial or non-substantial) or recall a proposed regulation, the ability to indicate where the stamp should be placed within the document and the stamp should bear either the signature or initials associated with the user decisioning the document.
  - **a.** When the AG or GPRO would recall a submission, it would be done because the submission was routed forward mistakenly. This recall function would return the submission to the queue of the agency that recalled it.
- **7.** The SOS office will maintain the email distribution groups to be used in status notifications to docket subscribers and subscribers to monthly updates.
- 8. Any proposed change that is rejected along this process (except AG non-substantial change) will be treated as a new and distinct submission if it is sent back through the process and does not need to maintain a relationship in the system with the previous unapproved submission
- 9. If a proposed regulation requires multiple submissions and as a result undergoes several iterations, there is no



requirement to track, retain and version the iterations between what was the existing regulation at the beginning of the process and the updated, approved regulation that results from the process.

- **a.** These unsuccessful submissions can be purged at any time.
- 10. The process update notifications that are currently sent to docket subscribers are a 1:1 relationship to each update, not a single daily update that combines all of the data for the day.
- 11. The SOS website fields "Attorney General Office Approved" and "Date Governor Approved" should also contain information related to adverse decisions.
- 12. Look and feel of Nebraska.gov should retain as much look and feel as present today
- 13. This estimate does not include any effort or cost related to any meetings, research, analysis, demos or documentation associated with review, consideration or adoption by the AG, GPRO or any other associated agency or supporting body.
- 14. This does not include a conversion of any existing regulation or any items currently in the existing process.

#### **Dependencies**

The successful implementation is dependent on, but not limited to, the following variables.

- 1. The acceptance and approval by affected departments not directly within the reporting structure of the SOS to change their processes and adopt steps and methods required by the process and associated systems to work as envisioned.
- 2. The appropriate legal authority(ies) must conclude that electronic dates, stamps and signatures satisfy any statutory requirements to carry the full effect of the law.
- 3. Successful implementation will require state IT resources and support related to data and documents within the current Access DB/Windows Shared Folder solution as well as integrating with the SOS website.
- 4. The timing and approval of the proposed project is contingent upon funding availability and associated processes and timelines.

#### Risk

- 1. The current process assumes the risk that the initiating language submitted by the agency may not be the same as the current, approved regulatory language.
- 2. The current process does not validate that 100% of the text presented to the SOS in the final step is either a) consistent with current approved regulatory language or b) limited to only the intended, reviewed and approved changes.
- 3. With 1 and 2 present in the current system, aside from eDocument Resources receiving source files that a) meet the business' requirements for defined section granularity and b) have been reviewed and approved as consistent with the current regulatory language, the current risk exposure could not be mitigated.

### Outstanding Deliverables and Questions

- 1. eDoc needs the format of the emails currently send to docket subscribers for both status updates as well as monthly updates.
- **2.** eDoc and SOS need to validate the assumption surrounding resubmissions and related tracking. There may be conflicting requirements.
- 3. eDoc and SOS need to discussion Document Retention and Records Management guidelines.

Executive Approval		
Executive Sponsor:	Date:	
Team Lead:	Date:	