36. Is the audit staff responsible to or subject to direction by any official who is also primarily responsible for an activity which might be audited?

No, the audit staff is responsible to and subject to direction by the Managing Director. This official is not responsible for any of the substantive program areas within the Commission.

37. Are the personnel assigned to the internal audit function adequately protected from recriminations and arbitrary personnel action that might result from an adverse effect of their reports upon other agency employees?

Yes, the personnel assigned to the internal audit function are adequately protected from recriminations and arbitrary personnel action because they are responsible to the Managing Director whose functions do not include the substantive program areas.

38. Are all reports and recommendations of the internal audit staff available to the Comptroller General and to appropriate congressional committees?

Yes, all reports and recommendations of the internal audit staff are available to the Comptroller General and to appropriate congressional committees. They have in fact been made available in the past.

F. *Automatic data processing*

39. Do you have a central organization in your agency which is responsible for ADP management?

Yes. In prior years there were three separate ADP activities in the Commission all located in subordinate bureaus. Subsequent reorganizations have centralized all data processing including management in the Office of the Managing Director.

40. Will you describe its functions?

The Section of Systems Development is responsible, under the Office of the Managing Director, for conducting studies to determine the feasibility of applying automatic and other data processing methods to the Commission's operations and work processes. Whenever potential applications are identified, it develops, validates and implements complete systems. It operates the physical data processing facility and provides automatic data processing services to the Commission and in certain instances to the public, on a reimbursable basis, in conjunction with the Commission's improved service to the public program. It also advises, assists, organizes, and conducts studies as required in the application of operations research techniques.

41. Who has the responsibility for deciding whether or not the use of a computer for a particular function within your agency is justified?

The responsibility for decision to use a computer for a specific application resides in various organizational levels depending upon the magnitude or complexity of the proposed application. For example, a decision on a relatively minor application may be made at the section chief level in the office of the managing director. Decisions on larger applications are made at the level of the managing director, the chairman or the entire commission, again depending upon the magnitude of the proposal.

42. On what basis is the decision made? Are there documented systems studies available for review in all cases?

The basis used for deciding whether to use a computer for a particular function varies for each function. Monetary savings, manpower savings, timeliness of data, availability of data, availability of computer time, availability of data processing manpower, existing priorities and present workloads and many other considerations can play a part in this decision.

The following is a list of general steps which are taken in most instances:

(1) Determine a real need for the data.

(2) Review the existing method of obtaining this data, if one already exists.

(3) Determine if it is possible to obtain the required data by any other method and determine the cost and timeliness of such a method.

(4) Determine the feasibility of obtaining the required data on the computer.

(5) Project the costs involved in using the computer including the "ongoing" cost of producing the data and the "one-time" cost of developing the computer system, i.e, programing, systems design, etc.

The above steps will present a factual picture of the present situation and all alternate avenues available from which a decision can be based. There are many tangibles and intangibles which could and usually do affect the steps taken and the decisions made.