



**STATE INFORMATION
TECHNOLOGY
SERVICES DIVISION**

Department of Administration

John Lewis, Director

Tim Bottenfield, State Chief Information Officer

July 31, 2020

Montana Legislature
Legislative Finance Committee – Education Subcommittee
State Capitol, PO Box 201706
Helena, MT 59620-1706

Re: Advertising on mt.gov websites

Dear Chairperson Bedey and Members of the Legislative Finance Committee – Education Subcommittee:

Thank you for the opportunity to comment regarding advertising on public websites. As reflected in the State of Montana Information Technology Strategic Plan, innovation and efficiency drive our work. The Department of Administration, State Information Technology Services Division (SITSD), meets regularly with agency executive, fiscal, and IT professionals to support agency efforts to deliver government services in a cost-effective and secure manner. While generating new revenue is an idea worth exploring, SITSD believes allowing advertising on public websites would create problems for the state and may ultimately increase costs.

Placing ads on state websites would violate current policy as well as the United States General Services Administration (GSA) requirements governing all websites that use the .gov domain. The state Web Advertising and Linking Policy, provided with this letter, applies to all state agencies and specifically prohibits advertising on state websites. The policy itself identifies several reasons for the prohibition, including the inability to control links to other websites that may jeopardize the security of agency and individual user data, inability to mitigate risks to user privacy, and the appearance of implicit endorsement of messages that may not reflect the official policy of the state. Also, by opening the door to advertising, even with strict guidelines, the state may risk engaging in constitutionally prohibited behavior due to the interconnected nature of the Internet.

GSA policy forbids advertising for private individuals, firms, and political campaigns on all websites in the .gov domain. An agency that wanted to allow advertising would be required to create its website on another domain (e.g., .com, .org, .net), which could lead to confusion regarding whether users are interacting with a government agency or perhaps a malicious actor leveraging the ambiguity to obtain users' sensitive information.

Given these concerns, it is likely the increased security expenses required to monitor and defend against malicious web advertising would negate any revenue generated by allowing advertising on state websites. Should the Subcommittee have questions regarding our analysis or current policy, we would be happy to follow up with you collectively or individually. As always, I appreciate your interest in information technology matters.

Sincerely,

Tim Bottenfield
State Chief Information Officer