

**DEPARTMENT OF HIGHWAY SAFETY  
AND MOTOR VEHICLES**

Bureau of Motorist Services Support Quality  
Assurance Program and Prior Audit Follow-Up



Sherrill F. Norman, CPA  
Auditor General

## **Executive Director of the Department of Highway Safety and Motor Vehicles**

The Department of Highway Safety and Motor Vehicles is established by Section 20.24, Florida Statutes. The head of the Department is the Governor and Cabinet. Pursuant to Section 20.05(1)(g), Florida Statutes, the Governor and Cabinet are responsible for appointing an Executive Director of the Department. Terry L. Rhodes served as Executive Director during the period of our audit.

The team leader was David Cain, CPA, and the audit was supervised by Samantha Perry, CPA.

Please address inquiries regarding this report to Samantha Perry, CPA, Audit Manager, by e-mail at [samanthaperry@aud.state.fl.us](mailto:samanthaperry@aud.state.fl.us) or by telephone at (850) 412-2762.

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# DEPARTMENT OF HIGHWAY SAFETY AND MOTOR VEHICLES

## Bureau of Motorist Services Support Quality Assurance Program and Prior Audit Follow-Up

### **SUMMARY**

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This operational audit of the Department of Highway Safety and Motor Vehicles (Department) focused on the Bureau of Motorist Services Support Quality Assurance (QA) Program and included a follow-up on applicable findings included in our report No. 2020-191. Our audit disclosed the following:

#### **Quality Assurance Program**

**Finding 1:** Department controls for the QA Program, responsible for reviewing driver's license and motor vehicle title and registration transactions, need enhancement to better evidence the proper planning and oversight of QA reviews, distribution of review reports, and notification of potential fraudulent or otherwise questionable transactions.

#### **Information Technology Controls**

**Finding 2:** Certain security controls related to Online Registration and Identity Operating Network (ORION) and Florida Real Time Vehicle Information System (FRVIS) user authentication need improvement.

**Finding 3:** Department change management controls need improvement to demonstrate that ORION and FRVIS program code changes do not bypass the established Department change management process.

**Finding 4:** ORION and FRVIS user access privileges were not always promptly deactivated after users separated from Department employment and Department access privilege reviews need enhancement.

**Finding 5:** Security controls over mobile device utilization continue to need improvement to ensure the confidentiality, integrity, and availability of Department data and information technology resources.

### **BACKGROUND**

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The mission of the Department of Highway Safety and Motor Vehicles (Department) is to provide highway safety and security through excellence in service, education, and enforcement. The Department partners with county tax collectors and local, State, and Federal law enforcement agencies to promote a safe driving environment, issue driver's licenses and identification cards, facilitate motor vehicle transactions, and provide consumer protection and public safety services. The Department plans, administers, and delivers its programs and services through the Division of the Florida Highway Patrol, Division of Motorist Services, Division of Administrative Services, and Division of Information Systems Administration. For the 2021-22 fiscal year, the Legislature appropriated approximately \$506 million to the Department and authorized 4,334 positions.<sup>1</sup>

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<sup>1</sup> Chapter 2021-36, Laws of Florida.

# FINDINGS AND RECOMMENDATIONS

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## QUALITY ASSURANCE PROGRAM

State law<sup>2</sup> authorizes county tax collectors<sup>3</sup> to provide driver's license and motor vehicle title and registration services. The Department's Quality Assurance Program (QA Program) within the Division of Motorist Services, Bureau of Motorist Services Support, reviews driver's license and motor vehicle title and registration transactions processed by State service centers,<sup>4</sup> county tax collector office service centers, and license plate agents (as well as related procedures) to ensure that driver's licenses and motor vehicle titles and registrations are issued in compliance with Federal regulations, State law, and Department policies and procedures.

### Finding 1: QA Program Reviews

To improve compliance and customer service, the QA Program provides data to service center management based on four types of reviews performed:

- Independent Reviews – reviews requested by Department or county tax collector management when noncompliant transactions are noted and management wants a focused review of transactions processed by a specific employee.
- Legal Presence Reviews – reviews of three types of legal presence status determinations made by service centers:<sup>5</sup> Temporary Protected Status, Verification of Lawful Status Exceptions, and immigration status changes.
- Motor Vehicle Reviews – requested by Department or county tax collector management based on tips received from other states and local tax collector offices as well as data analytics, and include transactions related to motor vehicle titles, registrations, and disabled person parking permits.
- Targeted Reviews – reviews of driver's license, motor vehicle title, or registration transactions identified by the QA Program as having an increased risk of noncompliance.

According to QA Program management, an annual review plan was developed identifying the types of reviews to be completed during the year. For each review, QA Program management was to establish guidelines outlining the specific review objectives and types of transactions to be reviewed. QA Program employees were to review the transactions for compliance with Federal regulations, State law, and Department policies and procedures and document any findings with applicable comments. Transactions recommended for cancellation were to be forwarded to Bureau of Motorist Compliance or other applicable management for review and final determination. Review results were to be summarized by QA Program staff in a report, which was to be reviewed and approved by QA Program management and distributed to requesting management.

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<sup>2</sup> Sections 320.03, 322.02, and 328.73, Florida Statutes.

<sup>3</sup> Sections 197.332 and 320.04, Florida Statutes, permit tax collectors to contract with license plate agents to provide license plate services.

<sup>4</sup> The State is responsible for processing driver's license and motor vehicle title and registration transactions in Broward, Miami-Dade, and Volusia counties.

<sup>5</sup> Section 322.051, Florida Statutes, requires customers to provide acceptable immigration identification evidence permitting them to visit or reside in the United States.

During the period July 2020 through January 2022, the QA Program completed 26 Independent Reviews, 3 Legal Presence Reviews, 15 Motor Vehicle Reviews, and 25 Targeted Reviews. As part of our audit, we evaluated QA Program controls and examined Department records for 3 Independent Reviews, 1 Legal Presence Review, 2 Motor Vehicle Reviews, and 3 Targeted Reviews. Our audit procedures found that QA Program management had not established policies and procedures for QA Program reviews and the lack of such policies and procedures may have contributed to the following:

- QA Program records did not adequately evidence for the Targeted, Motor Vehicle, and Independent Reviews tested how the review objectives and types of transactions to be reviewed were established. In addition, the review guidelines provided by QA Program management to the employees conducting the reviews did not always include details that could enhance the conduct of the reviews. For example, the review guidelines for 1 Independent Review and 1 Motor Vehicle Review directed the employee to review for egregious findings but did not define what constituted an egregious finding. Additionally, for another Independent Review, the review guidelines directed the employee to review for trends and anomalies but did not specify which trends or anomalies.
- QA Program records did not evidence that QA Program management reviewed and approved any of the 9 selected review reports.
- For 1 Targeted and 2 Independent Reviews, QA Program records did not evidence that the review reports were distributed to requesting management.

According to QA Program management, due to the complexity and requirements of the reviews, the QA Program had not established review policies and procedures and, instead, relied on the experience of the employees performing the reviews.

Additionally, as part of the 9 reviews included in our audit testing, the QA Program reviewed 51,456 driver's license and 6,939 motor vehicle title and registration transactions. We examined records for 320 of these transactions and found that:

- QA Program records did not evidence that Bureau of Motorist Compliance management was notified of 6 transactions identified by a QA Program review as potentially fraudulent or otherwise requiring cancellation. In response to our audit inquiry, QA Program management indicated that records evidencing notification were not available because of the absence of established policies and procedures for such notifications, certain transactions were verbally discussed with law enforcement who initiated the review, and employee oversight.
- For 3 transactions, the comments related to the findings noted by the QA Program review were incorrect. According to QA Program management, the comments for 2 transactions were not updated from the prior review and, for the other transaction, an incorrect comment was included due to employee oversight. In addition, for another transaction, the finding noted by the QA Program review was incorrect. As a result, incorrect results were reported to Department management. According to QA Program management, the worksheet used by the reviewer included prepopulated findings and, in this instance, the reviewer did not select the best descriptive finding.

Written policies and procedures that reflect current operating practices and applicable Federal regulations, State law, and Department policies and procedures for driver's license and motor vehicle title and registration transactions would increase QA Program management's assurance that QA reviews are conducted and documented in accordance with management's expectations and relevant requirements. In addition, management notification of and documentation supporting all transactions

found by a QA Program review as potentially fraudulent or requiring cancellation would provide assurance that appropriate action is taken to address questionable transactions.

**Recommendation:** We recommend that QA Program management establish QA Program review policies and procedures that reflect current operating practices and applicable Federal regulations, State law, and Department policies and procedures for driver's license and motor vehicle title and registration transactions. We also recommend that QA Program management ensure that QA Program records evidence the proper planning and oversight of all QA Program reviews, distribution of review reports, and management notification of potentially fraudulent or otherwise questionable transactions.

## INFORMATION TECHNOLOGY CONTROLS

Service center employees utilize the Department's Online Registration and Identity Operating Network (ORION) to process driver's licenses, identification cards, and administrative hearing applicant information and the Department's Florida Real Time Vehicle Information System (FRVIS) to process title and registration transactions. As part of our audit, we evaluated selected ORION, FRVIS, and Department mobile device controls.<sup>6</sup>

### Finding 2: User Authentication Controls

Security controls are intended to protect the confidentiality, integrity, and availability of data and information technology (IT) resources. Our audit procedures disclosed that certain security controls related to ORION and FRVIS user authentication need improvement. We are not disclosing specific details of the issues in this report to avoid the possibility of compromising Department data and IT resources. However, we have notified appropriate Department management of the specific issues.

Without appropriate security controls related to ORION and FRVIS user authentication, the risk is increased that the confidentiality, integrity, and availability of Department data and IT resources may be compromised.

**Recommendation:** We recommend that Department management enhance certain security controls related to ORION and FRVIS user authentication to ensure the confidentiality, integrity, and availability of Department data and related IT resources.

### Finding 3: Change Management Controls

Effective change management controls are intended to ensure that the established change management process is followed when program code changes are implemented into the production environment and that all program modifications are properly authorized, tested, and approved for implementation into the production environment. To evaluate the appropriateness of Department change management controls for program code changes implemented into the ORION and FRVIS production environments, we requested a system-generated list of all program code changes implemented during the period July 2020

<sup>6</sup> Mobile devices are portable devices, such as laptop computers, smartphones, and tablets, that allow storage and transmittal of entity data.

through January 2022. However, the Department was unable to provide a system-generated list of all program code changes implemented.

In response to our audit inquiry, Department management indicated that the Department utilized a change management ticketing system that contained all approved program modifications and relied on separation of duties to ensure that all program code changes were properly authorized, tested, and approved for implementation into the production environment. Notwithstanding, absent a system-generated list of all program code changes implemented into the ORION and FRVIS production environments, Department management cannot demonstrate that all program code changes did not bypass the Department's established change management process.

**Recommendation:** We recommend that Department management enhance change management controls to ensure that Department system records evidence that all ORION and FRVIS program code changes did not bypass the established Department change management process.

#### **Finding 4: Access Privilege Controls**

Department of Management Services (DMS) rules<sup>7</sup> require State agencies to periodically review user access privileges for appropriateness and ensure that IT access privileges are removed when access to an IT resource is no longer required. Periodic reviews of access privileges help ensure that only authorized users have access and that the access privileges remain appropriate. Effective periodic reviews include identifying the current access privileges of system users and evaluating the assigned access privileges to ensure that they align with user job responsibilities. Prompt action to remove access privileges is necessary to help prevent misuse of the access privileges.

To access ORION and FRVIS, users must have an active Oracle account. As part of our audit, we requested Department procedures for conducting periodic ORION and FRVIS access privileges reviews and documentation of the last ORION and FRVIS user access privileges review performed by the Department during the period July 2020 through January 2022. While Department management provided documentation evidencing periodic review of inactive Oracle accounts and indicated that the Department locked all inactive accounts, the Department had not established related review procedures. Additionally, notwithstanding the inactive Oracle accounts review, the Department's review did not encompass ORION and FRVIS users who may no longer have required access due to a change in position or job responsibilities.

Our review of ORION and FRVIS user access records for the 329 ORION users and 26 FRVIS users who separated from Department employment during the period July 2020 and January 2022 found that the Department did not timely deactivate the access privileges for 142 ORION and 7 FRVIS users. Specifically, the ORION users' access privileges were deactivated 1 to 243 days (an average of 16 days) after the users separated from Department employment and the FRVIS users' access privileges were deactivated 60 to 173 days (an average of 113 days) after the users separated from Department employment. Notwithstanding the untimely deactivation of access privileges, our audit tests disclosed that none of the user accounts were used to access ORION or FRVIS subsequent to the users' employment separation dates. In response to our audit inquiry, Department management indicated that

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<sup>7</sup> DMS Rule 60GG-2.003(1)6., Florida Administrative Code.

the delays in deactivating the access privileges were due to managers not timely completing the offboarding process as well as oversights in noting that an ORION or FRVIS account required deactivation.

Periodic comprehensive reviews of IT user access privileges and prompt deactivation of user access privileges upon an employee's separation from Department employment provide Department management assurance that user access privileges are authorized and remain appropriate. Additionally, prompt deactivation of IT user access privileges limits the potential for unauthorized disclosure, modification, or destruction of Department data and IT resources by former employees or others.

**Recommendation:** We recommend that Department management establish procedures for and ensure that Department records evidence periodic reviews of the appropriateness of all ORION and FRVIS user access privileges. We also recommend that Department management enhance controls to ensure that ORION and FRVIS user access privileges are deactivated immediately upon a user's separation from Department employment.

#### **Finding 5: Mobile Device Security Controls**

Security controls are intended to protect the confidentiality, integrity, and availability of data and IT resources. Our audit procedures disclosed that certain security controls related to mobile device utilization need improvement. We are not disclosing specific details of the issues in this report to avoid the possibility of compromising Department data and IT resources. However, we have notified appropriate Department management of the specific issues.

Without appropriate security controls related to the use of mobile devices by Department and non-Department employees, the risk is increased that confidentiality, integrity, and availability of Department data and IT resources may be compromised. A similar finding was communicated to Department management in connection with our report No. 2020-191 (Finding 5).

**Recommendation:** We recommend that Department management enhance certain security controls related to Department and non-Department employee use of mobile devices to ensure the confidentiality, integrity, and availability of Department data and related IT resources.

### ***PRIOR AUDIT FOLLOW-UP***

Except as discussed in the preceding paragraphs, the Department had taken corrective actions for the applicable findings included in our report No. 2020-191.

### ***OBJECTIVES, SCOPE, AND METHODOLOGY***

The Auditor General conducts operational audits of governmental entities to provide the Legislature, Florida's citizens, public entity management, and other stakeholders unbiased, timely, and relevant information for use in promoting government accountability and stewardship and improving government operations.

We conducted this operational audit from February 2022 through June 2022 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit

to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

This operational audit of the Department of Highway Safety and Motor Vehicles (Department) focused on the Bureau of Motorist Services Support Quality Assurance (QA) Program. For those areas, the objectives of the audit were to:

- Evaluate management's performance in establishing and maintaining internal controls, including controls designed to prevent and detect fraud, waste, and abuse, and in administering responsibilities in accordance with applicable laws, administrative rules, contracts, grant agreements, and other guidelines.
- Examine internal controls designed and placed into operation to promote and encourage the achievement of management's control objectives in the categories of compliance, economic and efficient operations, the reliability of records and reports, and the safeguarding of assets, and identify weaknesses in those internal controls.
- Identify statutory and fiscal changes that may be recommended to the Legislature pursuant to Section 11.45(7)(h), Florida Statutes.

Our audit also included steps to determine whether management had corrected, or was in the process of correcting, applicable deficiencies noted in our report No. 2020-191 (Findings 2, 5, and 7).

This audit was designed to identify, for those programs, activities, or functions included within the scope of the audit, deficiencies in internal controls significant to our audit objectives; instances of noncompliance with applicable governing laws, rules, or contracts; and instances of inefficient or ineffective operational policies, procedures, or practices. The focus of this audit was to identify problems so that they may be corrected in such a way as to improve government accountability and efficiency and the stewardship of management. Professional judgment has been used in determining significance and audit risk and in selecting the particular transactions, legal compliance matters, records, and controls considered.

As described in more detail below, for those programs, activities, and functions included within the scope of our audit, our audit work included, but was not limited to, communicating to management and those charged with governance the scope, objectives, timing, overall methodology, and reporting of our audit; obtaining an understanding of the program, activity, or function; identifying and evaluating internal controls significant to our audit objectives; exercising professional judgment in considering significance and audit risk in the design and execution of the research, interviews, tests, analyses, and other procedures included in the audit methodology; obtaining reasonable assurance of the overall sufficiency and appropriateness of the evidence gathered in support of our audit's findings and conclusions; and reporting on the results of the audit as required by governing laws and auditing standards.

Our audit included the selection and examination of transactions and records. Unless otherwise indicated in this report, these transactions and records were not selected with the intent of statistically projecting the results, although we have presented for perspective, where practicable, information concerning relevant population value or size and quantifications relative to the items selected for examination.

An audit by its nature, does not include a review of all records and actions of agency management, staff, and vendors, and as a consequence, cannot be relied upon to identify all instances of noncompliance, fraud, waste, abuse, or inefficiency.

In conducting our audit, we:

- Reviewed applicable laws, rules, Department policies and procedures, and other guidelines, and interviewed Department personnel to obtain an understanding of QA Program processes.
- Inquired of Department management regarding whether the Department made any expenditures or entered into any contracts under the authority granted by an applicable state of emergency declaration during the period July 2021 through January 2022.
- Obtained an understanding of selected Department information technology (IT) controls, assessed the risks related to those controls, evaluated whether selected general and application IT controls for the Online Registration and Identity Operating Network and Florida Real Time Vehicle Information System were in place, and tested the effectiveness of the selected controls.
- From the population of 69 QA Program reviews performed during the period July 2020 through January 2022, examined Department records for 9 selected reviews to determine whether the reviews were performed in accordance with applicable Department guidelines. Specifically:
  - From the population of 3 Legal Presence Reviews conducted during the period July 2020 through January 2022, examined Department records for 1 selected review and 80 legal presence transactions included in the review, 40 selected from the population of 3,348 legal presence transactions subject to advanced review and 40 selected from the population of 44,480 legal presence transactions not subject to advanced review.
  - From the population of 15 Motor Vehicle Reviews conducted during the period July 2020 through January 2022, examined Department records for 2 selected reviews and 80 motor vehicle transactions included in the reviews, 40 selected from the population of 614 motor vehicle transactions subject to advanced review and 40 selected from the population of 638 motor vehicle transactions not subject to advanced review.
  - From the population of 27 Independent Reviews conducted during the period July 2020 through January 2022, examined Department records for 3 selected reviews and 80 transactions included in the reviews, 40 selected from the population of 475 transactions subject to advanced review and 40 selected from the population of 3,153 transactions not subject to advanced review.
  - From the population of 24 Targeted Reviews conducted during the period July 2020 through January 2022, examined Department records for 3 selected reviews and 80 transactions included in the reviews, 40 selected from the population of 652 transactions subject to advanced review and 40 selected from the population of 5,035 transactions not subject to advanced review.
- Evaluated Department actions to correct Findings 2, 5, and 7 noted in our report No. 2020-191. Specifically, we reviewed applicable laws, rules, regulations, and Department policies and procedures, and interviewed Department management. In addition:
  - From the population of 5,500 property items, with acquisition costs totaling \$18,491,669, disposed of during the period July 2020 through January 2022, examined Department records for 25 selected property items disposed of, with acquisition costs totaling \$277,775, to determine whether the Department complied with Section 273.055, Florida Statutes, Department of Financial Services Rules, Chapter 69I, Florida Administrative Code, Department of Management Services Rules, Chapter 60B, Florida Administrative Code, as applicable, and Department policies and procedures when disposing of and accounting for disposed property items.
  - From the population of 2,339 Department-owned mobile devices (laptop computers and tablets) recorded in Department property records as of January 2022, examined Department records for 25 selected mobile devices to determine whether the Department ensured that

- security controls were properly deployed on each Department-owned mobile device in accordance with applicable rules and Department policies and procedures.
- From the population of 164 Third-Party Administrators (TPAs) under contract with the Department during the period July 2020 through January 2022, examined on-site monitoring records for 16 selected TPAs to determine whether Department records evidenced the driver applicant records selected for review and the review results. In addition, analyzed Department monitoring records for the 164 TPAs to determine whether the Department conducted annual monitoring of all TPAs in accordance with Title 49, Parts 383 and 384, Code of Federal Regulations, and Section 322.56(4), Florida Statutes.
  - Reviewed applicable laws, rules, and other State guidelines to obtain an understanding of the legal framework governing Department operations.
  - Interviewed Department management, examined Department forms, and evaluated Department compliance with applicable statutory requirements for collecting and utilizing individuals' social security numbers.
  - Observed, documented, and evaluated the effectiveness of selected Department processes and procedures for:
    - Cash and revenue management, purchasing activities, settlement agreements, and fixed capital outlay.
    - The administration of Department contracts. As of March 9, 2022, the Department was responsible for 3,835 active contracts with expenditures totaling \$261,649,647.
    - Ensuring compliance with the requirements of the Florida Single Audit Act. During the period July 2020 through January 2022, the Department expended \$64,916,616 for 130 State Financial Assistance programs.
  - Communicated on an interim basis with applicable officials to ensure the timely resolution of issues involving controls and noncompliance.
  - Performed various other auditing procedures, including analytical procedures, as necessary, to accomplish the objectives of the audit.
  - Prepared and submitted for management response the findings and recommendations that are included in this report and which describe the matters requiring corrective actions. Management's response is included in this report under the heading **MANAGEMENT'S RESPONSE**.

## **AUTHORITY**

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Section 11.45, Florida Statutes, requires that the Auditor General conduct an operational audit of each State agency on a periodic basis. Pursuant to the provisions of Section 11.45, Florida Statutes, I have directed that this report be prepared to present the results of our operational audit.



Sherrill F. Norman, CPA  
Auditor General

# MANAGEMENT'S RESPONSE

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**Terry L. Rhodes**  
Executive Director

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**Ron DeSantis**  
Governor

**Ashley Moody**  
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**Jimmy Patronis**  
Chief Financial Officer

**Nikki Fried**  
Commissioner of Agriculture

November 2, 2022

Sherrill Norman, CPA  
Auditor General  
G74 Claude Pepper Building  
111 West Madison Street  
Tallahassee, Florida 32399-1450

Dear Ms. Norman:

Thank you for the opportunity to respond to the preliminary and tentative findings and recommendations from your operational audit of the Department of Highway Safety and Motor Vehicles. We appreciate the efforts of your staff and in accordance with Section 11.45(4)(d), Florida Statutes, we have included our response to the recommendations made in your report.

The Department of Highway Safety and Motor Vehicles is committed to providing highway safety and security through excellence in service, education, and enforcement. The results of your report will be used as part of the Department's continuous efforts to improve operations.

If you have any questions regarding our response, please contact Erin Mook, Audit Director at (850) 617-3104.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Terry L. Rhodes'.

Terry L. Rhodes  
Executive Director

TLR/em  
Enclosure

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**Department of Highway Safety and Motor Vehicles**  
**Response to the Auditor General’s Operational Audit**  
**Preliminary and Tentative Audit Findings**

**Finding No. 1: Quality Assurance Program Reviews**

Department controls for the QA Program, responsible for reviewing driver’s license and motor vehicle title and registration transactions, need enhancement to better evidence the proper planning and oversight of QA reviews, distribution of review reports, and notification of potential fraudulent or otherwise questionable transactions.

**Recommendation**

We recommend that QA Program management establish QA Program review policies and procedures that reflect current operating practices and applicable Federal regulations, State law, and Department policies and procedures for driver’s license and motor vehicle title and registration transactions. We also recommend that QA Program management ensure that QA Program records evidence the proper planning and oversight of all QA Program reviews, distribution of review reports, and management notification of potentially fraudulent or otherwise questionable transactions.

**Agency Response**

During the operational audit, the Quality Assurance Program noted room for improvement and revised the review guidelines provided to our members prior to starting a review; however, the Quality Assurance Program concurs with the finding and will formalize Quality Assurance Program Procedures to reflect our current operating practices. These procedures will include proper evidence of the planning, review steps, and findings to ensure reviews are conducted in accordance with management’s expectations. Additionally, these procedures will evidence the finalization and distribution of review findings and the applicable actions taken to ensure Department records are accurate.

**Finding No. 2: User Authentication Controls**

Certain security controls related to Online Registration and Identity Operating Network (ORION) and Florida Real Time Vehicle Information System (FRVIS) user authentication need improvement.

**Recommendation**

We recommend that Department management enhance certain security controls related to ORION and FRVIS user authentication to ensure the confidentiality, integrity, and availability of Department data and related IT resources.

**Agency Response**

Management concurs with finding 2. The Department will evaluate alternatives that can enhance security controls related to ORION and FRVIS user authentication and implement where possible.

**Department of Highway Safety and Motor Vehicles  
Response to the Auditor General’s Operational Audit  
Preliminary and Tentative Audit Findings**

**Finding No. 3: Change Management Controls**

Department change management controls need improvement to demonstrate that ORION and FRVIS program code changes do not bypass the established Department change management process.

**Recommendation**

We recommend Department management enhance change management controls to ensure that Department system records evidence that all ORION and FRVIS program code changes did not bypass the established Department Change management process.

**Agency Response**

Management concurs with finding 3. The Department will explore alternatives related to a tool that will provide evidence of code changes in ORION and FRVIS. Once acceptable alternatives are identified, the Department will need to request additional appropriations in order to implement and maintain a solution. Management will continue to review and refine our manual processes as well as draft an LBR proposal for consideration.

**Finding No. 4: Access Privilege Controls**

ORION and FRVIS user access privileges were not always promptly deactivated after users separated from Department employment and Department access privilege reviews need enhancement.

**Recommendation**

We recommend that Department management establish procedures for and ensure that Department records evidence periodic reviews of the appropriateness of all ORION and FRVIS user access privileges. We also recommend that Department management enhance controls to ensure that ORION and FRVIS user access privileges are deactivated immediately upon a user’s separation from Department employment.

**Agency Response**

Management concurs with finding 4. The Department will develop formalized procedures to ensure Department records evidence periodic reviews of appropriateness of all ORION and FRVIS user access privileges. Additionally, the Department has implemented processes in ORION and FRVIS requiring deletion of access for Department members within 24 hours of receipt of a separation notice from the Department’s Technical Assistance Center.

**Finding No. 5: Mobile Device Security Controls**

Security controls over mobile device utilization continue to need improvement to ensure the confidentiality, integrity, and availability of Department data and information technology resources.

**Department of Highway Safety and Motor Vehicles  
Response to the Auditor General's Operational Audit  
Preliminary and Tentative Audit Findings**

**Recommendation**

We recommend that Department management enhance certain security controls related to Department and non-Department employee use of mobile devices to ensure the confidentiality, integrity, and availability of Department data and related IT resources.

**Agency Response**

Management concurs with finding 5. The Department will continue to improve security controls related to mobile devices.