



Internal Audit Report

BOCC LeeTran HSMV
Data Exchange Attestation



Report Number: 2019.14
Date: July 30, 2019



BOCC LeeTran HSMV Data Exchange Attestation



To: The Honorable Linda Doggett, Lee County Clerk of the Circuit Court & Comptroller

From: Tim Parks, Chief Internal Audit Officer/Inspector General

Date: July 30, 2019

Re: BOCC LeeTran HSMV Data Exchange Attestation

Dear Ms. Doggett,

The Inspector General Department has completed an audit of BOCC LeeTran HSMV Data Exchange Attestation. Bharat Vallarapu, CIA, CISA, CRISC, CRMA, Senior Internal Auditor conducted this review.

This audit activity conforms to the Institute of Internal Auditor's (IIA) *International Standards for the Professional Practice of Internal Auditing (Red Book)* and the Association of Inspectors General (AIG) *Principles and Standards for Offices of Inspector General (Green Book)*.

The audit client's response is attached to this report. We wish to express our appreciation for the cooperation and assistance provided us by management and staff during this review.

This report will be posted to the Clerk of Courts website, www.leeclerk.org, under Inspector General, Audit Reports. A link to this report has been sent to the Lee County Board of County Commissioners and appropriate parties.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Tim Parks".

Tim Parks, Chief Internal Audit Officer/Inspector General
Inspector General Department

TJP/GK



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Executive Summary

At the request of Lee County Transit (LeeTran) management, the Inspector General Department conducted a review of compliance with the current Memorandum of Understanding (MOU). This MOU establishes the terms and conditions under which Highway Safety and Motor Vehicle (HSMV) provides access to driver license and motor vehicle data to LeeTran.

Our conclusion is that the two Data Exchange users were performing their duties in a professional manner, and data was obtained from HSMV in accordance with the MOU. We believe that the basic controls over access to information with the Data Exchange are appropriate to protect against unauthorized distribution, use, modification, or disclosure.

We recommended that enhancements can be made by developing logging, monitoring, and incident reporting procedures.

Background

LeeTran entered into a Memorandum of Understanding (MOU) with the Florida Department of Highway Safety Motor Vehicles (HSMV) in July 20, 2018. The MOU allows access to data via the Driver's License and Motor Vehicle Database files (Data Exchange). The department uses the Data Exchange to gain access to motor vehicle and driver's license information. This data is utilized to run driver's license checks quarterly to ensure employees have a current valid driver's license. This is critical to LeeTran as their employees are operating County owned vehicles for public transportation purposes.

HSMV required LeeTran to complete a Data Exchange audit on the Data Exchange MOU by July 2019. (7/20/2019)

Objective, Scope, and Methodology

The objective of the attestation was to evaluate the internal controls over personal data obtained from Data Exchange to determine if the controls are adequate to protect the data from unauthorized access, distribution, use, modification, or disclosure.

To accomplish the objective, we:

- Reviewed applicable laws and regulations.
- Interviewed appropriate BOCC LeeTran staff.
- Reviewed policies and procedures.



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- Reviewed the MOU and related documents.

The scope of this attestation included review and evaluation of internal controls for safeguarding personal data to ensure compliance with the HSMV MOU.

The audit methodology was comprised of four steps:

- **Preliminary Risk Assessment:** A meeting was held with management to discuss the audit objective and scope.
- **Planning:** Audit procedures were developed based upon research, audit objective, scope, and the preliminary meetings.
- **Field Work:** The auditor discussed and verified preliminary observations and findings. Manager, IT staff, and employees were interviewed for insight on Operations. Evaluations and tests were conducted on operations and procedures to address and complete the audit fieldwork.
- **Wrap-up:** An Exit Conference was held with management to discuss and obtain responses to the initial audit issues.

Observations and Recommendations

Data Exchange Quality Control Reviews

We noted that there were no written policies and procedures on logging monitoring, and security incidents reporting for the use of Data Exchange and Memorandum of Understanding (MOU) compliance.

Additionally, we noted two concerns that provide the potential for access and misuse of the Data Exchange data files if the users could run the Data Exchange report.

- Data exchange information was not restricted and protected, and there was a potential for unauthorized support personnel to review or retrieve the information. Specifically, several support staff that had access to the File Transfer Protocol (FTP) folder with potential to review or retrieve the Data Exchange files.
- Separated user's access to the Data exchange FTP was not timely removed. The access to the data exchange folder was only removed after the start of the attestation review.

Documented logging and monitoring procedures help management to identify potential misuse and unexplained user access of the Data Exchange data.

Recommendation



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We recommend that LeeTran management:

- Develop logging, monitoring, and incident reporting procedures to address the potential misuse of Data Exchange information and ensure compliance with the MOU requirements.
- Conduct quarterly quality control reviews to ensure all current users are appropriately authorized.



MEMORANDUM

Date: July 30, 2019

To: Tim Parks, Chief Internal Auditor/Inspector General

From: Robert L. Codie, III, Lee County Transit Director

Subject: LeeTran HSMV Data Exchange Internal Control and Security Audit

Thank you for the information contained in the HSMV Data Exchange audit report. The following is in response to the recommendations contained in the report.

Recommendation:

Develop logging, monitoring, and incident reporting procedures to address the potential misuse of Data Exchange information and ensure compliance with the MOU requirements.

Response:

Agreed. LeeTran Policy 300-13: Motor Vehicle Reports has been updated to include logging, monitoring and incident reporting procedures for the data exchange.

Recommendation:

Conduct quarterly quality control reviews to ensure all current users are appropriately authorized.

Response:

Agreed. LeeTran has developed a Quarterly Quality Control Review Report to outline procedures and document the quarterly review of access, reconcile records and ensure there has not been any misuse or unauthorized access.