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October 2, 2014

Ms. Terry L. Rhodes
Executive Director
Department of Highway Safety and Motor Vehicles
2900 Apalachee Parkway B443
Tallahassee, Florida 32399-0500

Re: Auditor General Report No. 2014-183
     Information Technology Operational Audit

Dear Ms. Rhodes:

In accordance with Section 20.055(5)(h), Florida Statutes, we are providing an assessment of the implementation or current status of the recommendations in the Auditor General's Report No. 2014-183.

If you need additional information, please contact me at 617-3104.

Sincerely,

Julie M. Leftheris
Inspector General

cc: Ms. Kathy Dubose, Coordinator, Joint Legislative Auditing Committee

Source of Audit: Auditor General
Report Number: 2014-183
Report Title: Information Technology Operational Audit

Finding No. 1: Data-Entry Procedures

Department data-entry procedures to ensure that all source documents applicable to the Florida Real Time Vehicle Information System (FRVIS) transactions are scanned into FRVIS needed improvement.

Recommendation: The Department should implement a procedure to track and aggregately report on missing supporting documentation that was not scanned into FRVIS to help ensure the completeness and accuracy of FRVIS transactions.

Initial Response: The Department will develop and implement a procedure to improve the identifying and tracking of missing support documentation for FRVIS transactions. This will include notifying agencies that are not in compliance with policies and procedures regarding the reporting of title transactions. The reengineering of the FRVIS application is included in the Department's Motorist Modernization project and additional process improvements to enhance the auditing and tracking of documents will be addressed as a part of this effort.

Six month Response: The Image Review Unit has drafted a quality assurance procedure to review the Missing Image Reports monthly. The reports will be reviewed for any documents that were not properly scanned into FRVIS. The Missing Image Report will be re-run to verify the documents were not received at a later date. A process is in place to identify any title documents that are still missing and the Department plans to provide notice to those responsible. Missing documents received at a later date will be scanned into FRVIS.

Status: Open

Finding No. 2: Appropriateness of Access Privileges

As similarly noted in our report No. 2008-188, some Department employees, contractors, and outside agency employees had inappropriate access to FRVIS as well as FRVIS programs and the FRVIS database that was unnecessary for their assigned job duties and did not enforce an appropriate separation of duties.

Recommendation: The Department should ensure that the access privileges of employees, contractors, and outside agency employees are commensurate with their job duties and enforce an appropriate separation of duties.

Initial Response: The Motorist Services FRVIS Access Authorization Request form will be reviewed upon receipt to determine that the requested roles are needed to perform job duties. Documentation will be retained.

Six month Response: The Motorist Review and Fraud Section developed a standardized role format for tax collector clerks, supervisors, and office managers to use. The role formats detail FRVIS roles normally required for business functions of the three position types. Any role requests received outside of the standardized format will be specifically reviewed and documented by Motorist Review and Fraud Section personnel.

Status: Closed

Finding No. 3: Timely Deactivation of Access Privileges

The Department did not timely deactivate access privileges of some former employees.

Recommendation: The Department should ensure that access privileges of former employees are timely deactivated to minimize the risk of compromising FRVIS data and IT resources.

Initial Response: The Department updated Motorist Services procedures TL-57 and RS-64 effective January 1, 2014 to routinely suspend and/or delete any FRVIS user that has not accessed FRVIS in the previous 90 days. In addition, the Department has reviewed and identified FRVIS user accounts that will be deleted and/or disabled.

Six month Response: The Motorist Services procedures TL-57 and RS-64 have been revised to require a review of all FRVIS users be performed and any users that have not accessed FRVIS in the last 90 days be suspended or deleted. The Motorist Review and Fraud Section is conducting a monthly review to determine any FRVIS users that have not accessed FRVIS in the previous 90 days and suspending or deleting the accounts from FRVIS.

Status: Closed

Finding No. 4: Periodic Review of Access Privileges

The Department had not performed periodic reviews of user access privileges to FRVIS and the FRVIS database.

Recommendation: The Department should perform periodic reviews of user access privileges to FRVIS and the FRVIS database to ensure that user and system account access privileges are authorized and remain appropriate.

Initial Response: The Department will perform a periodic review of user access privileges to FRVIS by providing a list of users and roles for verification to tax collector/agents and department managers.

Six month Response: The Motorist Review and Fraud Section plans to conduct its first annual review of users and roles with tax collector/agents and Department managers to ensure user access privileges to FRVIS are accurate, before the end of 2014.

Status: Open

Finding No. 5: Retention of Access Control Records

Contrary to the State of Florida General Records Schedule GS1-SL retention requirements, the Department did not retain relevant FRVIS access control records related to the deactivation of employee access privileges.

Recommendation: The Department should ensure that relevant FRVIS access control records are retained as required by the General Records Schedule.

Initial Response: Motorist Services Support procedures require the retention of a copy of the FRVIS Access Authorization Request for all new users, change requests, and delete requests as required by the General Records Schedule. As indicated above, the Department did not timely deactivate all former employees and did not retain the associated documentation related to all of the deactivations. In our response to Audit Finding No. 3, the Department updated our procedures to address the timely deactivation of access privileges of former employees and will retain any reports and/or a copy of the FRVIS Access Authorization Requests used to delete access privileges of former employees as required by the General Records Schedule.

Six month Response: The Bureau of Motorist Services Support is retaining all FRVIS Access Authorization and Deactivation Requests and associated documentation on a SharePoint website.

Status: Closed

Finding No. 6: User Authentication and Session Controls

As similarly noted in our report No. 2008-188, certain security controls related to FRVIS user authentication and session controls needed improvement.

Recommendation: The Department should implement appropriate security controls related to certain user authentication and session controls to ensure the continued confidentiality, integrity, and availability of FRVIS data and IT resources.

Initial Response: The Department has begun research and documentation to determine impact and risk to the environment based upon any required changes. Upon completion of the risk assessment, the Department will implement enhanced security controls to address the audit recommendation. The Department has identified administrative features within Oracle that provide more granular security attributes.

Documentation of the findings and a preliminary plan addressing required changes is being developed.

Six month Response: The Department determined that the profile of Oracle users that have the developer role can be modified to implement certain user authentication controls. Effective September 26, 2014, all "developer" users will be assigned the developer role.

Status: Closed

Finding No. 7: Monitoring of FRVIS Database Changes

As similarly noted in our report No. 2008-188, certain IT controls related to the monitoring of FRVIS database changes needed improvement.

Recommendation: The Department should implement appropriate security controls related to monitoring of database changes to ensure the continued confidentiality, integrity, and availability of FRVIS data and IT resources.

Initial Response: As mentioned in Audit Finding No. 6, the Department has identified administrative features within Oracle that provide more granular security attributes. The Department will review their application and database security controls and develop a comprehensive plan to improve security controls. The plan shall be completed within 6 months.

Six month Response: The Division of Information Systems Administration is developing an audit process to address database and application security controls. Beginning in October 2014, a weekly report will be produced and reviewed by Information Systems Administration management to address database process and controls.

Status: Open

Finding No. 8: Program Changes to the FRVIS Production Environment

Department procedures for verification of program changes made to the FRVIS production environment needed improvement.

Recommendation: The Department should implement a mechanism to ensure that all program changes made to the FRVIS production environment are properly approved.

Initial Response: The Department's change management function has established policy, process and procedures, and Change Advisory and Technical Review governance boards to ensure that all changes made to the production environment are recorded, assessed for risk and impact, and released in a controlled manner. We have implemented an industry best practice toolset.

Six month Response: The Department has a governed change management process in place. The Change Management policy outlines all changes to information technology which impact production systems. Required information that aligns with the best practice frameworks is outlined for Risk and Impact Analysis, as well as adequate communication and feedback means for both Information Technology and the business.

Status: Closed

Finding No. 9: Program Change Management Procedures

Department change control procedures for FRVIS were not fully documented.

Recommendation: The Department should enhance program change management procedures to include end-user input, testing, and approvals throughout all phases of the change management process. Also, the Department's procedures should identify staff responsible for development, programming, testing, and implementation.

Initial Response: As mentioned in Audit Finding No. 8, the Department has a change management function supported by a governance process that authorizes projects which require program changes. In addition, the Department's service request system confirms priority on programming tasks, followed by the Departments change management procedures which are fully documented with Technical Review and Change Advisory Boards. Change management receives the output of the User Acceptance Testing (UAT) outlining the authorization given by the business to release the change. A component of the required information for change submission is to identify, test, and back-out plans for both test and production environments. In order for an implementation to be closed, the implementer must provide closure comments as to the success or issues experienced with the change. The change management process then validates through Post Implementation Review (PIR), the overall success or failure of the change. The criteria for PIR completion is outlined in the Change Management Policy Document and is not part of the project closure process.

Six month Response: The Department has a governed change management process in place. Required information that aligns with the best practice frameworks is outlined for end-user input, testing, and approvals throughout all phases of the change management process. Also, the Department's Change Management procedures identify staff responsible for development, programming, testing, and implementation.

Status: Closed