PARKING DEPARTMENT'S DRIVER AND VEHICLE INFORMATION DATABASE (DAVID) AUDIT AUD24-01



Internal Audit

September 25, 2024

City of West Palm Beach Internal Auditor's Office

Beverly Mahaso Esq., CIA, CFE Chief Internal Auditor

Executive Summary



Internal Audit

PARKING DEPARTMENT'S
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OVERVIEW

- The City's Parking Department and the Florida Department of Highway Safety and Motor Vehicles (FLHSMV) entered into a Memorandum of Understanding (MOU) in order for Parking to obtain confidential personal information on drivers and vehicles. This information assists in the issuance and collection of parking citations. The MOU outlines the City's obligations to meet internal controls that were designed to protect confidential information from inappropriate access or use. This audit is a requirement in the MOU for the purpose of confirming compliance with the MOU terms.
- To access the data from the FLHSMV, the Parking Department utilizes an online portal known as DAVID (Driver and Vehicle Information Database). Parking Administration is required to appoint an Agency Point of Contact to administer and perform local services. Examples of these local services include deactivation of terminated users, user access controls, quality reviews, and obtaining acknowledgements of the confidentiality of information.

RESULTS

The Internal Auditor's Office has evaluated the internal controls governing the access and usage of personal data based on the requirements in the MOU and applicable laws. We conclude that:

- The Parking Department met the requirements in the MOU during the audit period.
- The Parking and IT Departments were proactive in establishing an enhanced review and monitoring process. These enhancements along with Management's leadership contributed to the audit results.



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September 25, 2024

Audit Committee City of West Palm Beach 401 Clematis Street West Palm Beach, Florida

RE: Parking Department's Driver and Vehicle Information Database (DAVID) Audit AUD24-01

Dear Audit Committee Members:

Attached is the City of West Palm Beach's Internal Auditor's Office report on the Driver and Vehicle Information Database (DAVID) Audit. This audit was conducted in compliance with a Memorandum of Understanding (HSMV-0261-19 MOU), between the City and the State of Florida that required an internal control and data security audit. Certain disclosures and representations in the body of this report have been made based on the requirements and the work performed.

We thank the management and staff of the Parking Department and the Information Technology Department for their time, assistance, and cooperation during this audit.

Respectfully Submitted,

Beverly Mahaso Chief Internal Auditor

cc: Keith James, Mayor
Faye Johnson, City Administrator
Edward Davis, Parking Administrator
Paul Jones, Chief Information Officer

Contents

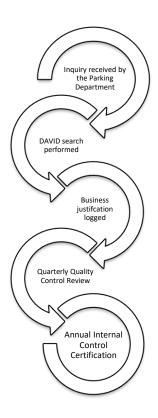
BACKGROUNDBACKGROUND	5
STATEMENT OF SCOPE	5
STATEMENT OF OBJECTIVES	
STATEMENT OF METHODOLOGY	
STATEMENT OF AUDITING STANDARDS	6
AUDIT CONCLUSIONS AND SUMMARY OF FINDINGS	6
NOTEWORTHY ACCOMPLISHMENTS	7
PARKING DEPARTMENT ORGANIZATIONAL CHART	8

Background

The City's Parking Department utilizes personal information that is obtained from the Florida Department of Highway Safety and Motor Vehicles (FLHSMV) to identify or confirm driver or vehicle owner information as related to parking violations. To utilize the data provided, the City and the FLHSMV entered into a Memorandum of Understanding (MOU HSMV-0261-19) that outlines the City's obligation to meet compliance and internal control requirements to ensure that personal information is adequately protected from inappropriate access or use.

To access the data from the FLHSMV, the City and its employees utilize an online portal known as DAVID (Driver and Vehicle Information Database) that is managed by the FLHSMV. While FLHSMV owns and manages the DAVID system, the City is required to appoint an Agency Point of Contact to administer and perform local services. Examples of these local services include deactivation of terminated users, user access reviews, quality control reviews, and obtaining acknowledgements of the confidentiality of information, including criminal sanctions for confidentiality violations.

This audit is a requirement in the MOU agreement, and it was conducted to evaluate the internal controls in place to ensure that data provided or received is protected from unauthorized access, distribution, use, modification, or disclosure. We note that in the MOU, the Parking Department is the primary requesting agency and the Code Enforcement Division is the subrequesting agency. The Parking Department is responsible for ensuring that all users comply with the MOU requirements.



The Code Enforcement Division is within the Police Department. Since the Parking Department does not have authority or oversight over Code Enforcement employees, Code Enforcement's DAVID access was revoked. Code Enforcement now obtains driver and vehicle information from the Police Department.

Statement of Scope

In accordance with MOU HSMV-0261-19, the scope of the audit was to evaluate the internal controls related to DAVID usage and MOU compliance. The period under review was from October 1, 2021, to May 31, 2024. The audit included tests and reviews of policies, procedures, systems, and processes. Other procedures and reviews outside the audit period were conducted as deemed necessary.

Statement of Objectives

The objectives of this audit were to:

- A. Determine whether the internal controls governing the Parking Department's access and usage of DAVID data complied with the requirements in the MOU.
- B. Determine whether there were any additional opportunities for improvement.

Statement of Methodology

The methodologies used to meet the audit objectives included the following:

- Conducting interviews and inquiries of personnel;
- Reviews of relevant agreements, State laws, and internal policies and procedures;
- Evaluating and testing internal controls as related to applicable systems;
- Analyzing data; and
- Other audit procedures deemed necessary.

To the extent possible, testing was conducted on the entire population. However, where sampling was employed, we utilized a statistically valid sample that provided a 95% confidence level with a 5% margin of error. As such, these results may be extrapolated to the entire population.

Statement of Auditing Standards

We conducted this audit in accordance with Generally Accepted Government Auditing Standards (GAGAS). These 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.

Audit Conclusions and Summary of Findings

The following statements are made in response to disclosure requirements within the MOU.

In accordance with MOU HSMV-0261-19, the Internal Auditor's Office has evaluated the internal controls over personal data. The controls appear to be adequate to protect personal data from unauthorized access, distribution, use, modification, or disclosure. As such, we conclude that the Parking Department met the requirements in the MOU during the audit period.

Noteworthy Accomplishments

We found knowledgeable and dedicated employees who were receptive to our prior recommendations for improvement. Specifically, we found that both the Parking and IT Departments were proactive in establishing an enhanced review and monitoring process. These enhancements along with the Parking Department's leadership contributed to the audit results. We commend the departments for their efforts at continuous improvement.

Parking Department Organizational Chart

