TO: Michael Twitty, Pinellas County Property Appraiser
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FROM: Hector Collazo Jr., Inspector General/Chief Audit Executive
Division of Inspector General
DIST: Ken Burke, CPA, Clerk of the Circuit Court and Comptroller
SUBJECT: Continuous Audit of Property Appraiser Employees’ Use of Driver and Vehicle Information Database (DAVID) Personal Data
DATE: March 7, 2019

The Property Appraiser entered into a Memorandum of Understanding (MOU) with the Florida Department of Highway Safety and Motor Vehicles (DHSMV) to access the Drivers License and/or Motor Vehicle Record Data Exchange (DAVE) system. At the Property Appraiser’s request, the Division of Inspector General conducted an attestation engagement on internal controls over DAVE information, and issued a report dated December 15, 2011. One of the results of the engagement was to establish an internal control for the on-going monitoring of Property Appraiser employees’ use of DAVE data. The Property Appraiser requested that the Division of Inspector General assist with implementation of this recommendation and provide monitoring annually.

Effective June 2014, DAVE was replaced by the Driver and Vehicle Information Database (DAVID). DAVID contains the same information as DAVE and includes enhanced functionality. DAVID provides easy to use, secure web-based access to Florida driver information, such as information about driver licenses, driver records, and vehicle titles and registrations. Property Appraiser employees access the DAVID system to obtain pertinent information to carry out duties related to homestead exemptions and mobile
homes. The DAVID system contains confidential personal information protected by Chapter 119 Florida Statutes and the Driver Privacy Protection Act.

DAVID offers the ability to render audit reports that detail user access for a selected time period. Analyzing these reports supports the requirements listed under Section V. “Safeguarding Information” of the MOU.

The scope of our limited audit was to analyze DAVID audit reports for a sample of Property Appraiser employees with the objective to determine if DAVID information was obtained for legitimate business purposes. To meet our objective, we tested, on a sample basis, user DAVID access during the audit period to verify the following:

- The inquiry date and time was within normal Property Appraiser business hours.
- The inquiry was related to a proper business function.
- Repeated searches were appropriate.
- The inquiry was not performed on relatives, celebrities, or political figures.
- Access to Emergency Contact Information was appropriate.

Our limited audit was conducted in accordance with the International Standards for the Professional Practice of Internal Auditing and the Principles and Standards for Offices of Inspector General, and accordingly, included such tests of records and other auditing procedures, as we considered necessary in the circumstances. The audit period was December 1, 2018 through December 13, 2018.

Our testing found that the use of DAVID information was for legitimate Property Appraiser business purposes. However, we noted the DAVID MOU Point of Contact (POC) did not have a complete list of all of the agency’s active DAVID users. Without an accurate list of active users, the POC cannot accurately administer user access to the PAO’s DAVID portal, or effectively attest to the validity of all the queries run through the portal. This issue and our recommendations are noted below.

1. The POC Does Not Have An Accurate List Of PAO DAVID Portal Users.

According to the MOU between the PAO and the Florida DHSMV, the POC is, "A person(s) appointed by the Requesting Party [the PAO] as the administrator of the DAVID program in their agency." One of the roles of the POC is to ensure the DAVID users under their purview solely use the application for business purposes and to do so, the POC needs an accurate list of all of users (active and inactive).

Furthermore, Section V. “Safeguarding Information” of the MOU states:

“F. The Requesting Party shall maintain a list of all persons authorized within the agency to access DAVID information, which must be provided to the providing agency upon request.”

Pursuant to our agreement with the PAO to perform recurring DAVID audits, we have assigned staff to perform the review. The Inspector General (IG) staff is granted DAVID
access in order to run the PAO's DAVID audit reports; consequently, the IG staff should also show on the list of users as active.

At the beginning of this audit, the POC provided us with a list of users (active and inactive). We noted the former IG staff assigned to perform the recurring DAVID audit is not on the list of users; however, she still has access to the PAO's DAVID portal. The POC, being newly appointed, was unaware she had access and could not find her in the system. Additionally, we noted that some of the former PAO users in previous DAVID audits do not appear on the list. Based on the POC's explanation, users cannot be deleted from the system, they can only be deactivated or blocked; therefore, the aforementioned users should be on the users list as inactive. Without the appropriate entitlements, the POC cannot:

- Obtain an accurate list of the PAO's DAVID portal users, active and inactive.
- Effectively oversee and audit user access/usage of DAVID.
- Confidently attest there was no breach or data misuse.

We recommend Management:

A. Ensure the POC obtains the appropriate entitlements/access to the PAO DAVID portal in order to perform duties.

We recommend the PAO DAVID POC:

B. Ensure the PAO DAVID user list is accurate and complete, to include all active and inactive users from all three agencies of the PAO DAVID portal.

C. Compare the complete current user list to the old user list to identify any current active users that the POC was unaware of, who have access to the PAO DAVID portal.

D. Audit the queries run by current active users the POC was unaware had access to the PAO DAVID portal to ensure queries were for a legitimate business purpose.

Management Response:

A. Management Concurs. The Property Appraiser contacted DAVID support and the PAO DAVID case manager multiple times to troubleshoot access for the PAO POC. The Property Appraiser will continue to contact DAVID personnel until proper access is granted.

B. Management Concurs. Upon being granted access to all PAO DAVID portals, the PAO POC will review the complete user list for all three agencies.

C. Management Concurs. The PAO POC will complete this task upon gaining access through DAVID support.
D. Management Concurs. The PAO POC will perform an extended audit beyond three months on any users it was previously unaware of during the quarterly internal audit.

We appreciate the cooperation shown by the staff of the Property Appraiser’s Office during the course of this review.