



# Angelina “Angel” Colonnese

CLERK OF THE CIRCUIT COURT AND COMPTROLLER OF MANATEE COUNTY

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Internal Audit Department

Manatee County Parks and Natural Resources Department

## Data Exchange MOU Attestation

DHSMV Driver and Vehicle Information Database (DAVID)

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April 10, 2017

Audit No. 21710100



# Angelina “Angel” Colonnese

CLERK OF THE CIRCUIT COURT AND COMPTROLLER OF MANATEE COUNTY

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## MEMORANDUM

TO: Charlie Hunsicker, Parks and Natural Resources Department Director 

FROM: Angelina “Angel” Colonnese, Clerk of the Circuit Court and Comptroller

DATE: April 10, 2017

RE: Data Exchange (DAVID) MOU Attestation Engagement

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We have evaluated the Parks and Natural Resources Department’s internal controls over the use of the Florida Department of Highway Safety and Motor Vehicles’ (DHSMV) Driver and Vehicle Information Database (DAVID) for the purpose of providing an attestation to the DHSMV. The requirements for the attestation are specified in the Data Exchange Memorandum of Understanding (MOU) (HSMV-0260-17) between the Parks and Natural Resources Department and DHSMV.

Based on our evaluation of the access and use of DAVID, it appears that the Manatee County Parks and Natural Resources Department has adequate internal controls in place to properly protect the personal data from unauthorized access, distribution, use, modification, or disclosure. Opportunities for improvement identified during test work have been discussed with management and incorporated in this report.

Attached is a completed DAVID Audit worksheet/guide and Attestation Statement to be signed by you and submitted to the DHSMV by April 17, 2017, as per their email dated October 18, 2016.

We appreciate the cooperation of the management and staff throughout this engagement and commend them for their efforts and timeliness in addressing the issues raised.

“Pride in Service with a Vision to the Future”

Clerk of the Circuit Court – Clerk of Board of County Commissioners – County Comptroller – Auditor and Recorder

MANATEE COUNTY CLERK OF THE CIRCUIT COURT  
INTERNAL AUDIT DEPARTMENT

PARKS AND NATURAL RESOURCES DEPARTMENT  
DATA EXCHANGE (DAVID) MOU ATTESTATION

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MANATEE COUNTY CLERK OF THE CIRCUIT COURT  
INTERNAL AUDIT DEPARTMENT

PARKS AND NATURAL RESOURCES DEPARTMENT  
DATA EXCHANGE (DAVID) MOU ATTESTATION

The Internal Audit Department has evaluated the Parks and Natural Resources Department's use of the Florida Department of Highway Safety and Motor Vehicles' Driver and Vehicle Information Database (DAVID). The engagement was limited to an evaluation of the internal controls to protect the personal data obtained from the DAVID database from unauthorized access, distribution, use, modification, or disclosure.

**BACKGROUND**

Chapter 705 of the Florida Statutes authorizes the County to remove lost or abandoned vessels from County waters. As a result, the County enacted Ordinance 05-16 and Resolution R-05-98 to designate the County's Environmental Program Manager and staff as the Code Enforcement Officers responsible for removing these vessels. Currently, the Environmental Program Manager and staff are in the Natural Resources Division of the Parks and Natural Resources Department.

In order to enforce the ordinance, ownership information must be obtained, so the owner can be notified and the responsibility for removal can be determined. The vessel ownership information is maintained in DAVID, the Florida Department of Highway Safety and Motor Vehicles' (DHSMV) web-based database. DHSMV grants access to DAVID through a Data Exchange Memorandum of Understanding (MOU). In June 2010, the Parks and Natural Resources Department entered into their first MOU with DHSMV. The current MOU is in effect from February 15, 2017 through February 14, 2023.

On October 18, 2016, Parks and Natural Resources was notified by the DHSMV, via email, that the agency was randomly selected to submit an attestation to the DHSMV ensuring that the data obtained from DAVID is being used in an appropriate manner.

**PURPOSE/OBJECTIVES**

The purpose/objectives of this engagement included:

- evaluating the internal controls over the personal data in order to determine whether they are adequate to protect that data from unauthorized access, distribution, use, modification, or disclosure;
- completing the DAVID Audit worksheet/guide provided by the DHSMV to be used during the evaluation, and required to be submitted to the DHSMV with the Attestation Statement;
- producing an Attestation Statement to be submitted to the DHSMV, as requested.

**SCOPE**

The scope of this engagement was limited to analyzing access and use of DAVID by employees of the Parks and Natural Resources Department for the week ended November 6, 2016.

## RESULTS

Based on our evaluation of the Parks and Natural Resources Department's DAVID activity for the week ending November 6, 2016, it appears that users have been accessing the database for business purposes only, as specified in the MOU. The users are aware of the confidential nature of the information obtained from DAVID and understand they may not disseminate or disclose this information to unauthorized users. In addition, all of the signed user acknowledgement statements are in current status, as required by the MOU.

During testing, we did identify one area where an improvement could be made to ensure compliance with the MOU. This minor finding is *not* considered to be a significant control weakness that would affect the security over personal data obtained from DAVID.

According to section IV.B.9 of the MOU, quarterly quality control reviews are to be conducted to ensure all current users are appropriately authorized. According to the DAVID Administrator, formal quarterly reviews have not been done, as the Parks and Natural Resources Department has only three authorized users. For 2016, an annual review was performed of all 2016 activity; no unauthorized use noted. The current MOU, effective 2/15/17, provides a pre-formatted report for these reviews, along with more detailed instructions and requirements. Management will begin performing and documenting the quarterly reviews beginning in 2017.

*We support management's plan to complete and maintain the Quarterly Quality Control Review Report provided by DHSMV on a quarterly basis.*

## CONCLUSION

Based on our evaluation of the access and use of DAVID, it appears that the Parks and Natural Resources Department has adequate internal controls in place to properly protect the personal data from unauthorized access, distribution, use, modification, or disclosure.