

**MOBILITY DEPARTMENT  
PARKING DIVISION  
FLHSMV DATA EXCHANGE MOU  
AUDIT 25-06  
NOVEMBER 21, 2024**



**City of Tampa**  
*Jane Castor, Mayor*

**Internal Audit Department**

315 E. Kennedy Boulevard  
Tampa, Florida 33602  
Office (813) 274-7159

November 21, 2024

Honorable Jane Castor  
Mayor, City of Tampa  
1 City Hall Plaza  
Tampa, Florida

RE: Memorandum of Understanding for Driver's License And / Or Motor Vehicle Record Data Exchange, Audit 25-06

Dear Mayor Castor:

Attached is the Internal Audit Department's report on the Florida Highway Safety and Motor Vehicles Data Exchange Memorandum of Understanding (MOU).

The internal controls governing the use and dissemination of personal data have been evaluated considering the requirements of the MOU and applicable laws. Based on this review, the internal controls are adequate to protect the personal data from unauthorized access, distribution, use, modification, or disclosure. The internal controls evaluated included "data security policies/procedures in place for personnel to follow and data security procedures/policies in place to protect personal data." Internal Audit certifies that the data security procedures/policies have been approved by a Risk Management IT Security Professional. Additionally, "all deficiencies/issues found during the audit have been corrected and measures enacted to prevent recurrence."

We thank the management and staff of the Parking Division for their cooperation and assistance during this audit.

Sincerely,

/s/ Christine Glover

Christine Glover, MS, MBA, CIA, CFE, CGAP  
Internal Audit Director

cc: John Bennett, Chief of Staff  
Jean Duncan, Administrator of Infrastructure and Mobility  
Dennis Rogero, Chief Financial Officer  
Vik Bhide, Mobility Director  
Eric Hayden, Chief Technology Officer  
Fed Revolte, Parking Division Manager  
Meghan Birnholz-Couture, Assistant City Attorney

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Vivian N Walker, MPA, CGAP, CICA  
Lead Senior Auditor

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Christine Glover, MS, MBA, CIA, CFE, CGAP  
Audit Director

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Honorable Jane Castor  
Mayor

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**BACKGROUND**

The Parking Division (Division) of the Mobility Department is responsible for the operation of all City of Tampa (City) public parking. The Division develops parking policy and specific facility expansion plans to serve the parking demand in the central business district and adjacent commercial areas. The Division's processes require an exchange of information; motor vehicle tag information is forwarded to the Florida Department of Highway Safety and Motor Vehicles (FLHSMV) and data is accessed from the Driver and Vehicle Information Database (DAVID).

Pursuant to Section VII., Compliance and Control Measures, Part A, Internal Control and Data Security Audit, Memorandum of Understanding (MOU) between the FLHSMV and the Division, continued access to personal data was contingent upon the Division having appropriate internal controls in place to protect data received from "unauthorized access, distribution, use, modification or disclosure."

**STATEMENT OF OBJECTIVES**

This audit was conducted upon the request from the Management of the Infrastructure and Mobility Department. The objectives of the audit were to assess that:

1. Internal controls, including data security policies and procedures, are in place and deemed adequate to ensure the use and dissemination of personal data are protected from "unauthorized access, distribution, use, modification, or disclosure."
2. Data security procedures/policies have been approved by a Risk Management IT Security Professional with the required credentials.
3. Employee access is appropriate for job responsibilities and is routinely monitored.
4. Data obtained from DAVID was for a valid reason.
5. The City complied with the requirements of the internal control attestation statement of the DAVID MOU.

**STATEMENT OF SCOPE**

The audit period covered DAVID user activity that occurred from March 2023 through September 2024. A data reliability analysis for completeness of information generated by DAVID was performed during the previous audit (21-04 Parking Data Exchange). Original records as well as copies were used as evidence and verified through observation and physical examination.

## **STATEMENT OF METHODOLOGY**

The following steps were performed to determine compliance with the stated objectives:

- Interviewed both the Parking Division Manager and the City's Security Officer.
- Reviewed the system of internal controls related to personal information obtained through the DAVID system.
- Reviewed data security protocols and other information security documentation to evaluate compliance with cybersecurity requirements.
- Reviewed authorized DAVID user list to ensure only current Division employees have access.
- Reviewed multiple users access to DAVID and traced to supporting documentation of parking violations.
- Reviewed documentation maintained to support periodic monitoring of user access by Parking Division personnel.

## **STATEMENT OF AUDITING STANDARDS**

We conducted this performance audit in accordance with generally accepted government auditing standards. Those 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**

Based upon the test work performed, we conclude that:

1. Internal controls, including data security policies and procedures, are in place and deemed adequate to ensure the use and dissemination of personal data are protected from "unauthorized access, distribution, use, modification, or disclosure."
2. Data security procedures/policies have been approved by a Risk Management IT Security Professional with the required credentials.
3. Employee access is appropriate for job responsibilities and is routinely monitored.
4. Data obtained from DAVID was for a valid reason. However, documentation to support compliance needs to be enhanced.
5. The City complied with the requirements of the internal control attestation statement of the DAVID MOU. However, the documentation to support compliance can be enhanced.

## **QUARTERLY QUALITY CONTROL REPORTS**

**STATEMENT OF CONDITION:** The documentation to support compliance with the quarterly quality control reporting requirement in the DAVID MOU needs to be improved. Specifically, the following observations were made:

- Only three of six quarterly quality control reports could be located. Additionally, those three reports had been prepared more than 10-days after the end of the quarter.
- There were 10 of 33 times when DAVID was accessed but there was no related citation issuance or other driver related infraction located in the citation system used by the Parking Division.

**CRITERIA:** The DAVID MOU, Attachment I, establishes the use by the City as being “For notifications of parking violations and associated court summonses.” Additionally, Section VI.A. Quarterly Quality Control Review Report of the MOU requires the completion within “ten (10) days after the end of each quarter.”

**CAUSE:** Division Management indicated there are instances of needing to access DAVID outside of citation issues. For example, if a manual citation has an illegible vehicle tag, DAVID would be accessed to search on the address. However, there is no record kept supporting these instances. The employee currently preparing the quarterly reports indicated an unawareness of the 10-day requirement.

**EFFECT OF CONDITION:** Non-compliance with the MOU could lead to the State of Florida terminating access to DAVID and/or fines for misuse of personal information.

**RECOMMENDATION:** Division Management should establish a process to capture the details of all instances when DAVID is accessed for reasons other than “parking violations and associated court summonses.” Additionally, the quarterly reports should be prepared within the 10-day window required and all supporting documentation maintained with the report.

**MANAGEMENT RESPONSE:** Agree. A search log has been created for the team to input one off license plate search. A calendar reminder is set for the quarterly audit to ensure the 10-day required is met.

**TARGET IMPLEMENTATION DATE:** Implemented on 11/4/2024