December 17, 2008

Ms. Electra Theodorides Bustle, Executive Director
Department of Highway Safety and Motor Vehicles
2900 Apalachee Parkway B443
Tallahassee, Florida 32399-0500

Re: Auditor General Report No. 2008-188
        Florida Real Time Vehicle Information System Audit

Dear Ms. Theodorides-Bustle:

In accordance with Section 20.055(5)(h), Florida Statutes, we are providing an assessment of the implementation or current status of each recommendation in the Auditor General's Report No. 2008-188. If you need additional information, please contact me at 617-3104.

                    Sincerely,

                    Laurence W. Noda

                    Laurence W. Noda, CPA
                    Inspector General

    c: Mr. Terry L. Shoffstall, Staff Director
        Joint Legislative Auditing Committee

    Attachment

Finding No. 1: Change Management Controls

Our audit disclosed aspects of the Department's change management controls for FRVIS that needed improvement. Specifically:

- Authorizations of changes were not consistently documented and maintained. According to the Department's ISA Data Center Work Request Orders, Procedure Number 013, requests for programming services were to be submitted to ISA on a Work Request Order (WRO) form. WROs were to be used to document programming service requests and related approvals. However, some programming service requests did not have corresponding WROs. The programming service requests that lacked WROs either required less than 8 hours of work, were the result of an enhancement list, or were a reported production error. Under these conditions, there is an increased risk that unauthorized or erroneous changes could be moved into the production environment without timely detection.

- FRVIS system documentation and program code revision logs or comments within the program code were not consistently updated to reflect program changes. This increased the Department's risk that changes to the system may not be adequately understood, thus making the system more difficult to maintain.

- It was the Department's practice to have the developer modify and implement middleware changes into the host production database. Additionally, developers implemented changes to host procedure libraries that contained frequently used job control language. Under these conditions, there is an increased risk that unauthorized or erroneous changes could be moved into the production environment without timely detection.

Recommendation: The Department should enforce effective change management controls that include authorization documentation, updated system documentation, and program revision logs or comments within the program code for all program changes to FRVIS. The Department should also restrict developers from making changes to the host production database and separate the responsibilities for developing and moving program changes to the host production environment.

Six-Month Status:

The Department has developed a detailed action plan and completed multiple initiatives to enforce effective change management process controls to ensure separation of duties and the consistent logging of changes to the production environment.   We will rewrite the Information System Development Methodology (ISDM) to include guidelines and standards for change management controls for all software developers by July 1, 2009.

We have also refined the work order process to require logging of requests of eight hours or less, including program corrections. Software release notes are prepared and distributed by the business areas, with input from ISA. A training session was held with all software development managers to communicate these requirements for documentation and work request orders. We are reviewing and refining the work request process to ensure the proper controls are in place and work can be tracked effectively. The importance of system documentation has been reinforced; however a formal procedure to address these issues will be included in the new ISDM.

Furthermore, we have restricted developers from making changes to the production database and have separated the responsibilities for developing and moving program changes to the production environment. The developers no longer have update access to production data or code and must request and coordinate code moves with Production Control, which provides an audit trail. This change was implemented in October 2008.

The issues still outstanding are:

- Development of a process to ensure that stored procedure moves to production will no longer be performed by Developers, and will be accomplished by a separate group. This is currently planned following the next major software release, which is scheduled for January 2009; and
- Development of a new ISDM, planned for completion no later than July 1, 2009.

Finding No. 2: Security Controls

Security controls are intended to protect the integrity, confidentiality, and availability of data and IT resources. During our audit, we identified certain Department security controls related to FRVIS that needed improvement. Specific details of these issues are not disclosed in this report to avoid the possibility of compromising Department data and IT resources. However, appropriate Department staff have been notified of the specific issues. Without adequate security controls, the integrity, confidentiality, and availability of data and IT resources may be compromised, increasing the risk that Department data and IT resources may be subject to improper disclosure, destruction, or modification.

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

Six-Month Status:

The Department has addressed the confidential recommendations related to the FRVIS audit to ensure the continued protection of Department data and IT resources. Most items are complete, with a few remaining items still in process and planned for completion in the first half of 2009. The Inspector General has been provided the list of items, responsible party, and target completion dates. These high priority initiatives further strengthen specific security-related controls in the areas discussed. The Department recognizes integrity, confidentiality, and availability of the Department's data and information technology resources as a key responsibility in maintaining the automated systems that serve the public in the areas of motorist services.

Finding No. 3: Assessment of License Taxes and Credits

Our audit disclosed instances where FRVIS incorrectly assessed certain license taxes and credits. Although the monetary amount of the incorrect assessments was not material to the overall revenue recorded by FRVIS, the instances noted required corrective action by the Department to ensure compliance with the provisions of State law.

Recommendation: The Department should make appropriate FRVIS changes to ensure the accuracy of FRVIS processing and the license taxes assessed to taxpayers.

Six-Month Status:

Changes to FRVIS code were implemented June 28, 2008 to account for the incorrect fee schedule entry for wreckers of a certain gross vehicle weight and to ensure that the base tax fee assessment on an original transaction is never less than $5.00.

To clarify the intent of the legislature regarding the proration of vessel fees, the Department is proposing legislation in the 2009 session to modify Florida Statute 328.72 to allow vessel registration fees to be prorated on a monthly basis when the registration period is other than 12 or 24 months.