



# Audit of Office of Building Services – 2021 DAVID Usage

## **Inspector General Department** **Gary J. Cooney, Clerk of the Circuit Court & Comptroller** **Audit Report**

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**Inspector General**

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**November 4, 2021**



**Inspector General Department**

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Board of County Commissioners

The annual audit of internal controls over the Office of Building Services' access to the Driver and Vehicle Information Database (DAVID) of the Florida Department of Highway Safety and Motor vehicles is complete and no significant issues were identified. Observations are included in this report.

This is the annual and final report, as Building Services decided to terminate DAVID access. We appreciate the cooperation and assistance provided by the Office of Building Services during the course of this audit.

Respectfully submitted,

Terri W. Freeman  
Inspector General

cc: Gary J. Cooney, Clerk of the Circuit Court & Comptroller  
Denise Bell, Chief Deputy Clerk  
Jennifer Barker, Interim County Manager  
Brandon Matulka, Executive Director of Economic Growth  
Tom Allen, Director, Office of Building Services

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# Scope and Objective

The audit objective was to assess whether internal controls are sufficient to protect personal data obtained from the Florida Department of Highway Safety and Motor Vehicles' (FLHSMV) Driver and Vehicle Information Database (DAVID) from unauthorized access, distribution, use, modification, or disclosure.

The audit included discussions with management and staff, tests of records, and other auditing procedures necessary to determine whether Building Services met requirements, as defined in the Memorandum of Understanding (MOU) from January 1, 2021, through September 15, 2021.

# Overall Conclusion

The internal controls are well designed and largely function as intended.

Observations are included in this report.

# Background

DAVID is a tool that law enforcement and criminal justice officials use to access current driver and vehicle information. The Office of Building Services uses DAVID to search for up-to-date contractor contact and licensing information and to inquire about abandoned property. To remain in compliance with the MOU, the use of DAVID and its data must be conducted in a professional manner and user activity reviews are to be conducted on a continuous basis. Incidents of misuse must be reported promptly to the FLHSMV.

# Observations

## 1. DAVID User Access

- A. One Building Services employee resigned on 2/5/2021 and was not deactivated from the database until 2/11/2021, six business days after termination. The MOU, Section IV.B.8, states that Building Services should “Immediately inactivate user access/permissions following termination or the determination of negligent, improper, or unauthorized user or dissemination of information. Update user access/permissions upon reassignment of users within five (5) business work days.”

Since DAVID is a cloud-based system, there is a risk that a terminated employee could access the system off-site and improperly use data without reprimand or consequence.

**Agreed Upon Action Plan:** Building Services terminated DAVID access on 9/13/2021.

**Target Completion Date:** Completed.

- B. One Building Services employee had not accessed DAVID since 8/31/2018. The MOU, section V.A. states, “Information exchanged will not be used for any purposes not specifically authorized by this MOU. Unauthorized use includes, but is not limited to, queries not related to a legitimate business purpose, personal use, or dissemination, sharing, copying, or passing of this information to unauthorized persons.”

There is a risk the employee, who no longer had a business need for ongoing access, would access to the system for illegitimate purposes.

**Agreed Upon Action Plan:** Management will create a process that directs each DAVID user to log into the system at least once per year in order to take the annual DAVID exam and indicate that the user still needs access to the system by 5/1/2021.

**Target Completion Date:** Completed.

## **2. Signing Authority of the Memorandum of Understanding**

A delegation of authority was not authorized by the County Manager for Building Services management to sign the 2016 FLHSMV MOU. According to the FLHSMV, the signor for the County must be authorized to enter into contracts on behalf of the agency. Building Services management does not have the authority on its own to enter a contract on behalf of the BCC.

There is a risk that the MOU is a voidable contract.

**Agreed Upon Action Plan:** Building Services terminated DAVID access on 9/13/2021.

**Target Completion Date:** Completed.