OFFICE OF THE DIRECTOR
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June 30, 2009

Karen Roye, Director
Department of Child Support Services
San Francisco County Office
617 Mission Street
San Francisco, CA 94105

Audit File: C-90-9101

Dear Ms. Roye:

The Department of Motor Vehicles' (DMV) Audits Office has concluded the audit of the Department of Child Support Services San Francisco county office (DCSS San Francisco). We based our review on the requirements stipulated in the Memorandum of Understanding (MOU) DMV via Health and Human Services Agency Data Center (HHSDC) applicable statutes and regulations stated in the California Vehicle Code and the California Code of Regulations. We conducted an on-site audit at the Junction Avenue location on May 7, 2009.

This audit covered the period March 1, 2008 through March 30, 2009. The audit was performed in accordance with the Standards set forth in the General Accounting Office's *Generally Accepted Government Auditing Standards.* The objectives of the audit were to determine if DCSS San Francisco:

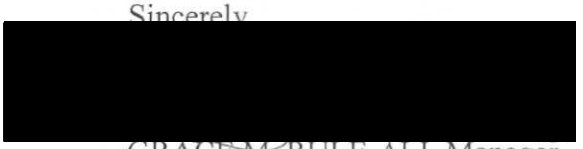
- Internal controls are adequate to safeguard information obtained from DMV;
- Complies with the provisions of the MOU HHSDC dated February 21, 2003;
- Adheres to applicable rules and regulations governing the processing, storage, and transmission of DMV information.

DMV Information Services Branch (ISB), who has jurisdiction over government requester accounts, and the California State Department of Child Support Services will receive copies of the attached report.

We thank DCSS San Francisco and their staff for the cooperation and courtesy

extended to our auditor during this review. If you have any questions about this audit, please contact Grace Rule-Ali at (916) 657-5828.

Sincerely



GRACE M. RULE-ALI, Manager
Information Systems-Requester Audit Section
(916) 657- 5828

Attachment

cc: Joan Obert, Director, State DCSS
Jeanne Benuzzi, DMV Acting Chief, ISB
Tam Le, DMV Manager, ISB Policy & Information Privacy Section

CALIFORNIA DEPARTMENT OF MOTOR VEHICLES
EXECUTIVE AUDITS
DEPARTMENT OF CHILD SUPPORT SERVICES
SAN FRANCISCO OFFICE
AUDIT REPORT
C-90-9101

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EXECUTIVE SUMMARY

The California Department of Motor Vehicles (DMV) Information Services Branch (ISB) operates an information requester program that allows external entities to access DMV records pursuant to applicable statutes of the California Vehicle Code (CVC) and California Code of Regulations Title 13, Article 5 except as prohibited by CVC Section 1808.21. As an authorized DMV Government Requester Account holder the Department of Child Support Services San Francisco County (DCSS San Francisco) has access to basic record and address information on California Driver License and Vehicle Registration. In accordance with its DMV Government Requester Account agreement, DCSS is allowed to make California DMV inquiries for its business needs.

The CVC mandates that DMV protect the privacy rights of the public by releasing only certain information authorized by statutes. Statutes and regulations allow for businesses and individuals to access DMV records containing both confidential and non-confidential information, contingent upon approval of an application and compliance with the program requirements. DMV is dedicated in its mission of securing personal information for consumer protection. To meet our obligation of protecting the public and DMV information, we reviewed DCSS' compliance with the DMV Government Requester Account stipulations, and applicable California laws and regulations.

Our evaluation found that DCSS San Francisco is a member of the Computer Assisted Support Enforcement Systems (CASES) Consortium. The CASES Consortium consists of 54 DCSS county member agencies authorized since July 2002 for on-line access to DMV records. While the California DCSS oversees the county member agencies in this process, CASES Consortium will be disbanded effective June 30, 2009. This will require county agencies, who wish to do so, obtain a new method for on-line access, or rely on the existing overnight batch processing to receive DMV information.

Our evaluation found that the current security controls in effect at DCSS San Francisco as of May 11, 2009, are sufficient to meet the security objectives of this audit.

BACKGROUND

DMV is responsible for administering statewide programs that use and rely on information assets whether they are electronically stored or hard copy documents. DMV conducts audits and evaluations of entities accessing the information of the Department for compliance purposes.

In June 2002 statutory changes reshaped the California child support program. The local county child support agencies (LCSA) were no longer considered law enforcement agencies and had to change the access methods to obtain data from DMV.

Formerly, LCSA requested access to DMV's databases via CLETS. Effective July 1, 2002, due to the June statutory changes, DMV granted approval to allow CASES Consortium electronic

access to data from its files via the existing Health and Human Services Data Center. The Consortium consisted of 54 LCSA. DMV's approval was granted with the condition that the appropriate access, logging and auditing controls are in place. The requester codes have the following access to DMV information:

- Driver license – to locate individuals in the effort to establish and enforce child support obligations.
- Vehicle registration – to locate individuals in the effort to establish and enforce child support obligations.

DCSS county agencies use their requester codes to access California Driver License and Vehicle information to locate absent parents in order to secure child support for the child. The DCSS San Francisco County has on-line access as a member of the CASES Consortium.

OBJECTIVES, SCOPE, AND METHODOLOGY

The objectives of the review were to determine if DCSS Santa Clara:

- Internal controls are adequate to safeguard information obtained from DMV,
- Complies with the provisions of the MOU, and
- Adheres to applicable rules and regulations governing the processing, storage, and transmission of DMV information

The audit was performed in accordance with *Government Auditing Standards*, Generally Accepted Auditing Standards, the California Department of Motor Vehicles' Government Requester Account Requirements and applicable California laws and regulations.

Our evaluation methodology included such tests as considered necessary to meet our objectives. Interviews were conducted with DCSS management, physical observation of the DCSS Santa Clara facility made to determine the levels of security, and confidentiality over DMV information.

OBSERVATION

As a service to DCSS customers, San Francisco DCSS employees make inquiries to determine status of driver license suspensions. At this time, DCSS is not approved for this purpose. To prevent inappropriate access to DMV files DCSS San Francisco should develop guidelines and communicate its policy to users on the appropriate reasons for making a DMV inquiry.

CONCLUSION

Department of Child Support Services San Francisco County operates a system and program that permits its employees access to DMV information, and provides assurance that access to the information is appropriately controlled and monitored in accordance with the requirements of its Government Requester Account. The mechanisms and controls in place to protect information received from DMV are sufficient and functioning properly to fulfill the program objectives. Because of inherent limitations in control systems, errors or irregularities may occur and not be detected. Consequently, projection of any evaluation of systems to future periods is subject to risk since procedures may become inadequate because of changes, or the degree of compliance with procedures may deteriorate.

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May 20, 2009

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