



**Audit of Admissions Operations' Internal
Controls Over Personal Data Pursuant to
Florida Department of Highway Safety
and Motor Vehicles Contract Number
HSMV-0910-16**

**Report No. 21/22-09
June 30, 2022**

FIU | Office of Internal Audit

FLORIDA INTERNATIONAL UNIVERSITY

Date: June 30, 2022

To: Kevin Coughlin, Jr., Vice President of Enrollment Management and Services
Vanessa Merine, Director, Enrollment Services

From: Trevor L. Williams, Chief Audit Executive



Subject: Audit of Admissions Operations' Internal Controls Over Personal Data Pursuant to Florida Department of Highway Safety and Motor Vehicles Contract Number HSMV-0910-16, Report No. 21/22-09

Pursuant to your request, we have performed an audit of the adequacy of internal controls over personal data maintained by the Office of Admissions Operations, previously known as Enrollment Processing Center. Based on our evaluation, we have concluded that your system of controls is adequate to protect personal data from unauthorized access, distribution, use, modification, or disclosure.

Background

In May 2016, Florida International University (FIU) on behalf of the Enrollment Processing Center, hereinafter Office of Admissions Operations ("Admissions Operations") entered into a Memorandum of Understanding (MOU) with the Florida Department of Highway Safety and Motor Vehicles (DHSMV), allowing Admissions Operations electronic access to driver license and motor vehicle data from the DHSMV through their Driver and Vehicle Information Database (DAVID). Admissions Operations uses the data to verify student information submitted for initial residency classification for tuition purposes as part of the admissions process at FIU. The six-year agreement expired on May 18, 2022, and was renewable. However, the University requested a new MOU from the DHSMV.

According to Section VI, Part B, of the MOU, the agreement is contingent upon Admissions Operations having appropriate internal controls in place at all times that data is being provided/received pursuant to the MOU to ensure that the data is protected from unauthorized access, distribution, use, modification, or disclosure. In furtherance of this requirement, the DHSMV requested FIU to submit an attestation from either a certified public accounting firm or its internal auditor, prior to executing a new MOU.

Objectives, Scope, and Methodology

Our audit of the adequacy of internal controls over personal data maintained by Admissions Operations was conducted in accordance with the DAVID Audit guide provided by the DHSMV which also served as a basis for our completion of the Attestation Statement. The DAVID audit guide provided the framework for assessing the adequacy internal controls in place over personal data being provided/received pursuant to the MOU based upon 14 internal control-related questions.

During the audit, we reviewed the MOU, conducted interviews, obtained and reviewed procedures, and tested selected transactions to satisfy our audit objectives. The audit was conducted in conformance with the *International Standards for the Professional Practice of Internal Auditing* and included tests of the processes, systems, and controls, and such other auditing procedures as we considered necessary under the circumstances. Audit fieldwork was conducted during June 2022.

Conclusion

We concluded that based upon the procedures performed and the results obtained, that the internal controls over personal data obtained or received by Admissions Operations through DAVID are adequate to protect the personal data from unauthorized access, distribution, use, modification, or disclosure and in compliance with the MOU. In addition, to the extent we found any deficiencies or issues during the audit, any and all such deficiencies or issues would have been reported and corrected by Admissions Operations, and measures would have been enacted to prevent recurrence, as required by the MOU. We found no such deficiencies or issues.

Attachment: Attestation Statement

C: FIU Board of Trustees

Kenneth A. Jessell, Interim University President

Elizabeth M. Bejar, Interim Provost, Executive Vice President, and Chief Operating Officer

Aime Martinez, Interim Chief Financial Officer and Vice President for Finance and Administration

Javier I. Marques, Vice President for Operations & Safety and Chief of Staff, Office of the President



Terry L. Rhodes
Executive Director

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ATTESTATION STATEMENT

Contract Number HSMV-0910-16

In accordance with Section VI., Part B, of the Memorandum of Understanding between **Department of Highway Safety and Motor Vehicles** and FL International University - Enrollment Processing Center (Requesting Party) this MOU is contingent upon the Requesting Party having appropriate internal controls in place to ensure that data provided/received pursuant to this MOU is protected from unauthorized access, distribution, use, modification, or disclosure. The Requesting Party must submit an Attestation Statement from their Agency's Internal Auditor, Inspector General, Risk Management IT Security Professional, or a currently licensed Certified Public Accountant, on or before the third and sixth anniversary of the agreement or within 180 days from receipt of an Attestation review request from the Providing Agency. The Attestation Statement shall indicate that the internal controls over personal data have been evaluated and are adequate to protect the personal data from unauthorized access, distribution, use, modification, or disclosure. The Attestation Statement shall also certify that any and all deficiencies/issues found during the review have been corrected and measures enacted to prevent recurrence. The Providing Agency may extend the time for submission of the Attestation Statement upon written request by the Requesting Party for good cause shown by the Requesting Party.

FL International University - Enrollment Processing Center (Requesting Agency) hereby attests that the Requesting Party's controls were evaluated as required in Section VI. Part B of the MOU and the controls are adequate to protect personal data from unauthorized access, distribution, use, modification or disclosure, and is in full compliance with requirements of the contractual agreement. Furthermore, any and all deficiencies/issues found during the review were corrected and measures enacted to prevent recurrence.

The above evaluation was conducted by Requesting Party's ☒ Internal Auditor; ☐ Inspector General; ☐ Risk Management IT Security Professional; ☐ Currently licensed Certified Public Accountant, identified below as the Auditor.

DocuSigned by:

VANESSA MERINE

Signature of Authorized Official or
Delegated Official with letter of Authority

Vanessa Merine

Printed Name

Director, Admissions Operations

Title

June 29, 2022

Date

DocuSigned by:

Trevor L. Williams

Signature of Auditor

Trevor L. Williams

Printed Name

Chief Audit Executive

Title

June 29, 2022

Date

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APPENDIX I – OIA CONTACT AND STAFF ACKNOWLEDGMENT:

OIA contact:

Joan Lieuw 305-348-2107 or jlieuw@fiu.edu

Contributors to the report:

In addition to the contact named above, the following staff contributed to this audit in the designated roles:

Manuel Sanchez (auditor in-charge);
Henley Louis-Pierre (IT assistant);
Trevor Williams (supervisor and reviewer); and
Vivian Gonzalez (independent reviewer).

Definition of Internal Auditing

Internal auditing is an independent, objective assurance and consulting activity designed to add value and improve an organization's operations. It helps an organization accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of risk management, control, and governance processes.