

Document Validation Unit Audit Report 202223-19

February 14, 2024

Executive Summary

Sections 322.08 and 322.051 Florida Statutes (F.S.), require that applicants must provide proof of identity and United States (U.S.) citizenship or legal presence when applying for a Florida driver's license (DL), or identification card (ID). Identification documents must be an original or certified copy and must be verified through the U.S. Department of Homeland Security's (DHS) Verification of Lawful Status (VLS) system, the Systematic Alien Verification for Entitlements (SAVE) system, or the U.S. Citizenship and Immigration Services (USCIS) website.

The Department of Highway Safety and Motor Vehicles (Department) Division of Motorist Services (MS), Bureau of Credentialing Services' Document Validation Unit (DVU) is responsible for managing applicant verification cases when the VLS system cannot verify the legal status at the time of the applicant's initial visit to a DL or Tax Collector's office. These verification cases are processed through the Department's Online Registration and Identity Operating Network (ORION) system's DVU work queue.

From July 1, 2021 - December 31, 2022, DVU members sent 1,055,548 cases for verification to DHS's SAVE system. DVU members worked 151,832 ineligibility cases. The total number of eligible cases that ORION automatically resolved was 903,716. As of December 2023, 2,860 cases were awaiting a response from the SAVE system.

The purpose of this audit was to evaluate the efficiency and effectiveness of the DVU, and compliance with applicable laws, Department policy and procedures. We reviewed how the DVU receives and processes applicant's ineligibility cases; how cases are assigned for work, accounted for, and tracked; how DVU maintains compliance with the Memorandum of Agreement (MOA) with DHS (which governs the verification, safeguarding, using, maintaining, and disclosing certain citizenship and immigration status information) and the REAL ID Act; reviewed training requirements and communications standards within the section; and examined the DVU's supervisory review process.

Our review determined programming efficiencies could be realized by improving the DVU case management system. DVU members cannot effectively and efficiently work on cases without having to do workarounds to maintain progress with processing the volume of cases submitted to the Department. This affects a member's productivity and can cause untimely case processing. Further, the inability to produce reports causes additional work to maintain data in separate systems to allow for reporting. We



recommend MS and Information Security Administration (ISA) management prioritize immediate needs or enhancements in ORION and seek to execute such enhancements to allow the DVU to review the verification of lawful status cases more effectively and efficiently. We also recommend MS management ensure adequate staffing resources are available and appropriately allocated to process verification of lawful status cases efficiently and timely.

Our review also determined that implementing formal documented procedures would provide controls and establish clear responsibilities and accountability for DVU operations. There is no formal documented policy or procedure regarding how cases are assigned, evaluated, accounted for, and tracked. Formal written policies and procedures would help promote the quality and consistency of operations and ensure DVU members understand and meet their responsibilities. We recommend that DVU management formalize and implement policies and procedures to establish clear responsibilities and accountability for DVU operations.

Additionally, our review determined developing written procedures would guide how and when to conduct, evaluate, document, and retain evidence of supervisory reviews. The review and approval of DVU members' casework are controls that help management gauge whether operational and personnel goals are being met. We recommend that DVU management develop written guidance on how and when to conduct, evaluate, document, and complete supervisory reviews. We also recommend that DVU management retain evidence that reviews are being conducted.

DVU management concurred with the findings and recommendations and has begun implementing corrective actions.

Background and Introduction

The Department is the issuing authority for a Florida credential and must ensure that it collects, retains, and verifies all required information to prevent the issuance of credentials to ineligible applicants.

Section 322.08 F.S., *Applicants for License; requirements for license and identification card forms*, requires the applicant's full name, date of birth, gender, proof of social security number, and citizenship or legal presence when issuing a DL for the period not to exceed the expiration date of the document presented or one year.

Title 6 CFR Part § 37.11, *Application and documents the applicant must provide*, explains the requirements for applying for a Florida credential. It also defines the explicit source documents that must be presented to be eligible for a credential.



Title 6 CFR Part § 37.13, *Document verification requirements*, provides that states must verify the documents and information required under § 37.11 with the issuer of the document. States shall use systems for the validation of documents and identifying data as they become available or use alternative methods approved by the U.S. DHS. The Department has entered into a MOA with DHS to routinely utilize the automated system known as SAVE to verify the legal presence status of a person, other than a U.S. citizen, applying for a credential.

Applicants establish proof of identity by providing documents with their legal name, date of birth, and gender. Applicants establish their proof of identity through the Social Security Administration or the Divisions of DHS.

According to DL Operations Manual IR09, *Identity and Legal Presence*, the proof of legal presence is established by providing acceptable documentation verifying status in one of the following categories:

- **U.S. Citizenship** – A U.S. citizen who is born in the U.S. presents an original or certified birth certificate/ birth registration or valid U.S. passport to establish U.S. citizenship. Applicants must also show proof of a social security card.
- **Permanent Resident status** – An immigrant is a person who has declared their intention to stay in the U.S. permanently and has been granted permission. All immigrants must show proof of a social security card.
- **Non-immigrant status** – A non-immigrant is a person in the U.S. temporarily. This can extend from days to years depending on the type of visa they are given. They can be deported at any time by the U.S. government. Non-immigrants are also required to provide a secondary identification document.

Verification Systems

The DVU's Operations Manager arranges for DVU members to gain system access through DHS's SAVE system liaison by granting the ability to view, submit questions, and upload documents when working on cases. ORION is the online registration and identity operation network system that the Department uses to view and update customer data. ORION is integrated with the VLS and the SAVE systems, which is a service of DHS's USCIS verification software. This service is a website that is used to view the status of legal presence cases. Only DVU members are permitted to have access to the SAVE system, but the USCIS website's information can be utilized by applicants, DL offices, or DVU members by the verification number (case number).

Applying for a Florida Credential

Applicants seeking a Florida credential are required to present documentation to prove their identity and legal status to a DL or Tax Collector's office. The DL examiner scans and submits the provided documents through ORION, which systematically validates



the VLS credentials and identification documents during the transaction. This is a web service inquiry that provides a fast, secure, and efficient method for the Department to verify applicants' immigration, naturalized, and/or derived citizenship status through the U.S. DHS. This is considered the first verification requirement.

If the lawful status of the applicant is not verified through the VLS system, ORION will flag the applicant's record automatically through the Department's Central Issuance Processing System (CIPS). Then, the record is placed in a queue to be worked by a DVU member for secondary verification. The applicant may receive a 60-day temporary permit (if applicable), but verification is required through the DHS's SAVE or USCIS systems to receive a Florida credential.

DVU's Secondary Verification Process

The DVU's Operations Manager assigns members new cases daily from ORION's DVU work queue before DL or Tax Collector offices are open for business state-wide. The work queue is live, so additional cases that are processed can alter the number in the queue. The Operations Manager divides and assigns cases evenly among all DVU members per day.

When a DVU member sends a request via email for the identity or legal presence of an applicant, the SAVE system sends a response directly to the appropriate DVU member after its review. The DVU member evaluates the response and implements the action, such as submitting a response to CIPS for a Florida credential, resubmitting a document, or canceling the temporary permit.

Cancellation letters may be sent to applicants to inform them that their temporary permit is being canceled and they must provide unexpired identity documents to the Department for compliance before the effective date is reached. The temporary permit can also be canceled due to document(s) that were not scanned appropriately by the DL examiner. It also informs the applicant they can request a hearing by an officer by submitting evidence that their temporary permit should not be canceled. They can go through a circuit court review as referenced in Section 322.31, F.S.¹ The case can then be closed within the SAVE system. The case is considered closed in the DVU's work queue, but ORION does not allow the case to be removed from the work queue.

If the SAVE system returns a response to the DVU member stating the applicant is eligible, the member can issue a Florida credential and then proceed to close the case.

¹ Section 322.31, F.S. – *Right of review* - The final orders and rulings of the Department wherein any person denied a license, or where such license has been canceled, suspended, or revoked, shall be reviewable in the manner and within the time provided by the Florida Rules of Appellate Procedure only by a writ of certiorari issued by the circuit court in the country wherein such person shall reside, in the manner prescribed by the Florida Rules of Appellate Procedure.



The case is released to CIPS to print the credential when the applicant has satisfied all requirements. The credential is then mailed to the applicant and the case is considered closed.

DVU Operations

Members are responsible for answering calls and emails daily from a centralized email and phone number that is provided to legal entities and DL or Tax Collector offices for ineligible case requests and inquiries. These inquiries can range from getting an update on a case or requesting another temporary permit for an applicant, to legal inquiries.

DVU members are accountable for keeping a log of the cases they work on daily. This information is tracked in a spreadsheet under the member's name. The numbers that are entered by each member are automatically captured in one spreadsheet for the daily/monthly totals of all DVU members. At the end of each month, this spreadsheet is shared with management. Members are also required to submit a daily record of each case the member worked on during the month and the status of the case.

DVU Case Management and Oversight

Weekly, DVU management reviews the status of cases with each member. They discuss the number of backlog cases from the U.S. DHS to determine if members can address any specific cases. They also look for trends when DVU members find issues that may affect other members, such as fraudulent documents, ineligible applicants, or cases that have gone to court. The Operations Manager developed a spreadsheet to show a synopsis of completed cases. This information is shared with management monthly. In addition, weekly meetings assist DVU with responding to questions that affect policy changes statewide, clarification of an existing policy, or providing responses that are posted on a bulletin board where questions and answers can be placed relating to issuing a Florida credential.

Weekly, the Operations Manager conducts supervisory reviews on selected members' cases to ensure DVU members are processing cases timely and implementing appropriate action on responses returned from SAVE or USCIS systems. More frequent reviews may be done if there is a noticeable pattern of issues requiring attention. The Operations Manager reviews approximately twenty cases per member. A file is maintained on each DVU member. The only time documentation is added to the member's file is when there are errors when canceling, issuing, or substantiating cases within these systems.

Training

When DVU members are hired and given access to the SAVE system and ORION, a series of training is required. These courses relate to the different immigration and

travel documents in circulation by the DHS's USCIS website and the awareness of fraudulent documents.

The SAVE Program Guide requires that all users take a tutorial training course and understand the verification processes within the guide. When the DVU member acquires user access, a training course is required to be completed within a week and the member must participate in any updated online training offered by the USCIS system for the duration of employment.

Archiving Cases

In December 2020, the Department transitioned to ORION for the processing and issuing of a Florida credential. Before the transition, the Department tested the "search and filter" function in the DVU work queue, which included the ability to filter cases that were 365 days or older and capable of being deleted. At the time of testing, the function worked properly. After transitioning to ORION, the "search and filter" function did not work as intended.

DVU management submitted a Work Request and Prioritization (WRAP) in January 2023 to address the "search and filter" function, so the DVU members can delete completed and duplicate cases from the work queue. Currently, the WRAP request has not been implemented.

Findings and Recommendations

Orion's Work Queue Functionality

Finding No. 1: By improving the DVU case management system, programming efficiencies could be realized.

Section 322.08 F.S., specifies that each applicant shall include proof of identity which must include one of the following documents:

- A valid, unexpired U.S. passport;
- A naturalization certificate issued by the U.S. DHS;
- A valid, unexpired alien registration receipt card (green card);
- A Consular Report of Birth Abroad provided by the U.S. Department of State; and An unexpired employment authorization card issued by the U.S. DHS; or Proof of nonimmigrant classification provided by the U.S. DHS, for an original DL.



The Department's Office of Motorist Modernization is enhancing the driver's license and motor vehicle system, ORION, which is used to view and update customer data. Enhancements are intended to create more effective and efficient work processes and to provide tools to strengthen the focus on customers and outcomes.

During interviews and observations with DVU management, we noted the processing of applicants' ineligibility cases was not efficient due to the DVU work queue not functioning as intended. When we began our review, the DVU Operations Manager would assign new non-verified cases to DVU members at the beginning of each workday. The Operations Manager would scan through the DVU work queue to locate cases that had not been assigned. During our interviews with the Operations Manager, it was stated that it took around one and a half hours to gather and assign cases due to the volume of pages within the queue that could not be deleted.

For DVU members to obtain their assigned cases from the work queue daily, they would use the "snipping" tool or the "screenshot" function to obtain their cases and save them in a Word document because the "search and filter" function could not capture cases listed past the second page in the queue. The system automatically directs the member back to the beginning of the unfiltered queue by listing all DVU member's cases.

During the audit, the Program Manager moved to a different section of the Department and the Operations Manager resigned.

Also, during the course of the audit, the DVU began using Tableau software to extract the prior day's cases from ORION's DVU work queue which is saved to a shared spreadsheet. DVU members work cases from the shared spreadsheet, update case assignments in real-time, and then transfer results to ORION. Periodically, DVU management sends a list of completed or duplicated cases to ISA to be removed from the work queue.

A WRAP was submitted in January 2023 to enhance ORION's DVU work queue. This WRAP was submitted to address the "search and filter" function, so DVU members can remove completed and duplicate cases and identify cases that are specifically assigned to current DVU members. MS management is also requesting ISA to incorporate reporting capabilities into the DVU work queue. At the time of our review, the WRAP had not been implemented.

Due to the work queue issue, DVU members cannot effectively and efficiently work on cases without having to do workarounds to keep pace with the volume of cases submitted to the Department. This is affecting members' productivity and causing untimely case processing. Also, the DVU section is understaffed, with three vacancies out of seven total positions in the unit. Staff from other sections are currently assisting with the workload.



Further, the inability to produce reports causes additional work to maintain data in separate systems to allow for reporting.

Recommendations

We recommend MS and ISA management prioritize immediate needs or enhancements in ORION and seek to execute such enhancements to allow the DVU to review the verification of lawful status cases more effectively and efficiently.

We also recommend MS management ensure adequate staffing resources are available and appropriately allocated to process verification of lawful status cases efficiently and timely.

Management Response

Since the inception of this audit, the program area has created a database of outstanding cases which allows for the cases to be tracked and assigned efficiently. This database also enables us to accurately track how many open cases exist and where in the process each case is.

In addition, we have a couple of WRAPs that have been submitted to enhance the functionality of the document validation queue in ORION; however, the creation of the database has greatly enhanced the efficiency of the DVU so these are no longer an immediate need and can be prioritized accordingly.

The program plans to fill the vacant positions once the Department's hiring hold is lifted. In the meantime, DVU staff have been working overtime and FLOW staff have been assisting whenever they are not working a FLOW detail.

Formalize Policies and Procedures

Finding No. 2: Implementing formal documented procedures would provide controls and establish clear responsibilities and accountability for DVU operations.

Department Policy 11.12, *Management Control*, specifies managers are responsible for stipulating and establishing policies, plans, operating standards, and procedures. Managers should establish practical controlling processes that require and encourage members to carry out their duties and responsibilities in a manner that fosters a favorable control environment.

During our review of the DVU process, we noted a PowerPoint presentation was created to assist DVU members in how to process eligibility cases. However, there is no formal guidance for DVU members to understand their roles and responsibilities.



The Program Manager was in the process of working with management on developing written procedures but moved to another section of the Department so formal policies were not implemented to govern the DVU operations.

There is no formal documented policy or procedure on how cases are assigned, evaluated, accounted for, and tracked.

Without comprehensive written procedures, DVU could experience:

- Processing errors due to lack of guidance;
- Inconsistent practices among the members within the unit;
- Inability to enforce employee accountability; and
- No guidance to understand roles and responsibilities.

Formal written policies and procedures would promote the quality and consistency of operations and ensure DVU members understand and meet their responsibilities.

Recommendation

We recommend that DVU management formalize and implement policies and procedures to establish clear responsibilities and accountability for DVU operations.

Management Response

The program just recently hired the DVU supervisor and appointed a Program Manager. They are in the process of developing written procedures for the unit. These will be completed on or before May 31, 2024.

Supervisory Reviews

Finding No. 3: Developing written procedures would provide guidance on how and when to conduct, evaluate, document, and retain evidence of supervisory reviews.

The *Internal Control-Integrated Framework*, published by the Committee of Sponsoring Organizations (COSO), discusses documented policies and procedures as control activities to establish clear responsibility and accountability.

In interviews with the Operations Manager, it was stated that weekly supervisory reviews are being conducted, but the reviews are not documented unless there are errors revealed in canceling, issuing, or sending cases to the USCIS website for further verification. The Operations Manager picks around 20 cases per member but does not maintain the list of reviewed cases or documentation to account for the reviews unless some errors or actions must be addressed by the member.



There is no standard procedure or guidelines on how to conduct, evaluate, and document supervisory reviews. Additionally, there is no written guidance to specify the required frequency for performing supervisory reviews.

Supervisory reviews are not being documented for verification that an assessment has been completed and to retain evidence that reviews are being conducted on DVU members.

Recommendations

We recommend that DVU management develop written guidance on how to conduct, evaluate, document, and when to complete supervisory reviews.

We also recommend that DVU management retain evidence that reviews are being conducted.

Management Response

The program just recently hired the DVU supervisor and appointed a Program Manager. They are in the process of developing a supervisory audit process/procedures. These will be completed on or before May 31, 2024.



Purpose, Scope, and Methodology

The purpose of this engagement was to evaluate the efficiency and effectiveness of DVU and compliance with applicable laws, Department policy and procedure.

The scope of this engagement covered DVU's processes from July 1, 2021 – December 31, 2022.

The methodology included:

- Reviewing applicable statutes, rules, manuals, and procedures;
- Reviewing the requirements of the MOA and the REAL ID Act;
- Interviewing appropriate Department personnel;
- Gaining an understanding of how DVU receives and processes applicant's ineligibility cases;
- Determining how DVU cases are assigned, accounted for, and tracked;
- Analyzing the number of cases in the DVU work queue;
- Reviewing training requirements and communication standards of DVU members;
- Determining supervisory reviews and if compliant with policy and procedures;
- Reviewing a sample of the supervisory reviews of cases; and
- Reviewing the process for archiving duplicate cases.

Acknowledgment

We would like to thank the members of DVU who assisted during the audit and express our appreciation for their cooperation during the course of our examination.



Distribution, Statement of Accordance, and Project Team

Distribution

Dave Kerner, Executive Director
Robert Kynoch, Deputy Executive Director
Jennifer Langston, Chief of Staff
Terry Stepp, Deputy Director of Customer Service Delivery
Sonia Colon, Chief of Credentialing Services
Terrence Samuel, Chief Information Officer

Melinda M. Miguel, Chief Inspector General
Sherrill F. Norman, Auditor General

Statement of Accordance

Section 20.055, Florida Statutes, requires the Florida Department of Highway Safety and Motor Vehicles' Inspector General to review, evaluate, and report on policies, plans, procedures, accounting, financial, and other operations of the Department and to recommend improvements. This audit engagement was conducted in accordance with applicable *International Standards for the Professional Practice of Internal Auditing* published by the Institute of Internal Auditors and *Principles and Standards for Offices of Inspector General* published by the Association of Inspectors General.

Project Team

Engagement conducted by:
Kim Butler, Auditor

Under the supervision of:
Erin Mook, Audit Director

Approved by:



Mike Stacy, Inspector General

ATTACHMENT - Management Response



Dave Kerner
Executive Director

2900 Apalachee Parkway
Tallahassee, Florida 32399-0500
www.flhsmv.gov

MEMORANDUM

DATE: January 25, 2024
TO: Erin Mook, Audit Director
FROM: Terry Stepp, Motorist Services Deputy Director
SUBJECT: Management Response to the Document Validation Unit Audit (202223-19)

The following is our response to the findings and recommendations presented in the report.

Finding 1: By improving the DVU case management system, programming efficiencies could be realized.

Recommendations

We recommend MS and ISA management prioritize immediate needs or enhancements in ORION and seek to execute such enhancements to allow the DVU to review the verification of lawful status cases more effectively and efficiently.

We also recommend MS management ensure adequate staffing resources are available and appropriately allocated to process verification of lawful status cases efficiently and timely.

Management Response

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In addition, we have a couple of WRAPs that have been submitted to enhance the functionality of the document validation queue in ORION; however, creation of the database has greatly enhanced the efficiency of the DVU so these are no longer an immediate need and can be prioritized accordingly.

The program plans to fill the vacant positions once the department's hiring hold is lifted. In the meantime, DVU staff have been working overtime and FLOW staff have been assisting whenever they are not working a FLOW detail.

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Finding 2: Implementing formal documented procedures would provide controls and establish clear responsibilities and accountability for DVU operations.

Recommendation

We recommend that DVU management formalize and implement policies and procedures to establish clear responsibilities and accountability for DVU operations.

Management Response

The program just recently hired the DVU supervisor and appointed a Program Manager. They are in the process of developing written procedures for the unit. These will be completed on or before May 31, 2024.

Finding 3: Developing written procedures would provide guidance on how and when to conduct, evaluate, document, and retain evidence of supervisory reviews.

Recommendations

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We also recommend that DVU management retain evidence that reviews are being conducted.

Management Response

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