



Charles D. Baker, Governor  
Karyn E. Polito, Lieutenant Governor  
Stephanie Pollack, Secretary & CEO  
Erin C. Deveney, Registrar



September 13, 2018

The Honorable Suzanne Bump  
State Auditor  
Massachusetts State House, Room 230  
Boston, MA 02133

Dear Auditor Bump:

I am formally requesting that your office take the appropriate steps to address publicly the inaccurate findings contained in Audit No. 2017-0511-3A, *Official Audit Report – Issued September 6, 2018 Registry of Motor Vehicles For the period July 1, 2014 through December 31, 2016*. The inaccuracies contained in this report, especially any continued assertion that the RMV issued over 1,900 driver's licenses in the name of deceased individuals, call into question the integrity of the RMV, and call into question the methodology that your office utilized in conducting this audit.

The RMV is restating its written responses provided to your office when presented with the draft final audit report in April. In providing its responses, the RMV endeavored to alert your team to errors contained in that draft.

**1. Use of death information in the disabled parking placard process.**

The first finding pertaining to the issuance of disabled parking placards alleges that the RMV does not use the Social Security Administration Death Master File to determine if a placard holder is dead. Specifically, the audit states that “[a]lthough RMV uses the Vital Statistics File that it obtains from DPH to identify deceased individuals’ placards and remove them from its database, using only this source of information may not be effective.”

During the audit, the RMV confirmed in writing to your office on October 2, 2017 that the RMV uses both the Death Master File and the DPH death records. Further, the RMV stated in writing that it “will continue to run both the SSA file and the DPH file to do a comparative analysis on the data quality.” The RMV also confirmed its use of both the Social Security Administration Death Master File and the DPH death records in the January 17, 2018 preliminary findings meeting that I participated in with your staff.

It is troubling that the final audit report that your office provided to the RMV on September 6, 2018 seemingly dismissed the information provided to your office on at least two (2) occasions in the audit process in its reply to the RMV’s response by stating that, “[r]egardless of which information RMV is currently using to update this information...” Your office’s response suggests a disregard for the RMV’s efforts to ensure that your findings included accurate information

about the RMV's processes and the files used to ascertain the death of placard holders.

**2. RMV issued 1,905 licenses after licensees' dates of death**

The RMV communicated in writing to your office on April 27, 2018 that the Registry had reviewed a subset of 105 records of the 1905 files referenced in your final draft and determined those persons were alive.

Since the public release of your audit, RMV staff has spent considerable time reviewing the licensees you assert are deceased. After reviewing nearly half of the 1,905 records, the RMV has located hundreds of file photographs of the individuals, taken both before and after the date your audit claims these individuals passed away. The RMV quickly determined that these are images of the same person. Additionally, the RMV identified a number of individuals that you reported passed away and that RMV staff know personally and that the RMV can confirm are still living. The RMV appreciates your office's careful review of these findings this week with RMV staff. RMV staff is available to review these photos with your office at greater length at your convenience.

The RMV also appreciates the courtesy that members of your team have shown this week to explain how this audit's finding was arrived at initially by your office. During the course of these conversations, your staff admitted that the conclusion that the RMV issued 1,905 licenses after the date of death was reached incorrectly, without your office using all the demographic information available to it from the Social Security Death Master File and instead relying on a single data point match.

In the February 15, 2017 letter sent by your office to Transportation Secretary Pollack, your office expressed its intention to audit to determine if the RMV was "properly administering its Automated License and Registration System (ALARS) to ensure that only valid licenses and registrations are issued in the Commonwealth of Massachusetts." This scope was very broad and in order to comply with it, the RMV provided your office with VPN access to ALARS, the registry's database, access to LOGI and provided your team data warehouse tables. The RMV records provided to your office showed all historical records for licensees because this is how information is maintained by the RMV in the normal and ordinary course of business. This access to data, and how the

information in those data sources was to be understood, was discussed between members of your office and members of the MassDOT IT staff.

In a series of email exchanges between your staff and MassDOT IT staff in October 2017, questions were raised by your staff regarding records that did not include social security numbers. In one such email exchange on October 26, 2017, MassDOT IT staff confirmed for your office that the data warehouse and information in the historical table provided to your office showed all the social security numbers assigned at some point to a person. For example, if a data entry error occurred concerning a licensee's SSN early in a person's history, the historical data reflects that a new, correct SSN was assigned to a person's record at a later date. Later in this email exchange, MassDOT informed your staff that it created a new file (persondetail\_current\_esp) that included only the last social security number value in the SSN field that could be used for running your queries.

As we have discussed with your staff this week, when your office ran licensee records against the Social Security Death Master File, it ran all social security numbers included on a person's record in ALARS against that file, which included both historical and subsequently corrected social security numbers on the person's ALARS record. The finding that your office made that the RMV issued licenses to persons after their date of death was based on a match on the single point of the date of death associated with a social security number, not with the individual information (name and date birth) contained in the RMV's licensing records. This finding was made despite the fact that your office acknowledged that the Social Security Death Master File provides additional demographic information, including name and date of birth, as well as social security number. I believe that had your office took one of the license numbers it had access to and entered that license number in the License Inquiry Field (LI) in ALARS that your staff also had access to, auditors would have been able to see that the demographic information in the master death file such as the name of the deceased did not match the name associated with the license number contained in the RMV license record. Alternatively, if your office used the information contained in the table provided to your office which contained only the most updated social security number (persondetail\_current\_esp) entered, auditors would not have incorrectly identified current licensees as being deceased based on another person's date of death.

Your finding that the RMV issued over 1,900 driver's licenses to individuals after their dates of death is inaccurate and I am requesting you address this immediately. Your



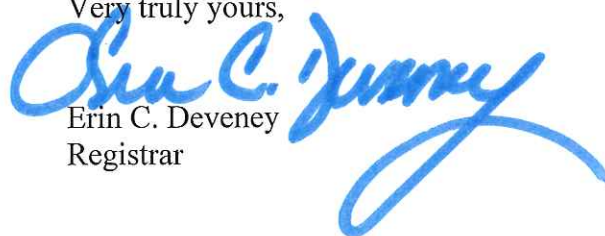
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website still incorrectly carries a headline that the RMV was issuing licenses after persons died. The RMV has provided your office with sufficient information in support of its April 27, 2018 response - that the RMV had not issued licenses to deceased individuals, to prove that the audit's finding is incorrect. I am asking that you immediately have this reference removed.

Since 2015, the RMV has been engaged in a series of continuous improvement efforts regarding the management and delivery of services to the customers that we serve. The inaccuracies in the final report released by your audit undermine these efforts and mislead the customers the RMV serves. The RMV staff who provide those services and members of the public deserve to have these inaccuracies addressed formally.

I appreciate the time that you and your staff have given to the RMV to address this matter and look forward to working with you to reach a proper resolution of these concerns.

Very truly yours,



Erin C. Deveney  
Registrar