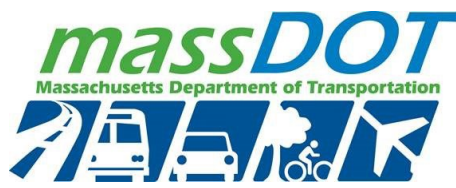


RMV Title Division Unit

## MassDOT Audit Operations Report

July 09, 2025



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To: Directors Richard Dimino, Chair, Tim King, and Eric Batista

From: James Logan, Director of Audit Operations

Date: July 09, 2025

**RE: Internal Audit of the RMV Title Division Unit**

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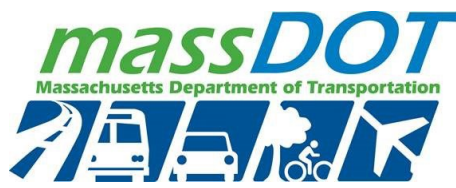
### **Executive Summary**

Audit Operations has completed a performance audit of the RMV Title Division for fiscal years 2019, 2020, and 2021. The audit was conducted in accordance with Generally Accepted Government Auditing Standards (GAGAS). The audit focused on evaluating and improving internal controls, standards and operating procedures covering the RMV Title Division.

The audit included interviews with RMV Title Division personnel and a review of internal controls, policies, and procedures surrounding the completion of the RMV payment and title process.

The primary objectives of this audit were to review and evaluate the management and operation of the RMV Title Division to determine whether it is meeting its objectives and complying with Commonwealth law, including Mass General Law, Chapter 90D, Section 4, "Application for certificate of title required", and procedures including the following:

- Policies and procedures for the RMV Title Division are documented and adhered to by employees.
- Training is required for Title Division employees on the ATLAS system including Title processing and fee payment functions.
- The Electronic Lien & Title (ELT) Program accurately stores lienholders' electronic records, including lienholders' codes, to ensure that titles are sent to the correct party.



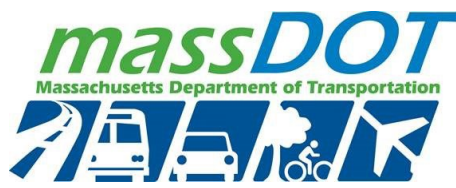
- Effective controls are in place and functioning to ensure completion of title transactions for Massachusetts licensed drivers, including processing all fees through ATLAS.
- Mail received from customers is organized so that all title payments are processed daily and deposited to Bank of America.
- All methods of payment are available to customers including online processing.

The purpose of this internal audit report was to assist management in identifying control weaknesses, strengthen internal controls, and mitigate risks to improve the overall administration of the RMV Title Division. Several opportunities to improve the administration of the process were noted. Audit identified seven (7) issues, two (2) were rated as high risk and listed below:

1. After requesting written Standard Operating Procedures (SOPs) at the beginning of our audit, we were informed that the Units in the Title Division do not have documented SOPs. Late in the audit, during October 2021, Title Division management provided us with some procedures form ATLAS.

2a. Audit Operations observed storage boxes and file folders containing personal Information of RMV customers (title document information) and specialty license plates being left unsecured in the Document Control Room during the day.

- The front door of the room is not locked during business hours, which allows access for viewing customers personal information.
- Improperly safeguarding the Document Control Room could lead to loss of confidential customer information and financial assets such as money orders and checks.



2b. The ATLAS system allows RMV employees to scan Title documents containing customers personal information into the system. Once the documents are scanned into the system they should be organized and sent to a secure location.

- Audit Operations observed Title documents containing customers personal information being left unsecured at employees' workspaces in storage boxes.
- Allowing unrestricted access to personal information can potentially lead to unauthorized access / loss of confidential customer information.

Audit findings have been discussed with management and corrective action plans have been identified.

Audit Operations would like to thank the representatives of the RMV Title Division for their support and cooperation throughout our audit.

Please contact me if you have any questions or concerns at (857)-368-9777 or via email at [James.Logan@dot.state.ma.us](mailto:James.Logan@dot.state.ma.us).

CC: Monica Tibbits-Nutt, MassDOT Secretary and CEO

Ryan FitzGerald, MassDOT Chief of Staff

Hayes Morrison, MassDOT Undersecretary

Carrie Wicker, MassDOT Chief General Counsel

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Colleen Ogilvie, RMV Registrar

Nancy Cox, RMV Chief of Staff

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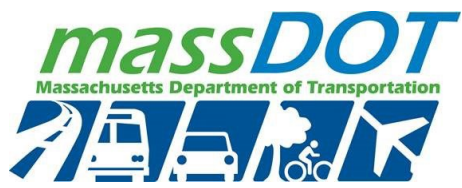
Felicia Okonkwo, Assistant Registrar of Vehicle Services

Allen Chiu, RMV Chief Compliance Officer

Amrit Singh, RMV Manager of Vehicle Service Operations

Jodie Belcher, RMV Manager of Vehicle Services Programs

Antonio DeSisto, RMV Title Review Officer



Rita Dinunzio, RMV Program Manager IV

Emily Pedersen, IGO Deputy Director of Internal Special Audit

## I. Introduction

Audit Operations audited the Registry of Motor Vehicles (RMV) Title Division for the period July 1, 2019, through June 30, 2021, in accordance with Generally Accepted Government Auditing Standards (GAGAS). The audit focused on evaluating internal controls, standards, and operating procedures. This audit was selected because the Title Division ranked as a high-risk area in the Audit Operations annual risk assessment, given the volume and sensitive nature of the transactions and data processed.

## II. Background

During Fiscal Year 2019, total title revenue was \$98,616,026. In Fiscal Year 2020, total title fee revenue was \$88,038,030. The drop in revenue coincided with the Covid-19 pandemic.

Code of Massachusetts Regulations (CMR) 540, Section 2.05, " requires a Certificate of Title for a motor vehicle. A Title is defined as a legal document issued by a state to certify the vehicle's ownership and to indicate the lienholder that financed the purchase of the vehicle (if applicable)." Massachusetts Title Law went into effect on September 1, 1972, requiring all motor vehicles and trailers to be titled within ten (10) days of purchase. Passenger vehicles with a model year of 1980 and older, and purchased before November 26, 1990, are exempt from titling. Trailers weighing 3,000 pounds or less are also exempt.

## **Titles**

To apply for a Massachusetts certificate of title the vehicle owner must provide the following:

- Completed applications including Registration and Title Applications for the motor vehicle, signed by appropriate parties.
- Proof of ownership.
- Proof of insurance.
- Payment of \$75 (plus applicable sales tax).

## **Request a Replacement Title**

To request a replacement or duplicate Massachusetts certificate of title, the vehicle owner will need:

- Vehicle Identification Number (VIN), or
- Certificate of title number, found on registration.

The vehicle owner will also need:

- A Massachusetts driver's license number (for individuals), or
- Federal Identification (FID) number, (for businesses).

The Code of Massachusetts Regulations (CMR) 540, section 2.05, requires that all vehicles must have a certificate of title issued by the RMV and must be properly endorsed at the time of sale. Each buyer of a vehicle is required by law to properly fill out the vehicle's title. Leaving the title open is illegal and is known as title jumping or skipping. Title jumping is the act of buying a vehicle and selling it without registering the vehicle in your name to avoid paying sales tax, registration and title fees.

## **RMV Title Division**

During the audit, the RMV Title Division consisted of two (2) supervisors and fifteen (15) staff personnel. The Title Division has five (5) business units, Correspondence, Add Lien, Salvage Title, Duplicate Title, and Auto Theft.

## **ATLAS System and Electronic Lien and Title Program (ELT)**

- The Electronic Lien and Title Program (ELT) started in 1995 with two pilot states, Virginia, and Massachusetts. The ELT program is a paperless method through which the Registry of Motor Vehicles (RMV) and a lienholder (lending institution) can exchange vehicle and title information through any of five service providers approved by the RMV.
- Rather than printing a paper title and mailing it to the lienholder, the RMV transmits the title record electronically. The lienholder subsequently stores the electronic record. Once the lien has been satisfied, the lienholder sends the RMV



an electronic message to release the title. The RMV then prints and mails the title to the vehicle owner, or a third party if one has been designated by the lienholder. The lienholder may request a paper title listing themselves as lienholder at any time.

- The ELT Program Manager publishes a current listing of lienholder codes. Individuals filling out a Registration and Title Application (RTA) for a vehicle that has a lienholder must enter the correct lienholder code and address on the RTA. This will ensure the title and/or electronic records are sent to the correct party once the transaction is processed. The ELT code list is available online and on TRANSNET. Companies must sign a contract agreement to gain access to the ELT system.

### **III. Scope and Objectives**

The audit focused on evaluating and improving internal controls, standards and operating procedures covering the RMV Title Division. The primary objectives of this audit were to review and evaluate the management and operations of the RMV Title Division to determine whether it is meeting its objectives and complying with Commonwealth law, including Mass General Law, Chapter 90D, Section 4, "Application for certificate of title required", and procedures included:

- Policies and procedures for the RMV Title Division are documented and adhered to by employees.

- Training is required for Title Division employees on the ATLAS system including Title processing and fee payment functions.
- The Electronic Lien & Title (ELT) Program accurately stores lienholders' electronic records, including lienholders' codes, to ensure that titles are sent to the correct party.
- Effective controls are in place and functioning to ensure completion of title transactions for Massachusetts licensed drivers, including processing all fees through ATLAS.
- Mail received from customers is organized so that all title payments are processed daily and deposited to the Bank of America.
- All methods of payment are available to customers including online processing.

#### **IV. Audit Findings**

Audit Operations identified 7 issues. There were two high level issues concerning the updating of standard operating policies and procedures, safeguarding customer personal information and RMV assets, system scanning and securing documentation. All other audit issues were identified as medium and low. RMV management responded to all audit findings. Audit Operations identified no findings concerning the processing and completion of the title transactions through ATLAS.

These audit findings are defined on the pages that follow.

### Risk Rating Scale

Risk Rating	Action to be Taken	Issues
H (High)	Close supervisory attention is required.	2
M (Medium)	The audited area requires increased attention.	4
L (Low)	Issues can be corrected within the normal course of business.	1

## Issue Summary

### High Risk Issues

Issue	Risk	Objective
Standard Operating Procedures (SOPs)	High	Standard Operating Procedures (SOPs)
Safeguarding Personal Information and Assets	High	Safeguarding Personal Information and RMV Assets

### Medium Risk Issues

Issue	Risk	Objective
Improving Employees Performance Management Process	Medium	Employee Performance Management
Updating Training Skills	Medium	Staff Training
Goals To Measure Customer Service Performance	Medium	Customer Service Performance Measures
Customers' Check Payments Completed by Employees	Medium	Safeguarding Assets / Policies and Procedures

## Low Risk Issues

Issue	Risk	Objective
Processing and Correcting Transactions in ATLAS	Low	Processing and Correcting Transactions

## Other Issues

Issue	Risk
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## No Issues

## Standard Operating Procedures (SOPs)

### Objective

Standard Operating Procedures (SOPs)

### Risk

**High**

### Implementation Date

March 2025

### Issue

IA requested Standard Operating Procedures (SOPs), for review as part of this audit, RMV management informed IA that the Divisions of the RMV do not maintain documented SOPs.

Governance documents such as policy and procedural documents should be formalized and documented, as a better practice to ensure program continuity efficacy despite unforeseen organizational changes. Lack of formalized governance may and impact the Title Divisions ability to execute its objectives, provide sufficient value to customers, and maintain compliance with laws, regulations, and internal requirements.

Note, for transparency that Title Division management provided IA with some procedures from ATLAS, late in the audit, during October 2021, but these were not formal SOPs.

### Recommendation

Improve and formalize written Standard Operating Procedures (SOPs) to strengthen internal controls and the effectiveness and efficiency of the Title Division departmental operations.

**Responsible Parties**

Amrit Singh and Antonio DeSisto

**Management Response**

The RMV recognizes the importance of Standard Operating Procedures (SOP). Since the audit was performed, a comprehensive Title SOP has been documented, published in March 2025, and communicated RMV wide. Published SOPs are also posted on the RMV TransNet site where it is easily accessible for all staff.

Safeguarding Personal Information and RMV Assets		
Objective	Risk	Implementation Date
Safeguarding Personal Information and RMV Assets	High	July 2023
Issue		
<p>A. As best practice, confidential data and assets must be properly protected and handled. MassDOT RMV should have appropriate administrative, technical, and physical safeguards to protect confidential and sensitive information from unauthorized access, disclosure, alteration, or destruction. This is supported by best practices outlined in the COSO Internal Control Framework, and applicable data protection regulations such as Driver Data Privacy Protection Act (DDPA) and applicable data. Controls should include physical access and secured storage.</p> <p>Audit Operations observed storage boxes and file folders containing personal Information of RMV customers (title document information) and specialty license plates being left unsecured in the Document Control Room during the day. The front door of the room is not locked during business hours, which allows access for viewing customers personal information. Improperly safeguarding the Document Control Room could lead to loss of confidential customer information and financial assets such as money orders and checks. Note: There are ID scans at all entrance locations to the Document Control Room.</p> <p>RMV customers mail approximately 150 to 200 checks, money orders, and title applications daily. In</p>		



discussions with Title Division officials, many envelopes do not indicate any reference to the Title Division. There are eleven additional units in the Quincy location. This has led to a lag time for processing Title applications.

In addition, Audit Operations observed mailroom employees opening envelopes to determine what unit in the Quincy location the mail should be delivered to. Mailroom employees should not be opening mail containing checks, money orders or sensitive documents.

The risk is confidential data and MassDOT assets are not safeguarded and handled appropriately, which could result in misuse of confidential data and theft.

B. The ATLAS system allows RMV employees to scan Title documents containing customers personal information into the system. After scanning, the RMV should securely store physical documents containing sensitive or confidential information after they have been digitized, in accordance with records management best practices Physical records should be stored in locked, access-controlled environments, retained only as long as legally or operationally required and disposed of securely (e.g., shredding) when no longer needed.

Audit Operations observed Title documents containing customers personal information being left unsecured at employees' workspaces in storage boxes. Allowing unrestricted access to personal information can potentially lead to unauthorized access / loss of confidential customer information.

## **Recommendation**

- A. Ensure that the main entrance to the Document Control Room is locked, including during working hours which will limit access to customer information and to effectively safeguard assets.

RMV management should evaluate and document the costs and benefits of using a bar code scanning system for recording the receipt and delivery of tracked mail. Ensure mail room employees are trained at the risk of loss of confidential information and the proper handling and disposition of checks and money orders. All sensitive and confidential information should be handled in compliance with policies, procedures and internal controls to ensure protection.

- B. Ensure that all customers' confidential information is protected and stored in a secure location, and not at employees' workspaces, or in any open physical location.

### Responsible Parties

Amrit Singh and Antonio DeSisto

### Management Response

- A. Proper procedures in the Title department to safeguard customer information and documentation have been reviewed and enforced. The file room where physical title documents and specialty license plates are stored is secured and only open and available to designated staff with card key access. The Document Control Department opens all mail addressed to the Title Department and all incoming mail is tracked in a filing system.
- B. Title documents are scanned into ATLAS for each transaction and original documents are stored in

a secure file room and sent to be archived based on the RMV's record retention policies. Access to the file room is limited to designated staff. Work is taken out during the day and locked in the secure room end of the day. In addition, at Quincy Headquarters customers are no longer allowed to enter employee workspace areas.

## Improving Employee Performance Management Process

### Objective

Employee Performance Management

### Risk

**Medium**

### Implementation Date

September 2023

### Issue

Effective employee management should be supported by timely, accurate, and relevant data to inform decisions related to performance, development, retention, and workforce planning. Management should leverage available system data to monitor employee performance and engagement, identify training and development needs, support succession planning and workforce optimization, and ensure compliance with labor laws and internal policies.

According to Title Division officials, there is reporting capability to allow managers to review employees' job performance levels. Currently, reports have not been produced. Late in the audit, during November 2021, Title Division management provided us with a report, created using a Microsoft program, (Microsoft Power BI), which documented employees' performance levels utilizing information from ATLAS.

RMV Title Division was not using a performance management system that would improve both employee performance and customer service experience.

**Note:** During the COVID-19 pandemic, other issues, including monitoring individuals working remotely, had priority.

### Recommendation

Ensure that all managers are using the Microsoft report to monitor employees' job performance levels. In addition, management should meet with staff regularly to go over the results. Based on the results, Management can determine:

- If retraining is necessary.
- If progressive discipline is needed.
- Input for employees' performance evaluations for yearly EPRS reviews

### Responsible Parties

Amrit Singh and Antonio DeSisto

### Management Response

The RMV has a 10-business day Service Level Agreement (SLA). Power BI is now used by management to track and maintain the SLA. Using Power BI, management can track number of transactions started, completed, or discarded by each employee. In addition, staff email a summary of their daily work to management which is then transferred to an excel spreadsheet for performance level tracking purposes.

## Updating Training Skills

### Objective

### Risk

### Implementation Date

Staff Training

**Medium**

September 2023

### Issue

RMV Title Division did not have structured and documented training programs to ensure employees have the necessary knowledge and skills to perform their roles effectively. RMV Title Division staff were still getting familiar with the ATLAS system and training. At this point, their training was not adequate to provide consistency and accuracy for learning the ATLAS system. There is an overreliance on experienced employees to train/advise new staff. Each of the experienced employees has their own unique way of training making it difficult to provide consistent training across the Title Division.

Training should be formalized and consistently delivered, aligned with job roles and responsibilities, documented and tracked for compliance and effectiveness and designed to reduce reliance on informal knowledge transfer.

### Recommendation

Work with the RMV Training Department to enhance employees' understanding of RMV policies and procedures by sending all employees on a yearly refresher course. Upon completion of the refresher

course the employees should take a self-assessment examination on the material covered.

The RMV should:

- Establish procedures for implementing cross training.
- Ensure training records are accurate and validated.
- Develop a documented procedure.
- Ensure training is consistent among all employees.

### **Responsible Parties**

Amrit Singh and Antonio DeSisto

### **Management Response**

All employees have been retrained and cross-trained by RMV Training Dept. and or 1-1 with Management. Employees are monitored to assess if retraining is needed in any areas. Training updates are also regularly created and sent RMV wide.

## Goals to Measure Customer Service Performance

### Objective

Customer Service Performance Measures

### Risk

**Medium**

### Implementation Date

September 2023

### Issue

Effective performance management requires the establishment of clear, measurable performance indicators aligned with team objectives, goals and activities. Customer service teams should define and track key performance indicators (KPIs) for service quality, regularly evaluate employee performance against these metrics, and use data to drive continuous improvement.

The RMV Title Division does not have specific goals to measure its customer service performance. Goals should be well developed, for example, meeting an established customer service delivery goal of title issuance within 7-10 days of receipt, or completing a certain number of customer inquiries within a time frame (performance period).

Without measuring performance against well-defined goals, the RMV cannot ensure it is maximizing the efficiency of its operations to best serve its customers.

### Recommendation

The RMV Title Division should develop, benchmark, and report goals and performance measures for



customer service. Goals, performance measures, and benchmarks should consider past results.

Ensure that policies and procedures are followed and that each Title Division unit meets customer expectations.

These steps will help improve customer service.

### **Responsible Parties**

Amrit Singh and Antonio DeSisto

### **Management Response**

The RMV has a 10-business day Service Level Agreement (SLA). Power BI is now used by management to track and maintain the SLA. Through Power BI, management can track number of transactions started, completed, or discarded by each employee. In addition, staff email a summary of their daily work to management which is then transferred to an excel spreadsheet for performance level tracking purposes.

## Customers' Check Payments Completed by Employees

### Objective

Safeguarding Assets / Policies and Procedures

### Risk

**Medium**

### Implementation Date

September 2023

### Issue

The RMV must have documented procedures for handling financial instruments such as checks to ensure accuracy, integrity, and fraud prevention. Staff currently handle checks received with missing or incorrect information (e.g., blank amounts, incorrect figures) on a case-by-case basis. In some instances, staff manually fill in or correct cheque amounts without formal guidance, documentation, or supervisory review. Currently, RMV Title employees can fill out a customer's check for them for the \$75 Title fee plus the sales tax fee of 6.25%. This type of action could be considered fraudulent.

Any manual intervention in financial documents must be governed by clear policies, segregation of duties, and audit trails to mitigate fraud and error risks. There is no formal policy or standard operating procedure (SOP) in place for managing incomplete or incorrect checks. Staff rely on informal practices and personal judgment.

### Recommendation

Prohibit the current process of completing check payments for customers. Filling out blank customer checks or altering checks is not appropriate or legal.

### Responsible Parties

Amrit Singh and Antonio DeSisto

### Management Response

RMV staff follows the cash manual that has been provided by the revenue operations unit and is aware that checks and money orders should not be completed by staff. Incomplete checks are rejected, and a rejection letter is sent to the customer.

## Processing and Correcting Transactions in ATLAS

### Objective

Processing and Correcting Transactions

### Risk

**Low**

### Implementation Date

March 2020

### Issue

The RMV should establish a formal, documented training and onboarding program to ensure employees are equipped with the necessary knowledge, skills, and understanding of ATLAS. Structured training will promote consistency, improve efficiency and reduce / correct errors.

The ATLAS system is more complex and requires more time than the old ALARS system to complete a transaction or correct a mistake. At the time of the audit, the ATLAS system was still new to the RMV staff and system training was ongoing. The Title Division needs information quickly to process payments, research items, and answer any questions related to title processing.

Training improvements for staff to navigate through ATLAS are necessary for processing and researching information.

### Recommendation

Conduct meetings with ATLAS personnel to determine any improvements/enhancements necessary to the programming system to provide the daily services customers require.

Prioritize ATLAS training for staff, including providing necessary retraining for current staff and creating an ATLAS training program for new hires.

### Responsible Parties

Amrit Singh and Antonio DeSisto

### Management Response

This audit was conducted when the RMV was transitioning systems from ALARS to ATLAS. With the new system, there was a learning curve for all staff. Over time, the system has become more developed and ATLAS trainings have also been created to train staff and ensure consistency in processing transactions.