



State of Oregon

Oregon Motor Voter Program Audit

July 1, 2025



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July 1, 2025

The Honorable Tina Kotek
Governor of Oregon
Office of the Governor
900 Court Street NE, Suite 254
Salem, OR 97301

Delivered electronically

Dear Governor Kotek,

At your request, and in coordination with the Secretary of State, the Oregon Department of Administrative Services (DAS) has engaged Baker Tilly Advisory Group to conduct an independent, external audit of the Oregon Motor Voter Program (OMV Program). This action follows the identification of issues within the program that warranted further examination to ensure the integrity and effectiveness of Oregon's voter registration processes.

The audit evaluated the effectiveness, accuracy, and security of the OMV Program, with a focus on compliance, internal controls, and data integrity. Both the Oregon Driver & Motor Vehicle Services (DMV) Division of the Oregon Department of Transportation (ODOT) and the Elections Division of the Secretary of State (SOS) participated in the audit as subject agencies.

We assessed the program's alignment with applicable state and federal requirements, including ORS 247.017 and ORS 807.465, and evaluated risks related to data entry errors, fraud, system failures, cybersecurity, and inter-agency coordination. Our findings and recommendations are intended to support the State of Oregon in strengthening the integrity, compliance, and operational efficiency of the OMV Program.

We appreciate the cooperation and transparency demonstrated by ODOT, DMV, and the SOS throughout this engagement. We look forward to supporting the State's continued efforts to enhance public trust in the voter registration process.

Sincerely,

A handwritten signature in dark ink, appearing to read "Chris Kalafatis", with a stylized flourish at the end.

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Executive Summary

Purpose of the Audit

The OMV Program was established to streamline the voter registration process by automatically registering eligible individuals after qualifying interactions with the Oregon DMV, a division of ODOT. The program is a collaborative effort between ODOT and the Oregon SOS Elections Division and is governed by state legislation including ORS 247.017 and ORS 807.465.

ODOT is an Executive Branch agency that falls under the authority of the Governor of Oregon. As such, it plays a central role in the administration of the OMV Program. Through its DMV division, ODOT is responsible for collecting and transmitting voter registration data during qualifying customer interactions, maintaining system configurations, and ensuring data integrity at the point of capture.

The Oregon SOS is the chief elections officer for the state and is responsible for overseeing the voter registration process, including the receipt and processing of data transmitted through the OMV Program. The SOS Elections Division works in partnership with ODOT to ensure that voter registration data is complete, accurate, timely, and compliant with state and federal election laws.

In late 2024, the Governor of Oregon and SOS requested an audit of the OMV Program following the identification of significant errors in voter registration data. This request was prompted by an inquiry from an external entity, which led DMV to conduct an internal examination of approximately 1.4 million customer records transmitted to the SOS Elections Division. The assessment uncovered clerical, technical, and policy-related errors that resulted in more than 1,500 records sent in error. These findings raised concerns about the program's data integrity, internal controls, and compliance with legal requirements. Since late 2024, internal controls over the OMV Program have been strengthened prior to and during this audit.

Conclusions

This audit of the OMV program concluded that processes and internal controls have been established around areas of previously identified errors and are generally effective, although some control gaps and exceptions were noted. Controls are in place to ensure the accuracy of voter registration data; however, one unsupported issuance transaction was identified during audit testing. There is a reliance on legacy citizenship records, resulting in potentially inaccurate or unsupported citizenship designations made prior to the strengthened control environment to persist, potentially leading to inaccurate data being transmitted by the OMV program. We did find that the systems and technologies supporting the program are appropriately configured, leverage automation effectively, and are adequately secured to protect voter registration data, with opportunities to improve user access management and oversight.

During the audit, key strengths were noted that reflect a commitment to improvement and a proactive approach to program oversight. Program staff consistently exhibit a culture of continuous improvement, often identifying and addressing potential control gaps independently and ahead of audit inquiries. Additionally, the program shows strong legislative awareness, with teams actively monitoring and preparing for changes in state legislation that could impact the OMV program. Collectively, these strengths underscore the program's commitment to accountability, transparency, and ongoing service enhancement.

Results Summary

Findings

Finding 1: Citizenship Documentation and Verification (page 8)

For one (1) of thirty-five (35) sampled transactions, records and documentation provided for the audit did not indicate proof documents had been presented by the customer to support US citizenship status.

Finding 2: Form 173DP and Oregon License Issuance and Vehicle Registration (OLIVR) Review Controls (page 9)

While Field Services Admin Manual - Report Preparation Procedures (OPS-10) outlines a control requiring the review of Form 173DP and OLIVR entries, it does not require documentation or sign-off to evidence that the review was completed. As a result, the audit team was unable to test the operating effectiveness of this control.

Finding 3: Policy Evaluation and Legislative Monitoring (page 10)

One policy was not reviewed within the expected cycle, and there is no formal documentation of the policy review cadence. Legislative updates are monitored for OMV Program impact, but there is no centralized tracking for federal legislation.

Finding 4: Training Policy and Administration (page 11)

While all sampled DMV staff completed required training on time, there is no formal written policy outlining annual training requirements. SOS does not administer OMV-specific training.

Finding 5: Issue Escalation Process (page 12)

There is no formal, centralized process for escalating significant issues or errors within the OMV program to facilitate proper communication and escalation in a timely manner.

Finding 6: Signature File Transfer Documentation (page 13)

Outbound time data for three (3) of thirty-five (35) signature files could not be verified due to unavailable system records, limiting assurance over timely processing.

Finding 7: Failure Notification Tracking (page 14)

Neither DMV nor SOS maintain formal mechanisms to track and document system-generated failure notifications. Thirteen (13) of fifteen (15) failure notifications provided by SOS were either not resolved timely or lacked sufficient documentation to confirm resolution.

Finding 8: User and Admin Access Reviews (page 1)

Formal user access reviews are not performed for the OMV system, or for administrative users for MOVEit.

Satisfactory Results

Communication, Roles and Responsibilities:

Memorandum of Understandings (MOUs) and amendments are current, complete, and aligned with legislative requirements.

OLIVR Configurations and Changes:

System configuration changes align with OMV program requirements.

Daily Control File Reconciliation:

Issuance file transfers are accurately tracked and reconciled.

SOS Program Monthly Audit:

The monthly audit process is timely, complete, and follows established procedures.

Introduction

Objectives

The audit focused on the following key objectives:

1. Document and assess the effectiveness of processes and internal controls within the OMV Program.
2. Verify the accuracy of voter registration data collected and transmitted by the OMV Program.
3. Evaluate the efficiency, effectiveness, and security of systems and technology used to manage voter registration data.

Scope

The scope of this engagement includes interviews, system walkthroughs, and analysis of documentation related to internal controls, data accuracy, and system security of the OMV Program from January 1, 2024, to May 22, 2025. This includes an evaluation of voter registration transactions, system configurations, inter-agency processes, and supporting records maintained by ODOT and SOS.

The following potential risk areas were evaluated:

1. Errors in manual data entry, leading to invalid voter registrations.
2. Agency fraud, including identity theft, counterfeit documentation, and insider threats, leading to invalid voter registrations and reputational damage.
3. Non-compliance with applicable state and federal requirements and/or internal policies leading to invalid voter registrations, reputational damage, and monetary loss and penalties.
4. Issues, interruptions or failures during the transfer process, leading to incomplete, inaccurate or missing data.
5. Cyber incidents, unauthorized access and system changes, leading to a loss of data integrity, confidentiality, and availability, causing disruption to operations, reputational damage, and/or monetary loss and penalties.
6. Unclear/misunderstood OMV program roles, responsibilities, and expectations between SOS and ODOT, leading to inefficient/ineffective program operations, non-compliance with applicable state and federal requirements, and invalid voter registrations.
7. Significant issues or errors are not properly communicated or escalated in a timely manner, leading to delays in resolution of invalid voter registrations and reputational damage.

Information systems included within the scope of this audit testing include:

Administered By	System	Relevant Function
ODOT	Oregon License Issuance and Vehicle Registration (OLIVR)	Processes data for daily DMV credential issuance transactions within field offices, with automated processes to identify eligible individuals for automatic voter registration through the OMV program.
	MOVEit	Secure managed file transfer software used to exchange DMV credential issuance and related OMV program data between DMV and SOS.
	MOVEit Transfer	A component of the MOVEit system, MOVEit Transfer includes the secured FTP site for SOS personnel to access transferred DMV credential issuance and related OMV program data from DMV.
SOS	Oregon Motor Voter System (OMV system)	SOS system with automated job processes receiving and processing DMV credential issuance and related OMV program data.

Methodology

To achieve the audit objectives, Baker Tilly performed the following procedures.

- **Document Analysis:** Policies, procedures, training records, and inter-agency agreements were examined to assess compliance, clarity, and alignment with legal and operational requirements.
- **Interviews and Inquiries:** Discussions were held with staff from the Oregon DMV, ODOT Information Services, and the SOS Elections Division to understand processes, internal controls, roles, and system functionality.
- **System Testing:** Key systems supporting the OMV Program, including OLIVR, MOVEit (including MOVEit Transfer), and the OMV system were evaluated for appropriateness of configurations, user access, and timeliness and effectiveness of data transfers and failure notification handling.
- **Sampling and Transaction Testing:** Both random and judgmental sampling methods were used to test the accuracy and completeness of voter registration transactions, training compliance, and system-generated reports.

Criteria and Requirements

This audit was conducted in accordance with the Generally Accepted Government Auditing Standards (GAGAS), commonly referred to as the Yellow Book, and the Institute of Internal Auditors' (IIA) International Standards for the Professional Practice of Internal Auditing. These standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on the audit objectives.

We also leveraged relevant control frameworks, including the COSO Internal Control Framework and the National Institute of Standards and Technology Special Publication 800-53 (NIST 800-53). These frameworks provide comprehensive guidance for evaluating internal controls, information security, and risk management practices.

The audit was further guided by applicable Oregon statutes, including:

- ORS 247 – Governing automatic voter registration procedures
- ORS 807 – Outlining DMV responsibilities related to voter registration

Additional criteria included:

- House Bill 2177 (2015) – The legislative basis for Oregon's automatic voter registration program, which mandates that DMV collect and transmit voter registration data to the SOS.
- Oregon Administrative Rule No. 165-005-0170 (OMV Manual)
- Internal policies and procedures established by ODOT and the SOS, including inter-agency agreements, system protocols, and training requirements.

Conclusions

Audit conclusions specific to each audit objective are as follows:

1. **Objective:** Document and assess the effectiveness of processes and internal controls of the OMV program.
Conclusion: Processes and internal controls are generally effective, but some control gaps and exceptions were noted, indicating opportunities for improvement.
2. **Objective:** Verify the accuracy of voter registration data collected and transmitted by the OMV program.
Conclusion: Controls are implemented to mitigate the risk of inaccurate data; however, previous errors, prior to the strengthened control environment, remain unidentified and could potentially lead to inaccurate data being transmitted by the OMV program.

3. **Objective:** Evaluate the efficiency, effectiveness, and security of systems and technology used to manage voter registration data.

Conclusion: Systems and technology supporting the OMV program appear to be appropriately configured to facilitate the process of filtering transactions that meet the criteria for Automatic Voter Registration (AVR), leveraging automation to efficiently process data, and properly secured to protect voter registration data. However, opportunities exist to enhance user access management and oversight.

Strengths

During this audit, key strengths were noted that reflect a commitment to improvement and a proactive approach to program oversight. These strengths include:

- **Strong Control Environment:** Additional internal controls have been established within the OMV program, notably around areas of previously identified errors, to support compliance and mitigate risk.
- **Continuous Monitoring and Improvement:** Program teams consistently demonstrated a culture of ongoing evaluation and enhancement. Throughout the audit, staff had already identified potential control gaps and were actively considering or implementing solutions often ahead of audit inquiries.
- **Forward-Looking Legislative Awareness:** The program has shown strong legislative awareness, with teams actively monitoring and preparing for changes in state legislation that could impact the OMV program. This includes early-stage planning for potential impacts and opportunities related to voter registration policy changes, and implementation of those changes as needed.

Collectively, these strengths underscore the program's commitment to accountability, transparency, and ongoing service enhancement.

Audit Results

We identified opportunities to improve the design and operating effectiveness of internal controls within the OMV Program. The individual findings are rated on a high, moderate, and low risk scale based on the specific criteria described below:

Risk rating	# of findings	Rating description
High risk	1	High risk indicates significant likelihood for organization operations continuity concerns, compliance concerns, reputational risk, legal action, and/or creation of a significant liability.
Moderate risk	7	Moderate risk indicates a moderate possibility of the above outcomes occurring.
Low risk	0	Low risk indicates a slight possibility of the above outcomes occurring.
Total	8	

Detailed Finding

1. Control Gap in Validating Legacy Citizenship Records

Risk: High

Criteria:

- According to the OMV Program's Field Driver License Procedure Manual (FDLPM-0101), a "C" Legal Presence (LP) indicator may only be assigned when a customer presents original or certified documentation proving U.S. citizenship (e.g., U.S. passport, birth certificate, naturalization certificate).
- The 173DP form must be completed and signed by two authorized staff members when verifying identity documents presented by a customer for citizenship designation.

Condition:

In a sample of 35 credential issuance transactions:

- All 35 had an LP indicator of "C-Citizen" in OLIVR
- 10 of 35 had complete 173DP forms with staff signatures and OLIVR customer record indicated proof documents presented met the requirements for "C-Citizen" LP indicator.
- 25 of 35 did not require 173DP forms:
 - 22 of 35 did not require 173DP forms, as citizenship had been previously established; OLIVR customer record indicated proof documents previously presented met the requirements for "C-Citizen" LP indicator.
 - 3 of 35 did not require 173DP forms, as citizenship had been previously established; however, no proof documentation was noted within the OLIVR customer record.
 - 1 of 3 did not have any prior 173 Driver Application Forms indicating proof documents provided that met the requirements for "C-Citizen" LP indicator. This C-Citizen assignment is not supported by any provided documentation or records.
 - 2 of 3 were properly supported by prior 173 Driver Application Forms indicating proof documents provided that met the requirements for "C-Citizen" LP indicator.

These 3 transactions occurred on:

- 2/27/2025 – Citizenship established in 2013 (*before enhanced controls*)
- 3/7/2025 – Citizenship established in 2018 (*before enhanced controls*)
- 3/7/2025 – Citizenship established in 2016 (*before enhanced controls*)

Cause:

- Legacy records, including notation of proof documents establishing citizenship, from before the implementation of OLIVR were not carried forward into OLIVR customer records.
- ODOT (DMV) cannot require information for re-verification of citizenship once it has been established. Oregon statute ORS 807.040 specifies the required information for issuance transactions, and would not allow for additional information beyond what is stated in the statute.

Effect:

- Reliance on legacy citizenship records introduces a risk that inaccurate or unsupported “C-Citizen” designations may persist in the system. This could result in ineligible individuals being automatically registered to vote and only discovered if/when future transactions reveal non-citizen status based on documents presented. One of thirty-five (2.8%) sampled transactions had an unsupported “C-Citizen” designation. Although the number of potentially ineligible individuals being automatically registered to vote is likely too small to affect the outcome of an election, the existence of such cases poses a moderate reputational and compliance risk. It may undermine public trust in the voter registration process and expose the agency to increased scrutiny.

Recommendations

- 1.1 Develop and implement a formal plan to address legacy data concerns for Automatic Voter Registration (AVR). This plan should incorporate best practices and insights gathered from other AVR leaders from across the country and be developed collaboratively between ODOT and SOS. The plan should assess any changes or restrictions to the types of records shared from DMV to SOS, and potential updates needed in Oregon Administrative Rules, the Oregon Motor Voter Registration Manual, the ODOT/SOS Interagency Agreement, and related technology.

Management Response

Responsible: ODOT (DMV) Program Services

Agree or Disagree: Agree

Action Plan: Using recommendations created by the National Data Best Practices Working Group, ODOT-DMV will work collaboratively with SOS to evaluate the risk of potential errors in legacy records and develop a formal plan to account for this issue. The formal plan will address any required statutory and administrative rule changes as well as updates to the ODOT/SOS IAA and related technology. The completion date reflects a date the plan will be formalized, including an implementation timeline.

Estimated Completion Date: December 2025

Detailed Finding**2. Lack of Evidence for Form 173DP and OLIVR Review Controls**

Risk: Moderate

Criteria:

- According to the Field Services Administration Manual, OPS-10 Procedure (Effective 03/19/2025) pages 13–14, the report person is required to review Form 173DP and OLIVR entries for completeness and accuracy as part of the daily report preparation process.
- Best practices in internal control design recommend that key review activities be evidenced through sign-off, timestamps, or other documentation to confirm that the control was performed.
- Controls should be clearly communicated and consistently applied across all field offices.

Condition:

- The control is not effectively designed to require evidence of performance, such as initials, checklists, or system logs. As a result, the audit team was unable to test the operating effectiveness of this control.

Cause:

- While the OPS-10 procedure outlines a control requiring the review of Form 173DP and OLIVR entries, it does not require documentation or sign-off to evidence that the review was completed.

Effect:

- Without evidence of and accountability for the performance of Form 173DP and OLIVR reviews, there is a risk that these reviews may not be consistently performed – resulting in undetected errors in credential issuance or legal presence documentation.
- Potential for inaccurate data being transmitted to the SOS for automated voter registration purposes, affecting the integrity of the OMV Program.
- The lack of documented evidence limits the ability to monitor compliance, perform audits, or take corrective action when issues arise.

Recommendations	Management Response
2.1 Update the OPS-10 procedure to require documented evidence that the Form 173DP and OLIVR reviews were completed (e.g., initials, electronic checklists, or audit logs) and communicate/train staff on this requirement.	Responsible: ODOT (DMV) Field Services Agree or Disagree: Agree Action Plan: Field Services will revise the procedure to include additional report processing requirements documenting review completion. Field Services will communicate the report processing change and train staff on the requirement. Estimated Completion Date: August 2025
2.2 Consider implementing a periodic quality assurance review to verify that these controls are being performed and documented appropriately.	Responsible: ODOT (DMV) Field Services Agree or Disagree: Agree Action Plan: Field Services Management Team will establish a periodic review process to verify the report processing requirements are being performed and documented. Field Services will document the decision in policy, communicate, and train staff accordingly. Estimated Completion Date: August 2025

Detailed Finding**3. Incomplete Policy Evaluation Cycle and Federal Legislation Tracking****Risk:** Moderate**Criteria:**

- OMV Program policies and procedures should be evaluated at least every two years to ensure completeness, accuracy and compliance with current state and federal requirements.
- Federal and state legislation impacting the OMV Program should be actively monitored using formal tracking mechanisms.
- Best practices in policy governance recommend maintaining a documented assessment schedule, change logs, and clearly defined responsibilities for updates.

Condition:

- One of 6 sampled policies (FDLPM-1816 Voter Registration) was last reviewed on September 9, 2022. Based on the program's two-year review cycle, the next review was due by September 9, 2024. At the time of audit fieldwork, the policy review was approximately eight months overdue.
- Interim updates to procedural manuals are not tracked in a centralized change log.
- There is no centralized tracker for monitoring federal legislation or executive orders that may impact the OMV Program.
- SOS does not maintain internal policies or procedures specific to OMV Program responsibilities.

Cause:

- The two-year review cycle for procedural manuals is a common practice for ODOT Field Services, but is not formally documented in policy.
- The effective date on procedures reflect when interim updates are made by ODOT, but no centralized log exists to track all changes or prioritize these updates for future comprehensive reviews.
- Federal legislation is monitored by various roles such as the Program Coordinator, Voter Registration Integrity Analyst, and the ODOT Federal Affairs Liaison. However, there is no centralized tracker or formal ownership structure for monitoring and tracking federal legislative changes that may impact the OMV Program.
- The Secretary of State's Office (SOS) refers to the public-facing Oregon Motor Voter Registration Manual as its primary reference for OMV Program responsibilities.

Effect:

- Inconsistent policy evaluation practices may lead to outdated or non-compliant procedures being used across DMV offices.
- The absence of a centralized legislative tracker increases the risk of missing critical changes in federal legislation.
- Lack of visibility into interim updates reduces accountability and may hinder the ability to respond effectively to audits or legal challenges.
- Without an internal policy or procedure intended to direct SOS responsibilities within the OMV Program, there may be an increased risk of operational inefficiencies or ineffective execution of program responsibilities.

Recommendations	Management Response
3.1 Formalize the OMV program's policy and procedure framework by establishing a documented two-year evaluation cycle, setting a standard cadence for updates, clearly defining responsible parties for policy oversight, and outlining procedures for implementing urgent revisions to ensure consistency, accountability, and timely responsiveness across all field offices.	Responsible: ODOT (DMV) Field Services Agree or Disagree: Agree Action Plan: Field Services will create a new Field policy chapter that includes the Field policy and procedure process and tracking. Estimated Completion Date: August 2025
3.2 Implement a formal interim change tracking process for ad-hoc updates made to OMV program policies and procedures between scheduled evaluations to improve transparency and reduce the risk of outdated content. This should include maintaining a change log and flagging updated chapters to ensure they are prioritized during the next full assessment cycle.	Responsible: ODOT (DMV) Field Services Agree or Disagree: Agree Action Plan: Field Services will revise the existing Field policy and procedure tracking tool to include interim chapter revisions with the current effective date of each chapter. Estimated Completion Date: August 2025
3.3 Implement a tracker to establish a centralized system for monitoring federal legislation and executive orders that may impact the OMV Program.	Responsible: ODOT (DMV) Program Services Agree or Disagree: Agree Action Plan: ODOT's Voter Registration Integrity Analyst will formally track and monitor all federal activity that could impact OMV. ODOT Government Relations will formalize the process in which they receive regular federal affairs updates (including federal legislation and EOs which may impact the OMV Program), log them, and share them with the VRIA. Federal affairs updates will be stored as well as made available in a tracking

	page in ODOT's SharePoint, which will be accessible by OMV program staff. Estimated Completion Date: November 2025
3.4 Develop SOS policies and procedures to define processes and promote consistency in execution of OMV Program responsibilities.	Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: OMV Program policies and procedures are described in the Oregon Motor Voter Manual, which is adopted by administrative rule. SOS-Elections will convene a Rules Advisory Committee to review and update the administrative rules related to the OMV program and the Oregon Motor Voter Manual to ensure processes are consistently applied and OMV program is compliant with state and federal election regulations. Estimated Completion Date: December 2025
# Detailed Finding	
4. Lack of Formalized Policy for Annual OMV Program Training Requirements	
Risk: Moderate	
Criteria: - Internal control best practices and state agency standards require that mandatory training programs be clearly defined, documented, and consistently applied. - Training policies should outline the frequency, content, completion deadlines, and roles responsible for oversight and compliance. - Formal training policies help ensure that staff are equipped with the knowledge necessary to perform their duties in accordance with program requirements and legal obligations. Condition: - While all sampled DMV staff completed the required training within the designated timeframe, there is no formal written policy that defines the annual training requirements. - The current training process is operationally implemented but lacks documentation that would institutionalize expectations and ensure consistency across the organization. - The SOS has not developed or maintained OMV-specific training materials or requirements since the program's initial implementation. Cause: - The annual training requirement was implemented operationally in October 2024 but has not yet been codified into formal policy. Effect: - Without a formalized training policy, there is increased risk of inconsistent training practices across staff and offices. - The absence of OMV-specific training from the SOS may lead to gaps in understanding of program responsibilities, reducing overall program effectiveness and increasing the potential for compliance issues in the future.	
Recommendations	Management Response
4.1 Formalize the existing annual OMV training requirements into a comprehensive written policy to establish clear expectations for annual training.	

Develop a clearly documented OMV training policy that outlines the scope, purpose, and structure of the program. This will ensure continuity, clarity, and Clearly specify OMV training frequency, deadlines, and roles and responsibilities in the updated policy.

This initiative will help institutionalize current practices and support long-term organizational learning and compliance. This will help ensure that all personnel are aware of expectations and timelines, thereby improving compliance and operational readiness, and accountability across the organization.

Align the OMV Program's training policy with state agency best practices, which include:

- Strategic alignment of training with agency goals
- Defined competencies and learning outcomes
- Assessment of training effectiveness and workforce readiness

Responsible: ODOT (DMV) Field Services

Agree or Disagree: Agree

Action Plan: Field Services will create a new Field policy that includes specific Field Services employee annual training requirements, including annual OMV training.

Estimated Completion Date: August 2025

4.2 SOS should develop and implement OMV-specific training for relevant staff to ensure consistent understanding of program responsibilities and procedures.

Responsible: SOS Elections Division

Agree or Disagree: Agree

Action Plan: SOS-Elections developed and produced the Oregon Motor Voter County Elections User Guide in January 2016 to train county users on OMV processes. Procedures for state staff processing OMV data were drafted in April 2025. SOS-Elections will review training materials on an annual basis and conduct annual training for OMV users.

Estimated Completion Date: September 2025

Detailed Finding

5. Lack of Formal Issue Escalation Process for the OMV Program

Risk: Moderate

Criteria:

- Internal control frameworks such as COSO and best practices in public sector governance recommend that agencies establish formal procedures for identifying, escalating, and resolving significant operational issues.
- Effective issue escalation processes are essential for ensuring timely communication, accountability, and resolution of errors that may impact service delivery, data integrity, or compliance.
- Oregon state agency standards emphasize the importance of timely and transparent communication between departments, particularly when managing sensitive data such as voter registration information.

Condition:

- The OMV Program does not have a formal, centralized process for escalating significant issues or errors.
- Current practices rely on informal communication and ad hoc responses, which vary by situation and personnel.

- A new control implemented near the end of audit fieldwork (May 2025) provides some monitoring and reporting of citizenship status changes but does not constitute a comprehensive escalation framework.

Cause:

- There is no established policy or standardized protocol for identifying, documenting, and escalating significant issues across and within the DMV and SOS offices.

Effect:

- Delays in resolving critical errors may result in invalid voter registrations remaining uncorrected.
- The absence of a formal escalation process increases the risk of inconsistent handling of issues, reputational damage, and non-compliance with legal and operational standards.
- The absence of a documented escalation protocol may hinder an agency's ability to respond to critical issues, increasing the risk of reputational harm and operational inefficiencies.
- Inadequate documentation limits accountability and impairs the ability to respond effectively to audits or public inquiries.

Recommendations	Management Response
5.1 Develop a formal policy/protocol for escalating significant issues or errors, including a standard process for communications, defining type of issues/errors and necessary stakeholders to be notified. Consider developing an escalation decision tree to illustrate how various issues should be handled.	Responsible: ODOT (DMV) Program Services Agree or Disagree: Agree Action Plan: ODOT Program Services will create a new formal procedure for defining, escalating and communicating significant issues and errors (not including System Failure notifications – covered in recommendation / response 7.1) to SOS Elections. The new procedure will be developed with input from SOS Elections. Estimated Completion Date: September 2025 Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: In April 2025, SOS-Elections drafted an internal policy to manage potential errors (not including system failures) by DMV in the OMV process. The policy includes a standard communication process between the two agencies including stakeholder notifications, unique transmission control IDs, required file contents, and an escalation process. SOS-Elections will coordinate with ODOT to formalize policy into the interagency agreement related to OMV. Estimated Completion Date: September 2025
5.2 Maintain a consolidated issue log for documenting and tracking issues/errors to resolution.	Responsible: ODOT (DMV) Field Services Agree or Disagree: Agree Action Plan: Field Services will add additional fields to the current Second Review of Document Entry Feedback - spreadsheet, to track communication of issues/errors to Program Services. This will include updating necessary procedures for this additional tracking. Program Services will consolidate all historic issues/errors with the OMV Error Log, using it to track all future issues/errors.

	Estimated Completion Date: August 2025 Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: SOS-Elections implemented a new control log for documenting and tracking issues or errors (not including system failures) from identification to resolution in April 2025. Estimated Completion Date: April 2025
# Detailed Finding	
6. Incomplete Documentation of Outbound Signature File Transfers	
Risk: Moderate	
Criteria: • Best practices in data transmission and auditability require that all file transfers, especially those involving sensitive voter registration data be logged, with complete metadata, including timestamps for both inbound and outbound transfers. • The OMV Program relies on accurate and timely file exchanges between DMV and SOS to ensure voter registration processes are executed in compliance with House Bill 2177. • Documentation trails must be complete and verifiable to support accountability, enable timely issue resolution, and ensure compliance with legal and operational standards. Condition: • In a sample of 35 signature file transfers analyzed between January 1, 2024, to March 25, 2025, system log documentation of outbound transfer times was unavailable for 3 of the transfers. • The remaining 32 files had complete and timely records of both inbound and outbound transfers. Cause: • The ODOT Information Services (IS) team was unable to retrieve transfer time records for the affected dates due to system log retention practices. • There is no formal policy requiring the consistent capture and retention of outbound transfer metadata. Effect: • Lack of available system logs reduce the ability to verify timely processing and successful transmission of voter registration data. • This gap could hinder compliance verification, delay issue resolution in the event of a dispute or system failure and reduce confidence in the integrity of the OMV Program's data handling processes.	
Recommendations	Management Response
6.1 Implement a formal logging and retention policy for all OMV-related file transfers, ensuring that both inbound and outbound transfer logs are consistently retained for a sufficient duration for audit purposes.	Responsible: ODOT IS Agree or Disagree: Agree Action Plan: ODOT IS will draft and ratify an official policy governing the logging and retention of OMV related transfers. Estimated Completion Date: July 2025

6.2 Consider enhancing system capabilities or procedures to sufficiently retain outbound transfer logs and metadata for all signature files.

Responsible: ODOT IS

Agree or Disagree: Agree

Action Plan: ODOT IS will implement an approach to retain OMV related transfer metadata and log information to provide sufficient ability to review and audit in the future.

Estimated Completion Date: August 2025

6.3 Conduct periodic audits of file transfer logs to ensure completeness and identify any recurring gaps in documentation.

Responsible: SOS Elections Division

Agree or Disagree: Agree

Action Plan: ODOT-IS developed a daily report of file transfers between DMV and SOS that is emailed to stakeholders each evening. This emailed report includes a comparison of inbound/outbound signature file transfers and is reviewed daily by SOS-Elections staff. SOS-ISD/Elections and ODOT-IS/Program Services will conduct periodic audits of file transfer logs during regular meetings.

Estimated Completion Date: August 2025

Detailed Finding

7. Lack of Formal Process for Tracking and Resolving System Failure Notifications

Risk: Moderate

Criteria:

- In accordance with the SOS OMV Transfer and Processing Recovery v1.1 procedure (dated July 29, 2021), the following requirements apply to the handling of system-generated failure notifications:
 - Must receive and review all failure notifications by 8:30 AM each business day
 - Logged and tracked in a centralized system
 - Investigated and resolved in a timely manner
 - Supported by documentation evidencing resolution and closeout
- Additionally, guidance from NIST 800-53 emphasizes the importance of:
 - Monitoring and documenting system incidents, including failure notifications
 - Reporting and tracking incidents to ensure appropriate response and resolution
 - Establishing formal procedures for incident handling, including defined roles and responsibilities
 - Reviewing and analyzing system logs to detect and respond to anomalies
- These requirements enable the integrity and reliability of voter registration data transfers between DMV and SOS and help ensure accountability and operational continuity.

Condition:

- There is currently no formalized and documented process in place within DMV or SOS for tracking and resolution of system-generated failure notifications.
- Notifications are handled through a centralized TEAMS channel between the two agencies, but there are no centralized documentation or escalation protocols.

Cause:

- Responsibilities for monitoring and resolving system errors are not clearly defined or enforced across agencies.
- There is overreliance on informal communication channels and manual intervention.

Effect:

- System errors may go unresolved or be addressed inconsistently, leading to delays or failures in voter registration data transmission.
- Incomplete or undocumented resolution processes reduce data integrity and increase the risk of non-compliance with state and federal legislation.
- The absence of a centralized tracking mechanism limits visibility into recurring issues and weakens accountability.

Recommendations	Management Response
7.1 Expand the current centralized failure notification channel to add a consistent mechanism to log, monitor, and document all system-generated errors across both agencies.	Responsible: ODOT IS Agree or Disagree: Agree Action Plan: ODOT will work with SOS IS and Elections groups to expand the current communication channel to include a centralized mechanism to log, monitor, and document all OMV system generated errors across DMV and SOS. Estimated Completion Date: September 2025
7.2 Develop formal procedures for investigating, resolving, and closing out failure notifications. These procedures should include defined timelines, escalation protocols, and clearly assigned responsibilities.	Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: SOS-ISD/Elections and ODOT-IS/Program Services currently manage issue escalation ad hoc via email and chat. SOS-Elections will work with ODOT-IS to establish a centralized OMV failure tracking and resolution log with cross references to supporting documentation, current issue status, and the final disposition. SOS-ISD/Elections and ODOT-IS/Program Services will conduct periodic audits of OMV system failure tracking and resolution logs during regular meetings. Estimated Completion Date: September 2025

	Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: SOS-ISD/Elections and ODOT-IS/Program Services currently manage issues ad hoc via email and chat. SOS-Elections will work with ODOT-IS to establish an OMV issue management lifecycle. Estimated Completion Date: September 2025
	Responsible: ODOT IS Agree or Disagree: Agree Action Plan: ODOT IS will develop a plan and cadence for reviews of transfer health and issue occurrence and resolutions to identify potential process improvements. Estimated Completion Date: September 2025
7.3 Conduct periodic assessments of failure logs to identify recurring issues, assess resolution timeliness, and implement system improvements.	Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: SOS-ISD/Elections and ODOT-IS/Program Services have started an ongoing cadence of monthly meetings. The group has also agreed to ramp up to meet every two weeks during periods of time when additional coordination and effort are required for a specific initiative or effort. SOS-Election will plan with ODOT-IS a regular cadence of reviews of transfer logs and potential process. Estimated Completion Date: September 2025
7.4 Train relevant staff on the new procedures for investigating, resolving, and closing out failure notifications, and ensure accountability through regular audits and performance monitoring.	Responsible: ODOT IS Agree or Disagree: Agree Action Plan: ODOT IS will develop and conduct training on newly established protocols for managing and completing transfer failure issues. This will include periodic reviews for performance. Estimated Completion Date: October 2025 Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: SOS-ISD/Elections and ODOT-IS/Program Services will coordinate to develop training on procedures for managing and resolving system failure issues, including periodic reviews of established protocols. SOS-Elections will conduct training annually for all OMV users. Estimated Completion Date: October 2025

Detailed Finding

8. User Access Reviews Not Performed for Systems Supporting the OMV Program

Risk: Moderate

Criteria:

- In accordance with the Oregon Motor Voter law (House Bill 2177, 2015), the Oregon DMV is required to securely transmit sensitive personal information including legal name, date of birth, residence, and citizenship status to the Secretary of State's Elections Division for voter registration purposes.
- Additionally, guidance from NIST 800-53 emphasizes the importance of:
 - Role based access controls that restrict access to authorized personnel only
 - Periodic user access reviews to validate the appropriateness of access rights
 - Timely removal of access for users whose roles no longer require it
- These requirements help to ensure the confidentiality, integrity, and availability of the data and systems supporting the OMV Program.

Condition:

- Formal user access reviews are not performed for users with access to the OMV system.
- Formal user access reviews are not performed for administrative access to MOVEit (including MOVEit Transfer) or the OMV system.
- Redundant administrative user groups were identified within MOVEit.
- Two OMV system administrative users were also assigned unnecessary non-administrative user roles, though these did not provide additional access beyond what is already included within their application administrator role.

Cause:

- There is no formalized policy or procedure requiring periodic user access reviews for OMV-related systems.
- Policies and processes for user account management vary across systems, due to various departments or agencies owning/administering systems.
- An additional MOVEit administrative user group was created to align with the updated name for the relevant IT department/group; the original user group was retained out of concern that some users may still require access through it.

Effect:

- Inappropriate user access may persist, increasing the risk of unauthorized access to data and system changes, compromising data integrity and transmission reliability, as information may be altered, corrupted, or fail to transmit in a complete and accurate manner.
- The absence of regular user access reviews and automated controls weakens the overall security posture of the OMV Program.
- Redundant user groups increase the administrative burden and likelihood that access may not be properly managed, potentially resulting in inappropriate access.

Note: OLIVR user account management was recently audited by the Oregon SOS Audits Division¹ in report 2024-28 published October 2024. The report included findings and related recommendations to improve the user account management processes, and the ODOT IS team indicated they are currently in the process of remediating those items. As a result, the audit team did not perform testing procedures for the OLIVR system.

Recommendations

8.1 Establish and document a standard formal administrative user evaluation policy for MOVEit and MOVEit Transfer.

Management Response

Responsible: ODOT IS

Agree or Disagree: Agree

¹ [Oregon Driver and Motor Vehicle Services Division Licensing and Registration System Accurately Assesses and Collects Fees, but Security Processes Need Improvement](#)

Assign clear ownership for conducting and documenting periodic access assessments (e.g., quarterly or semi-annually). Implement a centralized tracking mechanism to log user access review dates, findings, and remediation actions.	Action Plan: ODOT IS will develop a procedure, consistent with statewide security standards, to conduct administrative user access reviews for MOVEit and MOVEit Transfers on a defined cadence. ODOT IS will establish a tracking mechanism to document reviews, findings, and remediation actions. Estimated Completion date: December 2025
8.2 Establish and document a standard formal user and administrative access evaluation policy for the OMV system. Assign clear ownership for conducting and documenting periodic access assessments (e.g., quarterly or semi-annually). Implement a centralized tracking mechanism to log user access review dates, findings, and remediation actions.	Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: SOS-ISD will provide a standard formal user and administration access evaluation policy that will be updated by SOS-Elections and implemented for OMV Program users. Estimated Completion Date: August 2025
8.3 Remove or consolidate redundant administrative user groups within MOVEit.	Responsible: ODOT IS Agree or Disagree: Agree Action Plan: ODOT has already taken action to remove redundant administrative user groups. Estimated Completion Date: Completed June 2025
8.4 Remove unnecessary user roles for the two identified OMV system administrators.	Responsible: SOS Elections Division Agree or Disagree: Agree Action Plan: SOS-Elections will work with SOS-ISD to remove unnecessary user roles for OMV system administrators. Estimated Completion Date: July 2025

Process Improvement Opportunities

While several areas of our audit did not result in formal findings, the audit team identified opportunities to further strengthen and optimize existing processes. These enhancements are intended to build on current strengths and promote long-term program sustainability and efficiency.

1. Interagency Agreements

Observation: MOUs and amendments between ODOT and SOS were complete, current, and aligned with House Bill 2177.

Process Improvement Opportunity:

To further enhance operational efficiency and inter-agency coordination, the following improvements are recommended for both ODOT and SOS:

- Implement a standardized MOU template.
- Consolidate amendments into a single reference document.
- Establish a regular evaluation and distribution cycle to ensure all stakeholders are informed of updates.

2. Configuration Change Management

Observation: System configuration and filtering logic were found to align with OMV Program requirements, with no exceptions noted.

Process Improvement Opportunity:

To maintain a strong control environment and ensure continued alignment with program standards, the following enhancements could be considered for both ODOT and SOS:

- Introduce a centralized log for configuration changes.
- Conduct periodic assessments to ensure continued alignment with program criteria.

3. SOS Monthly Audit

Observation: The first monthly audit was completed on time, with all 176 sampled records containing complete AVR eligibility data. One known issue was appropriately documented and tracked.

Process Improvement Opportunity:

To institutionalize this process, SOS could consider the following actions:

- Develop a formal monthly audit procedure guide.
- Define roles and responsibilities for audit execution and follow-up.
- Establish a feedback loop to incorporate audit results into continuous improvement efforts.

4. Secretary of State Oversight and Internal Audit Coordination

Observation: The SOS Elections Division plays a central role in the OMV Program by receiving and processing voter registration data transmitted by ODOT's DMV, which prompts the OMV registration process. The SOS Audits Division serves as the state's chief auditor of public accounts and is responsible for conducting performance and financial audits across state agencies. However, there is no dedicated internal audit function within the SOS to help provide OMV program oversight.

Process Improvement Opportunity for SOS:

To enhance program accountability and strengthen internal controls, the SOS could consider establishing or designating a dedicated internal audit capability. This function could:

- Conduct periodic reviews of OMV data intake, eligibility filtering, and voter registration processing.
- Monitor compliance with interagency agreements and statutory requirements.
- Evaluate the effectiveness of corrective actions and policy updates.
- Provide independent assurance to leadership and stakeholders on the integrity of the OMV process.

This opportunity aligns with best practices outlined in Yellow Book section 8.84, which encourages government entities to implement internal audit functions that provide objective assurance and support continuous improvement. A dedicated audit capability would also support the SOS' broader mission to protect the public interest and improve government operations.