





Arizona Department of Transportation

24-Month Followup of Sunset Review Report 23-110

The September 2023 Arizona Department of Transportation (Department) performance audit and sunset review was the third of 3 audit reports we issued as part of the Department’s sunset review.¹ Our performance audit and sunset review found that the Department developed processes to meet various statutory responsibilities but failed to fully address fraud and security incidents, potentially not notifying affected customers and not recovering public monies, and had identified but not yet addressed issues related to legislative appropriations for transportation purposes. We made **25** recommendations to the Department.

Department’s status in implementing 25 recommendations

Implementation status	Number of recommendations
 Implemented	18 recommendations
 Implemented in a different manner	3 recommendations
 Partially implemented	1 recommendation
 In process	3 recommendations

¹ The first performance audit assessed whether the Department’s Motor Vehicle Division (MVD) ensured authorized third parties issued vehicle titles, driver licenses, and identification cards (IDs) to only qualified/authorized individuals, and the second performance audit assessed whether MVD inspected commercial driver license examination providers and examiners within federally required time frames and consistently took remedial action in response to inspection violations it identified. For more information on these performance audits, including any applicable followup reports, see Report 23-105 and Report 23-106.

In addition, this followup report provides our review of the Department's information technology (IT) risk assessment and management for its MVD system, including the Department's role in protecting, maintaining, and facilitating the appropriate use of MVD data for voter registration application purposes (see explanation for Recommendation 7 for additional information on the risk we identified during the previous followup). The Department has implemented, implemented in a different manner, or partially implemented 22 of 25 recommendations directed to it. Further, if the Department follows its reported plans for implementing the remaining 3 recommendations, it should fully implement all recommendations prior to its next sunset review, which is due to the Legislature by October 1, 2031. Therefore, unless otherwise directed by the Joint Legislative Audit Committee, this report concludes our followup work on the Department's efforts to implement the recommendations from the September 2023 sunset review report.

Recommendations to the Department

Finding 1: Department failed to fully address fraud and security incidents, which resulted in it potentially not notifying affected customers, not recovering \$198,358 of public monies, and possibly hampering authorities' response

1. The Department should follow its policies and procedures to comply with State laws related to security incidents, including investigating security incidents and timely notifying all affected customers if it determines that a security breach occurred.

▶ Status: **Implemented at 6 months.**

As of July 2024, the Department had received and investigated 2 reports of potential security incidents since November 2023 and determined that there was no evidence that a security incident, security breach, or system compromise occurred in either case. Additionally, the Department followed its policies and procedures to comply with State laws related to security incidents, including conducting investigations to promptly determine whether the reported activities were security incidents or whether system security breaches had occurred. Because the Department determined that there was no evidence that a security incident, security breach, or system compromise occurred, the Department was not statutorily required to notify affected customers or report these cases to the Arizona Department of Homeland Security. As of July 2024, the Department reported that it had not received any additional reports of potential security incidents.

2. The Department should conduct a risk-based review of MVD system customer account data from 2019 through 2022 to determine whether any other customer accounts exhibit similar potentially fraudulent patterns and conduct all related investigations and required followup.

▶ Status: **Implemented at 6 months.**

The Department conducted a risk-based review of MVD system customer account data to identify customer accounts that exhibited potentially fraudulent patterns and identified 52 customer accounts that it had not previously identified. Specifically, the Department reported that it queried MVD system customer account data from January 2019 to January 2024 to identify accounts that had specific risk factors that could indicate a similar potentially fraudulent pattern, such as a customer adding monies to the account and making a transfer or disbursement out of the account. Based on its review of each of the identified accounts, the Department determined that none exhibited the potentially fraudulent behavior reported in our September 2023 sunset review and that all associated transactions appear to be failed payments or customer confusion. Our review of MVD records for a judgmental sample of 5 of 52 Department-identified customer accounts with the highest transaction amounts that appeared fraudulent found that the Department had conducted related research and followup on all customer accounts to determine that associated transactions did not appear fraudulent. Specifically, our review found that the Department's research and followup reasonably determined that account transactions did not exhibit the potentially fraudulent patterns identified in our September 2023 sunset review.

3. The Department should, at a minimum, comprehensively review and investigate the identified 260 customer accounts to determine if potential security incidents occurred. If it identifies security incidents after reviewing and investigating the 260 customer accounts, the Department should report to and work with the Arizona Department of Homeland Security to address these incidents.

► Status: **Partially implemented at 6 months.**

The Department's Office of the Inspector General (OIG) performed a review of the 260 customer accounts identified in our September 2023 sunset review and 12 additional accounts it identified after our report was issued by tracing money from fraudulent transactions into or through these 12 accounts and reported it did not discover any additional information related to suspects involved in perpetrating fraud. Our review of Department data and the OIG's investigation documentation for 6 of 272 accounts found that the Department took various steps to review and investigate the customer accounts, such as sending victim-notification letters to customers potentially impacted by fraudulent activity, performing additional investigations of accounts it determined required further review, and reviewing additional information related to fraudulent account activity it received from customers it contacted. The Department also reported to the Arizona Department of Homeland Security in September 2023 that a potential security incident had occurred related to these accounts.

However, the Department's review and investigation of these accounts did not include analyzing system logs related to the accounts from the time period it reviewed. System logs are a record of events occurring within an organization's systems and networks. According to the Department, its system logs include records such as changes in system configuration, access attempts, and network activity and thus could help the Department determine whether security breaches occurred. The Department reported that it only retains active MVD system logs for 30 days and overall log data for 1 year,

and the potential security incidents, having occurred as of August 2022, were more than 1 year old. As such, the Department reported it could not work further with the Arizona Department of Homeland Security to address the potential security incidents, such as remediating any breaches that may have occurred, because it lacked system log data to review. The Arizona Department of Homeland Security reported that it continues to work with the Department to identify and manage cyber risks while further enhancing the Department's cybersecurity posture where possible, regardless of the availability of specific system log data.

4. The Department should develop and implement policies and procedures for timely and effective reporting of fraud to appropriate authorities, as required by the *State of Arizona Accounting Manual* (SAAM).

▶ Status: **Implemented at 24 months.**

Since our previous followup in April 2025, the Department has timely reported fraud to appropriate authorities, as required by the SAAM. For example, between May 2025 and June 2025, the Department timely reported 302 instances of potential fraud to the Arizona Department of Administration (ADOA), as required by the SAAM. In addition, in June 2025, ADOA revised the SAAM requirements for reporting allegations of fraud to appropriate authorities. For example, ADOA changed the requirement from reporting all suspected allegations to only reporting credible allegations that result or may result in a possible financial loss or risk to the State.² Further, ADOA changed the reporting requirement from 1 business day to 1 week. The Department revised its policies and procedures for reporting fraud to appropriate authorities in August 2025 to align with the June 2025 SAAM revisions. As of October 2025, the Department reported it has not identified any credible allegations of fraud since we published our last followup in April 2025.

5. The Department should continue its efforts to recover all monies it had not recovered.

▶ Status: **Implemented at 6 months.**

Our review of Department data found that, as of October 2024, of the approximately \$198,000 of unrecovered monies reported in our September 2023 sunset review, the Department had:³

- Referred approximately \$128,000 associated with 51 customer accounts to the Arizona Attorney General's Office for collections.

² This SAAM revision applies if an agency has an Office of the Inspector General or an equivalent function, such as an internal auditor or audit team. The Department has an Office of the Inspector General that is required by Department policy to review suspected allegations of fraud and determine if the allegation is credible.

³ The Department's continued efforts to recover all monies identified during the audit did not include all 260 customer accounts. Specifically, at the time of our September 2023 sunset review, not all 260 customer accounts identified owed monies to the Department. Additionally, some customer accounts included both monies that the Department collected and monies referred to the Arizona Attorney General's Office.

- Referred or plans to refer approximately \$41,000 associated with 70 customer accounts to the Arizona Attorney General's Office to be written off. Specifically, the Department referred approximately \$39,000 to be written off for various reasons, such as the customer not being responsible for the charges on the account. The Department reported it intends to refer the remaining \$2,000 in February 2025 during the Arizona Attorney General's annual write-off process.
- Collected approximately \$27,000 associated with 49 customer accounts. The Department reported that it collected these monies through customer payments and sweeps of monies in customer accounts.
- Determined that approximately \$2,000 associated with 13 customer accounts was related to nonfraudulent charges, such as fees for abandoned vehicles, reinstatements, and suspended licenses, associated with the customer accounts that exhibited fraudulent patterns.

6. The Department should establish a documented, comprehensive process to effectively manage MVD fraud risk, including conducting regular fraud risk assessments, identifying risk responses and anti-fraud strategies, designing and implementing specific control activities to prevent and detect fraud, and monitoring and evaluating its fraud risk management process.

▶ Status: **Implemented at 24 months.**

During our initial followup in April 2025, we found that the Department had established a documented, comprehensive process to manage MVD fraud risk that included conducting regular fraud risk assessments, identifying risk responses and anti-fraud strategies, designing and implementing specific control activities to prevent and detect fraud, and monitoring and evaluating its fraud risk. Since our initial followup, the Department has continued to implement these processes. For example, the Department established a fraud working group that has continued to meet monthly to conduct regular risk assessments and identify risk responses and anti-fraud strategies. Additionally, the Department has continued to require its OIG to monitor a Department-wide fraud hotline, which accepts fraud tips from Department staff and members. Further, the Department has continued to develop its process for designing specific control activities to prevent and detect fraud by establishing written policies in August 2025 that outline expectations for supervisors to deter and prevent acts of misconduct and fraud. For example, its policy identifies splitting key duties among employees and instituting safeguards over cash, inventory, and other assets as mechanisms for deterring and preventing fraud. The Department has also established safeguards over cash handling, including segregation of duties for handling and depositing cash receipts.

7. The Department should establish a documented and comprehensive Information Technology (IT) risk assessment process that involves members of the Department's administration and Information Technology Group for its MVD system and that includes:

a. Determining the IT risks that MVD faces as it seeks to achieve its objectives.

▶ Status: **Implemented in a different manner at 24 months.**

As reported in our previous followup, the Department had established a Department-wide IT risk management plan and MVD had developed a security plan consistent with the Department's IT risk-management plan. For example, the Department's IT risk-management plan outlined a process for the Department to determine appropriate responses to all information system risks above its risk tolerance to help mitigate the unauthorized access and use, modification, or loss of sensitive information and the impact a system breach could have on each system's objectives. Additionally, the IT risk-management plan required the Department to implement security controls based on its risk tolerances.

However, during our previous followup, we identified a risk that other State agencies could be using the Department's data incorrectly, and the Department had not updated its IT risk-assessment process to include this risk that we identified and brought to its attention. As of November 2025, the Department reported that this risk has not been incorporated into its risk-assessment process, and it has instead focused on ensuring it has data-sharing agreements in place with organizations that use its data. According to Department data, as of October 2025, the Department has signed active data-sharing agreements with 277 government agencies and 76 commercial entities that have access to Department data. The Department also requires that its data-sharing agreements be renewed annually and reported that its data-sharing agreements include a list of all shared data to facilitate discussion of the usability of the data for operational decision making by the receiving organization. As such, although the Department has not updated its IT risk-assessment process to include the risk of other agencies using information from the Department's system incorrectly, it has taken steps to mitigate this risk by entering into, tracking, and regularly updating data-sharing agreements with all government agencies and private businesses that have access to and use MVD data.

b. Providing the basis for developing appropriate responses based on identified risk tolerances and specific potential risks to which MVD might be subjected.

▶ Status: **Implemented in a different manner at 24 months.**

See explanation for Recommendation 7a.

- c. Analyzing identified risks and developing a plan to respond within the context of the MVD's defined objectives and risk tolerances, including the risk of unauthorized access and use, modification, or loss of sensitive information.
 - ▶ Status: **Implemented in a different manner at 24 months.**

See explanation for Recommendation 7a.

Sunset Factor 2: The extent to which the Department has met its statutory objective and purpose and the efficiency with which it has operated.

- 8. The Department should comply with statutory requirements related to the Board's public hearing for the Construction Program and the Construction Program's structure. If the Department believes that changes to these statutory requirements are needed, it should work with the Legislature to modify statute.

- ▶ Status: **Implemented at 6 months.**

As of May 2024, the Department had complied with the statutory requirements related to the State Transportation Board's (Board) public hearing for the 5-Year Transportation Facilities Construction Program (Construction Program). Specifically, the Department published notices of the Board's public hearing for the 2025-2029 Construction Program in a newspaper of general circulation prior to the first Monday in May 2024 and held the public hearing prior to the third Monday in May 2024, as required by Arizona Revised Statutes (A.R.S.) §28-6952(B). Additionally, in the 2025-2029 Construction Program, the Department listed projects by priority and grouped them in the fiscal year that the Department estimates construction will begin, as required by A.R.S. §28-6954(A)(3).

Further, during the 2024 legislative session, the Department worked with the Legislature to modify the statutory requirements related to the Board's public hearing for the Construction Program. Specifically, effective September 14, 2024, Laws 2024, Ch. 208, revised A.R.S. §28-6952(B) to require the Board to publish a notice of public hearing for the Construction Program on or before May 1 of each year rather than the first Monday in May and removed the requirement that the Board hold the public hearing before the third Monday in May.

- 9. The Department should continue to develop and implement a cost-estimation tool to standardize transportation project cost estimates, including accounting for inflation in the cost estimates. Once implemented, the Department should conduct an analysis to determine whether its cost estimates are more accurate and make any necessary changes to its cost-estimation tool, as appropriate.

- ▶ Status: **Implementation in process.**

As discussed in our previous followup, as of March 2024, the Department had adopted a cost-estimation tool to develop cost estimates for all State-wide transportation projects that accounted for inflation. Although the Department has continued to use this cost-

estimation tool since our initial followup, according to the Department, as of October 2025, it did not have enough completed transportation projects that used the new cost-estimation tool to determine whether the cost-estimation tool is working as intended. Further, the Department reported that it will take approximately 2 to 3 years until the Department can conduct an analysis to determine whether its cost estimates are more accurate than its previous cost estimates, which did not always include inflation, causing some transportation projects' actual costs to be higher than estimated.

10. The Department should develop and implement a documented stakeholder education process for obtaining and providing information related to transportation projects the Legislature directs it to conduct to enhance transparency and communication related to these projects, including:

a. Providing stakeholder education about the type of information it considers necessary to scope a transportation project and the type of information it can provide to stakeholders, including information related to project costs.

▶ Status: **Implemented at 6 months.**

The Department has provided stakeholder education related to transportation projects. Specifically, the Department held a legislative summit in November 2023 attended by legislators from the Senate and the House of Representatives, Governor's Office staff, and industry representatives during which it presented information regarding funding sources for transportation projects, project programming, project delivery, and current needs for pavement rehabilitation and preservation in the State. The Department reported it intends to hold legislative summits at least annually and anticipates the next summit will occur after the 2024 elections. Additionally, the Department developed a process to annually obtain and provide information related to transportation projects legislators are interested in proposing through a form. In January 2024, the Department sent this form to legislators, and it received 3 completed forms from 2 legislators regarding 6 potential transportation projects. Our review of the Department's response to 1 of the legislator's completed forms related to 4 transportation projects found that the Department provided the legislator with cost estimates for each of the projects.

b. Expanding its reporting to the Legislature to periodically provide the Legislature with information about all legislative appropriations for specific transportation purposes, including appropriations without a legally mandated reporting requirement. Information that the Department could provide includes information on appropriations and associated transportation projects such as legislative and updated scopes and budgets, statuses, monies spent, and estimated completion dates.

▶ Status: **Implemented at 6 months.**

As of September 2024, the Department had submitted 4 quarterly reports to the Legislature and the Governor's Office on legislatively appropriated transportation projects for fiscal year 2024 that included information for legislatively appropriated

projects, including projects without a legally mandated reporting requirement. These reports included information such as each project's name and location, appropriated and budgeted monies, current estimated project costs, expenditures to date, estimated completion dates, and status. The Department reported that it intends to continue submitting quarterly reports with this information for projects without a legally mandated reporting requirement in the future.

- 11.** The Department should develop and implement a process to seek legislative input on potential transportation projects, such as through its Planning to Programming (P2P) process initial request for project proposals and stakeholder meetings.

▶ Status: **Implemented at 6 months.**

The Department developed and implemented a process to seek legislative input on potential transportation projects through its planning to programming process initial request for project proposals. Specifically, the Department developed procedures for distributing a Construction Program project nomination form to legislators annually, and the Department distributed this form to the Legislature for project nominations in March 2024. In response to its project nomination form, the Department received 9 project nominations from legislators for projects in Yavapai, Coconino, Navajo, and Graham Counties. The Department communicated information to legislators regarding the status of their project nominations in July 2024. As of October 2024, the Department had reviewed 6 of 9 project nominations from legislators for potential inclusion in the fiscal years 2026 through 2030 Construction Program. The Department will draft the tentative fiscal years 2026 through 2030 Construction Program, including determining whether to include these projects, by December 31, 2024. The 3 remaining project nominations were not reviewed for potential inclusion in the fiscal years 2026 through 2030 Construction Program because the Department does not have planning responsibilities for the roadways that were nominated for these projects.

- 12.** The Department should develop and implement an IT contingency plan that contains all required elements to ensure compliance with State IT requirements, including procedures for recovering and restoring its MVD MAX system.

▶ Status: **Implemented at 6 months.**

As of January 2024, the Department had developed and implemented an IT contingency plan for its MVD MAX system that includes procedures for recovering and restoring the MVD MAX system.

- 13.** The Department should develop and implement documented processes to address identified MVD MAX access control gaps, including monitoring users for inactivity and restricting employees from accessing their own MVD records.

▶ Status: **Implemented at 6 months.**

The Department developed and implemented documented processes for monitoring users for inactivity and restricting employees from accessing their own MVD records.

Specifically, the Department developed an automated email notification that it sends to inactive users and a procedure to deactivate user accounts after 90 days of inactivity. In July 2024, the Department deactivated 78 inactive users. Additionally, in February 2024, the Department implemented changes to the MVD MAX system to restrict employees from accessing their personal MVD records.

14. The Department should train staff who use purchasing cards, travel cards, and central travel accounts and supervisory staff responsible for reviewing related transactions to ensure that these transactions comply with the SAAM and Department policies and procedures.

▶ Status: **Implemented at 24 months.**

As of April 2025, the Department had revised its policies to require staff who use purchasing cards, travel cards, and central travel accounts to take annual trainings on card and account usage. However, as of October 2025, not all Department staff who use purchasing cards, travel cards, and central travel accounts had taken the annual training. According to Department data, as of October 2025:

- 8 of 195 employees who use purchasing cards had not completed the required annual purchasing card training, including 4 supervisory staff responsible for reviewing transactions.
- 6 of 272 employees who use travel cards had not completed at least 1 of the required annual travel card trainings, including 1 employee who had not completed either of the trainings required for a travel card.
- 2 of 209 employees who use central travel accounts had not completed the associated annual training.

The Department reported that in all of these instances, the associated cards were closed due to the unfulfilled training requirement or lack of card activity, and provided documentation supporting these closures.

Sunset Factor 3: The extent to which the Department serves the entire State rather than specific interests.

15. The Department should continue finalizing the MVD field office location analysis report and develop and implement a plan for addressing the report's findings and proposals.

▶ Status: **Implemented at 6 months.**

The Department finalized the MVD field office location analysis report in December 2023. The report included proposals for 3 new MVD field offices in the community of San Tan Valley, the City of Buckeye, and the Happy Valley area of the City of Phoenix, and the potential consolidation of 2 MVD field offices in the Phoenix area. Additionally, the Department has developed a process for creating and updating future MVD field office location analysis reports in odd-numbered calendar years. Further, as of August 2024, the Department's fiscal year 2026 through 2032 capital improvement plan had

been approved by the Department's Facility Advisory Committee and included plans to address the MVD field office location analysis report's proposals for 3 new MVD field office locations. For example, according to the Department's capital improvement plan, the Department plans to purchase land for the first new MVD field office in fiscal year 2026 and begin construction in fiscal year 2028.

16. The Department should implement its conflict-of-interest policy to help ensure compliance with State conflict-of-interest requirements and recommended practices by:

a. Requiring employees/public officers to annually complete a disclosure form, including attesting that no conflicts exist, if applicable.

▶ Status: **Implemented at 24 months.**

As reported in our previous followup, the Department's conflict-of-interest policies and procedures require that its employees and public officers annually complete a disclosure form attesting that no conflicts exist, if applicable. Effective January 2025, the Department updated its policies and procedures to further require its employees and officers to complete a disclosure form within 24 hours in the event that a conflict arises outside of initial hire or annual completion. As of October 2025, nearly all, or 3,589 of 3,595 employees had completed a disclosure form for calendar year 2025. According to the Department, the remaining 6 employees who had not completed a disclosure form for calendar year 2025 had not done so because they were either on extended leave or recently rehired. Further, as of October 2025, all 7 Board members had completed a disclosure form for calendar year 2025.

b. Storing all substantial interest disclosures in a special file available for public inspection.

▶ Status: **Implemented at 24 months.**

Similar to our previous followup, as of October 2025, we observed the Department's special file of substantial interest disclosures and found that the Department had stored the disclosure forms of employees with a disclosed substantial interest within its special file. Additionally, as discussed in recommendation 16a, as of October 2025, nearly all of the Department's 3,594 employees and all 7 Board members had completed a disclosure form for calendar year 2025.

c. Providing periodic training on its conflict-of-interest policy to all employees and public officers.

▶ Status: **Implemented at 24 months.**

As reported in our previous followup, the Department's conflict-of-interest policy requires employees and public officers to complete conflict-of-interest training every 3 years. As of October 2025, nearly all 3,595 employees and all 7 Board members had completed the required training, with the exception of 2 employees the Department reported were either on extended leave or recently rehired and within their 90-day time frame for completing required trainings.

Sunset Factor 5: The extent to which the Department has encouraged input from the public before adopting its rules and the extent to which it has informed the public as to its actions and their expected impact on the public.

17. The Department should comply with open meeting law requirements, including:

- a. Ensuring Board and Committee meeting notices are posted at least 24 hours in advance in all locations identified in their disclosure statements.

▶ Status: **Implementation in process.**

Our review of 4 public meetings held between October and November 2025—2 Board and 2 Priority Planning Advisory Committee (Committee) meetings—found that the Board complied with the open meeting law requirement to post meeting notices at least 24 hours in advance in all locations identified in its disclosure statements, similar to what we reported in our previous followup. Additionally, the Committee posted meeting notices at all physical locations identified in its disclosure statement for 1 Committee meeting we reviewed, which represented progress since our previous followup; however, it did not do so for the second meeting we reviewed. As discussed in Recommendation 18, the Department lacks staff guidance for posting Committee meeting notices in all locations, which may have contributed to the Committee inconsistently complying with the open meeting law requirement to post meeting notices at least 24 hours in advance in all locations identified in its disclosure statement. According to the Department, in February 2026, it clarified its posting process with the applicable staff. Further, as discussed in Recommendation 18, in March 2026, the Department reported it was in the process of updating its procedures to include guidance for staff to post meeting notices in all locations identified in the Committee’s disclosure statement, and it expected to complete these revisions by the end of June 2026.

- b. Ensuring minutes or recordings are available upon request within 3 working days of Board and Committee meetings.

▶ Status: **Implemented at 6 months.**

Our review of 4 public meetings held between April and August 2024—2 Board and 2 Committee meetings—found that the Department made all Board and Committee meeting recordings available within 3 working days.

18. The Department should develop and implement open meeting law policies and procedures to help ensure its compliance with open meeting law requirements.

▶ Status: **Implementation in process.**

As reported in our previous followup, the Department developed some open meeting law procedures for the Board and Committee to help ensure its compliance with open meeting law requirements, including procedures for posting recordings of meetings and meeting notices. However, similar to our previous followup, as of October 2025,

the Department's open meeting law procedures for the Committee did not include guidance for staff to post meeting notices in all locations identified in the Committee's disclosure statement. Specifically, although the Department updated its procedures in May 2025 to provide staff guidance for posting Committee meeting notices in some locations, its procedures do not include guidance for staff to post meeting notices at 1 of the 2 physical locations identified in the Committee's disclosure statement. This lack of guidance may have contributed to the Committee not fully complying with the open meeting law requirement to post meeting notices at least 24 hours in advance in all locations identified in its disclosure statement, as discussed in Recommendation 17a. According to the Department, the staff person responsible for updating the procedures left the Department in March 2025, and further updates to the procedures were not finalized. In March 2026, the Department reported it was in the process of updating its procedures to include guidance for staff to post meeting notices in all locations identified in the Committee's disclosure statement, and it expected to complete these revisions by the end of June 2026.

Sunset Factor 6: The extent to which the Department has been able to investigate and resolve complaints that are within its jurisdiction and the ability of the Department to timely investigate and resolve complaints within its jurisdiction.

- 19.** The Department should implement its MVD procedures for tracking customer complaints against third parties, including complaint resolutions.

▶ Status: **Implemented at 6 months.**

The Department has implemented its MVD procedures for tracking customer complaints against third parties, including complaint resolutions. Specifically, as of December 2023, the Department had developed additional guidance for Department staff on its complaint-tracking procedures, including how to log complaints and their resolution in an MVD tracking document. Additionally, from September 2023 to May 2024, the Department received 10 customer complaints against third parties and tracked these complaints, including tracking complaint resolutions for those complaints that were resolved. Further, according to its MVD tracking document, as of May 2024, the Department had resolved 7 of 10 complaints and was in the process of resolving the remaining complaints, which were received between April and May 2024.