

PERFORMANCE AUDIT REPORT

Pennsylvania Department of Transportation
Governor's Office of Administration

Pennsylvania Motor Voter Process

April 2026



Commonwealth of Pennsylvania
Department of the Auditor General

Timothy L. DeFoor • Auditor General

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TIMOTHY L. DEFOOR
AUDITOR GENERAL

March 10, 2026

The Honorable Michael Carroll
Secretary of Transportation
Pennsylvania Department of Transportation
400 North Street, 8th Floor
Harrisburg, PA 17120

The Honorable Neil Weaver
Secretary
Governor's Office of Administration
210 Finance Building
Harrisburg, PA 17120

Dear Secretaries Carroll and Weaver:

This report contains the results of the Department of the Auditor General's (Department) performance audit of the Pennsylvania Department of Transportation (PennDOT) and the Governor's Office of Administration (OA) regarding the Pennsylvania Motor Voter process.

The performance audit was conducted in accordance with our Department's primary audit authority under Sections 402 and 403 of The Fiscal Code (Code), 72 P.S. §§ 402 and 403;¹ and in accordance with generally accepted Government Auditing Standards, issued by the Comptroller General of the United States.² Those 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 our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Our performance audit covered the period January 1, 2024, through June 30, 2024, and included two objectives: (1) Assess PennDOT's electronic Motor Voter registration process, including the implementation of the state Automatic Voter Registration (AVR) which began on September 19,

¹ 72 P.S. §§ 402 and 403 and *Dep't of the Aud. Gen. v. State Emp. Ret. Sys.*, 860 A.2d 206, 214 (Pa. Cmwlth., 2004) amending the prior decision in *Dep't of the Aud. Gen. v. State Emp. Ret. Sys.*, 836 A.2d 1053, 1069-1070 (Pa. Cmwlth. 2003) which determined that the Auditor General has the authority to conduct performance audits pursuant to **both** Sections 402 and 403 of the Code, and Pa. Const. art. VIII, Sec. 10.

² U.S. Government Accountability Office. *Government Auditing Standards*. 2018 Revision Technical Update April 2021.

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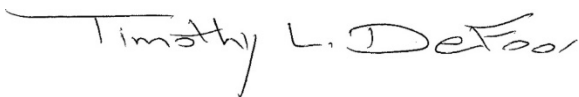
2023, for compliance with the National Voter Registration Act of 1993 (NVRA),³ the corresponding Motor Voter provision in the state Election Code,⁴ any other statutory provision that applies, and any applicable PennDOT guidelines, policies, and procedures; and (2) Determine whether PennDOT's Motor Voter interface files sent to the Pennsylvania Department of State properly excluded non-citizens.

Based on the results of our audit procedures, we did not identify any instances of non-compliance within PennDOT's electronic Motor Voter vendor-managed application as it relates to the NVRA, the Pennsylvania Voter Registration Act, the relevant portions of the Pennsylvania Election Code, and other applicable statutory provisions. However, we did find weaknesses within the Motor Voter process which are contained in **two findings** with **8 recommendations** related to improving the information technology system and process used to apply to register to vote when an individual is at a Photo License Center to acquire a Pennsylvania driver's license, complete a driver's license renewal, or obtain an identification card.

As described in *Finding 1*, we found that PennDOT improperly sent one non-U.S. citizen's application to register to vote to the Department of State due to a manual entry error omitting non-citizen status in PennDOT's Driver's License and Control System during the driver's license application process. Additionally, as described in *Finding 2*, we found that PennDOT and OA failed to implement all appropriate employee user access controls over PennDOT's vendor-managed application supporting the Motor Voter process.

In closing, I want to thank PennDOT and OA for their assistance during this audit. PennDOT and OA management generally agreed with *Finding 1* but disagreed with *Finding 2*. See further comments and our conclusion in the *Pennsylvania Department of Transportation's and the Governor's Office of Administration's Response and Auditor's Conclusion* section of this report. We reserve the right to follow up at an appropriate time to determine whether and to what extent our recommendations have been implemented.

Sincerely,



Timothy L. DeFoor
Auditor General

³ 52 U.S.C. § 20501 et seq. See in particular, Section 20503 (relating to National procedures for voter registration for elections for Federal office), 52 U.S.C. § 20503.

⁴ 25 Pa.C.S. § 1301 et seq. See in particular, Subsection (a)(1) of Section 1323 (relating to Application with driver's license application), 25 Pa.C.S. § 1323(a)(1).

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Executive Summary

This report presents the results of our performance audit of the Pennsylvania Department of Transportation (PennDOT) and the Governor's Office of Administration (OA) regarding the Motor Voter process. The performance audit was conducted in accordance with our Department's primary audit authority under Sections 402 and 403 of The Fiscal Code (Code), 72 P.S. §§ 402 and 403;⁵ and in accordance with generally accepted Government Auditing Standards, issued by the Comptroller General of the United States.⁶

The audit covered the period January 1, 2024, through June 30, 2024, and included the following two audit objectives:

- Assess PennDOT's electronic Motor Voter registration process, including the implementation of the state Automatic Voter Registration (AVR) which began on September 19, 2023, for compliance with the National Voter Registration Act of 1993 (NVRA),⁷ the corresponding Motor Voter provision in the state Election Code,⁸ any other statutory provision that applies, and any applicable PennDOT guidelines, policies, and procedures.
- Determine whether PennDOT's Motor Voter interface files sent to the Pennsylvania Department of State⁹ (DOS) properly excluded non-citizens.

The audit focused on the electronic Motor Voter registration process that is available to customers and administered by PennDOT employees using a vendor-managed application at more than 100 PennDOT Photo License Centers. This process and our audit did not include the review of driver's license, renewal, or identification card applications and the production of camera cards by PennDOT in the Driver's License and Control System (DL&C System).

⁵ 72 P.S. §§ 402 and 403 and *Dep't of the Aud. Gen. v. State Emp. Ret. Sys.*, 860 A.2d 206, 214 (Pa. Cmwlth., 2004) amending the prior decision in *Dep't of the Aud. Gen. v. State Emp. Ret. Sys.*, 836 A.2d 1053, 1069-1070 (Pa. Cmwlth. 2003) which determined that the Auditor General has the authority to conduct performance audits pursuant to **both** Sections 402 and 403 of the Code, and Pa. Const. art. VIII, Sec. 10.

⁶ U.S. Government Accountability Office. *Government Auditing Standards*. 2018 Revision Technical Update April 2021.

⁷ 52 U.S.C. § 20501 et seq. *See in particular*, Section 20503 (relating to National procedures for voter registration for elections for Federal office), 52 U.S.C. § 20503.

⁸ 25 Pa.C.S. § 1301 et seq. *See in particular*, Subsection (a)(1) of Section 1323 (relating to Application with driver's license application), 25 Pa.C.S. § 1323(a)(1).

⁹ DOS and the Statewide Uniform Registry of Electors System was not included in this audit, because this DOS system was previously audited by the Department as a stand-alone audit that included the state's 67 counties' processes and the DOS process.

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Additionally, our audit did not include the DOS' and the counties' processes for voter registration.

Due to the sensitive information and proprietary nature of the Motor Voter process, PennDOT and OA requested three different non-disclosure agreements before information and data needed for this audit was provided. This caused significant delays to our audit process.

Based on the results of our audit procedures, we did not identify any instances of non-compliance within PennDOT's electronic Motor Voter vendor-managed application as it relates to the NVRA, the Pennsylvania Voter Registration Act, the relevant portions of the Pennsylvania Election Code, and other applicable statutory provisions. However, we did find weaknesses within the Motor Voter process which are contained in **two findings** with **8 recommendations** related to improving the information technology system and process used to apply to register to vote when an individual is at a Photo License Center to acquire a Pennsylvania driver's license, complete a driver's license renewal, or obtain an identification (ID) card.

PennDOT and OA generally agreed with *Finding 1's* recommendations and disagreed with *Finding 2's* recommendations. We have included our response in the *Auditor's Conclusion to PennDOT and OA's Response* section of this audit report.

Finding 1 – The Pennsylvania Department of Transportation improperly sent one non-U.S. citizen's application to register to vote to the Department of State.

Using information provided by PennDOT and OA management, we determined there were 210,905 unique voter registration applications transmitted to DOS during the six-month audit period, January 1, 2024, through June 30, 2024. The age and citizenship status for the 210,905 voter registration applications were compared to the information in the DL&C System. For 58 voter registration applications that were identified as having potential exceptions regarding citizenship status, we conducted further analysis to evaluate whether the applicants were citizens and eligible to apply to register to vote. We traced record information transferred to DOS to supporting documentation such as passports, birth certificates, and other supporting data in the DL&C System. Of the 58 voter registration applications requiring further review, we found one non-citizen applied to register to vote and the application was sent to DOS.

PennDOT management explained that due to a manual entry error omitting non-citizen status in the DL&C System during the driver's license application process (not the Motor Voter process), the DL&C camera card did not have the identifying indicator that would have prevented the non-citizen from the option of applying to register to vote. Therefore, the Motor Voter vendor-managed application presented the non-citizen the Motor Voter kiosk screens that allowed the individual to apply to register to vote. (*See Appendix B* of this audit report for the kiosk screens and questions that are prompted.) Although PennDOT staff at the Photo License Center realized

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the individual's driver's license was incorrect and reprinted the driver's license card prior to the person leaving the Photo License Center, PennDOT staff were unable to void the application to register to vote and prevent it from being transmitted to DOS at the end of that day. Further, PennDOT did not establish or implement protocols to proactively notify DOS of errors such as the one that occurred to ensure that the non-citizen's voter registration application process was immediately halted.

We offer three recommendations for PennDOT to require input of citizenship status, implement controls, and follow up with DOS on the exception identified.

Finding 2 – The Pennsylvania Department of Transportation (PennDOT) and the Governor's Office of Administration (OA) failed to implement all appropriate employee user access controls over PennDOT's vendor-managed application supporting the Motor Voter process.

Weaknesses existed related to user access controls over PennDOT's vendor-managed application used to support the Motor Voter process as described in detail in *Finding 2*. Specifically, PennDOT and OA were unable to demonstrate for the audit period which employees had user access to PennDOT's Motor Voter vendor-managed application and whether the employees were assigned appropriate access for their roles and job responsibilities.¹⁰

We also found that PennDOT and OA did not conduct periodic reviews of user access for their employees that had access to the vendor-managed application during the audit period.

The lack of evidence to demonstrate appropriate user access during the audit period, combined with the failure to conduct periodic user access monitoring, could result in inappropriate access to and activity in the vendor-managed application.

We offer two recommendations to OA to update record retention schedules and responsibilities and three recommendations to PennDOT to develop procedures for periodic access reviews, inventory vendor-managed accounts and conduct review of all user accounts.

¹⁰ Employees include individuals contracted by PennDOT and Commonwealth employees, including PennDOT and OA.

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Introduction and Background

Pursuant to Sections 402 and 403 of The Fiscal Code,¹¹ the Department of the Auditor General (Department) conducted a performance audit of the Pennsylvania Department of Transportation (PennDOT) and the Governor's Office of Administration (OA) regarding the Pennsylvania Motor Voter process.

Our performance audit consisted of the following two audit objectives covering the six-month period of January 1, 2024, through June 30, 2024:

1. Assess PennDOT's electronic Motor Voter registration process, including the implementation of the state's Automatic Voter Registration (AVR) which began on September 19, 2023, for compliance with the National Voter Registration Act of 1993 (NVRA),¹² the corresponding Motor Voter provision in the state Election Code,¹³ any other statutory provision that applies, and any applicable PennDOT guidelines, policies, and procedures.
2. Determine whether PennDOT's Motor Voter interface files sent to the Pennsylvania Department of State (DOS) properly excluded non-citizens.

This audit reviewed the information technology system and process used to apply to register to vote when an individual is at a Photo License Center to acquire a Pennsylvania driver's license, complete a driver's license renewal, or obtain an identification (ID) card.¹⁴ The Motor Voter process integrates and transfers electronic information between three different and distinct systems, as follows:

1. PennDOT's Driver's License and Control System (DL&C System);
2. PennDOT's vendor-managed application (vendor-managed application); and
3. DOS' Statewide Uniform Registry of Electors System (DOS' System).

The PennDOT DL&C System is a Commonwealth OA-managed system used to create and maintain driver's license and identification records, including documentation and verification of age, residency, and citizenship information.¹⁵ The PennDOT vendor-managed application is used

¹¹ 72 P.S. §§ 402 and 403.

¹² 52 U.S.C. § 20501 *et seq.* See in particular, Section 20503 (relating to National procedures for voter registration for elections for Federal office), 52 U.S.C. § 20503.

¹³ 25 Pa.C.S. § 1301 *et seq.* See in particular, Subsection (a)(1) of Section 1323 (relating to Application with driver's license application), 25 Pa.C.S. § 1323(a)(1).

¹⁴ For simplicity purposes, when referring to whether the individual is acquiring a driver's license or renewal of the driver's license, we will refer to just the driver's license herein; however, it could be one or the other.

¹⁵ For specificity, PennDOT verifies legal presence of a citizen and non-citizen.

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at PennDOT's Photo License Centers to take pictures, create the cards for a driver's license or ID, and allow an eligible individual to apply to register to vote.¹⁶ DOS' System receives the applications to register to vote (also referred to as 'voter registration applications' throughout this report) electronically from the vendor-managed application.¹⁷ Since PennDOT is the agency that implements and oversees the Motor Voter process and OA manages the administrative controls in the PennDOT DL&C System and the PennDOT vendor-managed application, both PennDOT and OA were auditees of this audit.

The diagram below illustrates the Motor Voter process when an individual is obtaining a driver's license or ID card at a PennDOT Photo License Center.

¹⁶ While PennDOT has both Driver License Centers and Photo License Centers, and while both are co-located at the same facility, the Motor Voter process only takes place at Photo License Centers.

¹⁷ DOS' System was not included in this audit, because this system was previously audited by the Department as a stand-alone audit that included the state's 67 counties' processes and the DOS process.

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Pennsylvania's Motor Voter Process



STEP 2- MOTOR VOTER PROCESS (AUDITED)

During camera card processing at the PennDOT Photo License Center, an eligible citizen can choose to apply to register to vote at the kiosk through a series of on-screen steps. (Appendix B). All applications to register to vote are transmitted to Department of State as an electronic file at day's end.



STEP 1 - PENNDOT DRIVER'S LICENSE OR ID CARD PROCESS

PennDOT gets an application for a Photo License or Identification card from an individual and verifies their citizenship, residency and age. PennDOT then creates a camera card with information embedded in a bar code.



STEP 3 - DEPARTMENT OF STATE PROCESS

Department of State electronically receives the applications to register to vote.

Our audit focused on Step 2 above based on a legislative request dated August 12, 2024, to ensure that individuals who interact with the Motor Voter process are eligible to register to vote based on state and federal laws. We reviewed information technology and controls within the PennDOT vendor-managed application that is used at a PennDOT Photo License Center and the inquiry screens that allow an individual to apply to register to vote while at a Photo License Center (the application to register to vote kiosk screens are illustrated in *Appendix B* of this audit

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report).¹⁸ We also reviewed the applications to register to vote that were transmitted by PennDOT's vendor-managed application to DOS during the audit period to confirm the individuals were of appropriate age and excluded non-citizens.

It is important to note that this audit **did not** examine the following processes within Step 1 and Step 3:

- The applications for a driver's license or ID card, which includes the supporting documentation for age, residency, and citizenship;
- The approval process by PennDOT employees for a driver's license or ID card;
- The camera cards the PennDOT DL&C System produces for an individual which designates the individual as a citizen or non-citizen within a bar code on the camera card; and
- The processes by which DOS and the counties register voters and update voter registrations once DOS receives the voter registration applications from PennDOT's vendor-managed application.

Appendix A of this audit report provides a detailed description of the audit objectives, scope, methodology, data reliability, and evaluation of management's internal controls related to the audit objectives.

PennDOT and OA had concerns related to the sensitive nature of the proprietary information within the Motor Voter vendor-managed application and confidential nature of the personally identifiable information within the DL&C System and data transmitted to DOS. These concerns caused significant delays for PennDOT and OA to provide information, documentation, and data needed to perform our audit. PennDOT and OA requested three different non-disclosure agreements (NDAs) before all information and data needed for this audit was provided. The following describes, in brief, the purpose of the three NDAs:

1. NDA #1 was signed on April 21, 2025, for information that is proprietary, confidential, and/or trade secret information to the PennDOT vendor for its Motor Voter application.
2. NDA #2 was signed on July 2, 2025, for the auditors to observe OA staff perform computer-assisted audit techniques as directed by the auditors for the data files that were transferred to DOS by PennDOT's vendor-managed application during the audit period. This is further described in *Finding 1* of this report.
3. NDA #3 was signed on October 17, 2025, for the auditors to observe OA extract source documents for 58 individuals' voter registration applications from the PennDOT DL&C System that may include personally identifiable information and/or other confidential

¹⁸ The application to register to vote includes applying to register to vote, or applying to change an existing voter's registration address, name, or political party.

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information. Refer to *Appendix A* of this report regarding audit procedures related to identification of the 58 voter registration applications.

In the sections that follow, we present relevant background information on the Motor Voter process, PennDOT's role in providing individuals with the opportunity to apply to register to vote, and OA's role in administering the DL&C System.

Pennsylvania Motor Voter Process

The initial Pennsylvania Motor Voter process was established in 1993 in accordance with the federal NVRA, also referred to as the "Motor Voter Law." The NVRA requires states to establish procedures that provide citizens with the opportunity to simultaneously apply to register to vote when interacting with the state's motor vehicle agency.¹⁹ PennDOT was designated as the cognizant agency for implementing and overseeing the Pennsylvania Motor Voter process.

In 1995, the Commonwealth enacted the Pennsylvania Voter Registration Act to align with NVRA requirements.²⁰ This legislation required PennDOT to provide individuals with the option to apply to register to vote when applying for a new or renewed driver's license or ID card.²¹ Initially, applications to register to vote were processed on paper; however, beginning in 2003, the process transitioned to an electronic process submission system.²²

According to Pennsylvania law, to be eligible to register to vote, an applicant must:

- Be a United States citizen for at least 1 month before the next primary, special, municipal, or general election;
- Be a resident of Pennsylvania and the election district in which the applicant wants to register and vote for at least 30 days prior to the next primary, special, municipal, or general election; and
- Be at least 18 years of age on or before the day of the next primary, special, municipal, or general election.²³

¹⁹ <https://www.justice.gov/crt/national-voter-registration-act-1993-nvra> (accessed October 1, 2025).

²⁰ See Act 25 of 1995, later continued and consolidated by Act 3 of 2002, *see also* 25 Pa.C.S. § 1323(a)(1).

²¹ 25 Pa.C.S. § 1323(b)(1).

²² https://www.pa.gov/content/dam/copapwp-pagov/en/dos/resources/voting-and-elections/reports/voter-registration/dos_voter_registration_report_2024_final.pdf (accessed October 1, 2025).

²³ <https://www.pa.gov/agencies/dmv/resources/laws-and-regulations/motor-voter-law> (accessed October 1, 2025).
See also 25 Pa.C.S. § 1301(a).

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There are four ways an individual can apply to register to vote or update their existing voter registration including: (1) online; (2) through the mail; (3) in-person at the individual's county election office; or (4) at PennDOT locations and other government agencies.²⁴

In 2015, PennDOT contracted with its current vendor to support the issuance of driver's license and ID cards, including taking the individual's photograph at a PennDOT Photo License Center. The terms and conditions of the vendor service contract expires on July 26, 2026, unless renewed. The vendor provides services through a network of more than 100 PennDOT Photo License Centers throughout the state.

PennDOT employees start the initial review and approval process for applications submitted to obtain a driver's license or ID card which includes obtaining documentation to verify the applicant's residency, age, and citizenship. Once the PennDOT employee approves the driver's license or ID card application in the PennDOT DL&C System, the system then prints the camera card for the individual. Because the application and supporting documents for a driver's license or ID card are submitted prior to the creation of the camera card and maintained in the PennDOT DL&C System, our audit scope did not cover the review of the driver's license or ID applications and corresponding supporting documentation, verifying the determination of citizenship, and the creation of the camera card. Whereas, the audit did cover the Motor Voter process to apply to register to vote while an individual is at a PennDOT Photo License Center.

Upon arriving at a PennDOT Photo License Center with a camera card, the individual interacts with a PennDOT technician who performs the following:

- Scans the camera card into the PennDOT vendor-managed application;
- Takes a photograph of the individual for the driver's license or ID card;
- Provides a kiosk for the individual to choose Organ Donorship;
- Provides the individual with the additional option on a kiosk to apply to register to vote or to update an existing voter registration as long as the individual is eligible based on information in the camera card's bar code;
- Creates the driver's license or ID card;
- Presents the individual with the driver's license or ID card and a receipt if the individual applied to register to vote or update an already existing voter registration; and
- Shreds the camera card.

In September 2023, PennDOT implemented an AVR process so that an eligible individual is automatically provided with the opportunity to apply to register to vote, unless the individual declines by opting out. Prior to September 2023, the individual had to take additional steps to opt

²⁴ <https://www.pa.gov/services/vote/register-to-vote> (accessed February 26, 2026).

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in to apply rather than the current opt-out method.²⁵ See *Appendix B* of this audit report for questions that an eligible individual is prompted to answer when opting to change an existing voter registration or apply to register to vote.

Upon completion of the photo and kiosk questions, the individual leaves the PennDOT Photo License Center with the driver's license or ID card and a receipt if the individual applied to register to vote or made a voter registration change. At the end of each day, Monday through Saturday, the PennDOT vendor electronically submits the required information for the applications to register to vote to DOS. No files are transmitted on Sundays, certain holidays, and when PennDOT Photo License Centers are closed.

OA's role in the Motor Voter process is limited to administering information technology support through its Office for Information Technology (OA-OIT) to PennDOT for the PennDOT DL&C System. Specifically, OA-OIT's primary responsibilities relevant to the Motor Voter process are to manage the day-to-day activities of the PennDOT DL&C System to ensure it remains operational. OA is also responsible for developing information technology-related policies to be followed by PennDOT, including those related to access management.

DOS was **not** included as an auditee in this performance audit, because we were not reviewing DOS' or the county offices' processes to register voters or update voter registrations. The role of DOS is to receive the applications to register to vote from PennDOT's vendor and route the records to the appropriate county election office where the applications are processed.

²⁵ The AVR process also has an online component which is not processed through the PennDOT vendor for when an individual is merely changing an address or name online. This process while changing a name or address was not the focus of this audit.

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Finding 1 – The Pennsylvania Department of Transportation improperly sent one non-U.S. citizen's application to register to vote to the Department of State.

The Pennsylvania Department of Transportation (PennDOT), in coordination with the Governor's Office of Administration (OA) which includes the Office for Information Technology, uses two primary computer systems to implement the Motor Voter process.

The first system is the PennDOT Driver's License and Control System (DL&C System) which is used to create and maintain driver's license and identification (ID) card records. PennDOT is responsible for manually verifying and recording an individual's age, residency, and citizenship status as part of the driver's license and/or ID card application process and maintaining the information in the DL&C System. Based on the information recorded in the DL&C System, PennDOT approves the application for a driver's license or ID card, and the DL&C System generates a camera card with a bar code that contains the individual's information, including whether the individual is a non-citizen.

The second system is a PennDOT vendor-managed application used at a PennDOT Photo License Center that scans the bar code on the camera card to process and print a driver's license or ID card, and, if eligible, present an individual with the option to apply to register to vote. The vendor-managed application electronically transmits voter registration application records to the Pennsylvania Department of State (DOS) at the end of each business day. Based on the legislative request noted in the *Introduction and Background* section of this report, we focused our audit on whether the vendor-managed application allowed non-citizens to apply to register to vote and the reliability of voter registration application data transmitted to DOS.

Federal and state laws, regulations, and guidance emphasize the importance of strong controls to protect the integrity of the Motor Voter process. Specifically, the National Voter Registration Act of 1993²⁶ requires states to ensure that only eligible individuals are offered voter registration opportunities through motor vehicle transactions, such as those carried out by PennDOT. In addition, the Pennsylvania Voter Registration Act²⁷ requires PennDOT to provide accurate voter registration information to DOS. Further, the Government Accountability Office's *Standards for Internal Control in the Federal Government* (GAO-14-704G, September 2014)²⁸ states that management should design and implement control activities to ensure data integrity and validity.

²⁶ National Voter Registration Act of 1993, 52 U.S.C. § 20504(a)(1).

²⁷ Pennsylvania Voter Registration Act (Act 25 of 1995 as continued/consolidated by Act 3 of 2002). *See in particular*, 25 Pa. C.S. § 1323(a)(1).

²⁸ On May 15, 2018, the Commonwealth issued Management Directive 325.12, *Standards for Internal Controls in Commonwealth Agencies*, to adopt and implement the internal control framework outlined in *Standards for Internal Control in the Federal Government (Green Book)* and ensure agencies use the components, principles, and attributes

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Based on the results of our audit procedures, we did not identify any instances of non-compliance within PennDOT's electronic Motor Voter registration process as it relates to the National Voter Registration Act of 1993,²⁹ the Pennsylvania Voter Registration Act,³⁰ the relevant portions of the Pennsylvania Election Code,³¹ and other applicable statutory provisions.

We did, however, find weaknesses that warrant improvements to internal controls over the Motor Voter process. In particular:

- PennDOT's Motor Voter interface files sent to DOS using the vendor-managed application properly excluded non-citizens as identified on the camera card generated by the DL&C System. However, during the audit period, we found one non-citizen was permitted to, and did, apply to register to vote due to a human error with the data entered in the DL&C System. The application was improperly sent to DOS.
- Weaknesses existed related to user access controls over the vendor-managed application used to support the Motor Voter process as described in detail in *Finding 2*. Specifically, PennDOT and OA were unable to demonstrate whether employees that used the vendor-managed application were assigned appropriate access for their roles and job responsibilities. PennDOT and OA also reported that periodic reviews of user access are not conducted for their employees that have access to the vendor-managed application.

Audit Procedures

To address our objectives, it was necessary for us to conduct procedures to determine whether the Motor Voter process met relevant state and federal requirements, including determining whether voter registration application information for individuals who were not eligible to register to vote (i.e., non-citizens and underage applicants) were properly excluded from files transmitted to DOS for voter registration processing. We focused our procedures on the following key areas:

- Gained an understanding of the Motor Voter process available for an individual to apply to register to vote while simultaneously obtaining a driver's license or ID card. We performed inquiries and walkthroughs with PennDOT and OA personnel and observed the transaction flow at a Photo License Center, including observing PennDOT using test

to design, implement, operate, and assess an effective internal control system. The Management Directive 325.12 was amended on October 1, 2021, and re-issued under the name, *Standards for Enterprise Risk Management in Commonwealth Agencies*.

²⁹ 52 U.S.C. § 20501 *et seq.*

³⁰ Pennsylvania Voter Registration Act (Act 25 of 1995 as continued/consolidated by Act 3 of 2002). *See in particular*, 25 Pa. C.S. § 1323(a)(1).

³¹ 25 Pa.C.S. § 1301 *et seq.*

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camera cards to demonstrate various scenarios and observing how the vendor-managed application responded when the camera card was scanned (e.g., whether the Motor Voter kiosk screens were presented and how the transaction was processed).

- Determined how information systems are used to support the Motor Voter process, including how information is managed in the DL&C System and vendor-managed application and whether adequate security measures were in place over the information systems.
- Assessed the reliability of data transmitted from PennDOT to DOS to determine completeness of the data used to support our audit procedures. We also performed audit procedures, including data analysis, to evaluate whether voter registration application data transmitted to DOS during the audit period excluded non-citizens.

Due to confidentiality and legal restrictions related to personally identifiable information, our access to system data and the ability to independently execute queries and generate reports was limited. As a result of these limitations, we had to rely upon onsite direct observations of PennDOT and OA staff conducting several of our requested procedures.

Using information provided by PennDOT and OA management, we determined there were 210,905 unique voter registration applications transmitted to DOS during the audit period.³² The age and citizenship status for the 210,905 voter registration applications was compared to the information in the DL&C System. For 58 voter registration applications that were identified as having potential exceptions regarding citizenship status, we conducted further analysis to evaluate whether the applicants were eligible to apply to register to vote and whether the voter registration applications were appropriately transmitted to DOS.³³ We traced record information transferred to DOS by the vendor-managed application to supporting documentation such as passports, birth certificates, and observations of data in the DL&C System.³⁴ Of the 58 voter registration applications requiring further review, we found one non-citizen's data was sent to DOS as described in the next section.

³² Voter registration application data transmitted to DOS by PennDOT's vendor-managed application is of undetermined reliability as described in *Appendix A*. However, the data appears to be the best data available. Although this determination may affect the precision of the numbers we present, there is sufficient evidence in total to support our finding and conclusions.

³³ Refer to *Appendix A* of this report regarding audit procedures related to identification of the 58 voter registration applications.

³⁴ Detailed audit procedures are more fully explained in *Appendix A* of this audit report.

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Vendor-Managed application functioned properly; however, one non-citizen's data was sent to Department of State due to manual data entry error.

We found that the vendor-managed application supporting the Motor Voter process properly processed and transmitted voter registration application data from PennDOT's vendor-managed application to DOS. Specifically, we noted that the information transmitted to DOS was consistent with the information entered into PennDOT's DL&C System and resulting camera card bar code.

However, we identified one instance from the audit period in which voter registration applications that were transmitted to DOS via the vendor-managed application improperly included a non-citizen. For this one exception, PennDOT officials stated that a non-citizen received the option to apply to register to vote due to a manual data entry error in the DL&C System that impacted information on the camera card. The non-citizen's voter registration application was transmitted to DOS because of a data entry error in the DL&C System, which incorrectly indicated that the individual was a citizen on their camera card and gave them the ability to apply to register to vote. Although the Photo License Center staff became aware of the error and corrected the information in the DL&C System and on the driver's license, the staff could not cancel or void the application to register to vote in the vendor-managed application, which allowed it to be transmitted to DOS.

The non-citizen's camera card was incorrect because a PennDOT employee did not input the individual's citizenship status in the DL&C System but instead left the status blank. A blank citizenship status defaults to the individual being labeled as a citizen. As a result, the camera card generated by the DL&C System did not reflect non-citizenship status, and the individual was presented with the Motor Voter kiosk screens to apply to register to vote while obtaining a driver's license (*see Appendix B* for the Motor Voter kiosk screens). Our testing of the kiosk screens indicated that if an individual indicates they are not a citizen when responding to the screen prompts, the voter registration application process is immediately halted. In this particular case, the non-citizen was able to complete the application to register to vote, and PennDOT's vendor-managed application transmitted it to DOS later that same day.

Lack of corrective action to address data entry error.

PennDOT stated that the error in citizenship status was discovered prior to the individual leaving the PennDOT Photo License Center. Upon discovery, the DL&C System was updated to indicate the individual was not a citizen, a new camera card was processed, and the PennDOT employee reissued a new driver's license. While a timely correction was made in the DL&C System and on the driver's license, PennDOT management stated that the technician did not have the ability to cancel or void the previous transaction in the vendor-managed application. As a result, the non-citizen's application to register to vote was sent to DOS. Further, PennDOT did not establish or

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implement protocols to proactively notify DOS of errors such as the one that occurred to ensure that the non-citizen's voter registration application process was immediately halted. Therefore, although corrective actions were taken at the PennDOT Photo License Center to change the individual's citizenship status, the entire responsibility was then placed on DOS to ensure that it did not process the erroneous application to register to vote.

Potential for erroneous transactions to continue.

The weaknesses described in this finding undermine the reliability of data on the camera cards and transmitted to DOS by creating conditions under which non-citizens could apply to register to vote when the citizenship status is not entered, or entered incorrectly, into the DL&C System by a PennDOT employee. While we noted the one exception during our test work, the potential exists that within the 210,905 voter registration applications identified during our audit period, other non-citizens' applications to register to vote may have been submitted to DOS.

Without corrective actions, manual errors similar to the one this audit identified may result in the transmission of ineligible voter registration applications to DOS for processing. The occurrence of the identified error indicated a control weakness in PennDOT's process to prevent erroneous applications to register to vote prior to transmission to DOS. The existence of blank fields rather than specific citizenship indicators for all individuals in the DL&C System increases the risk that non-citizens could be mistakenly processed as citizens and given the opportunity to apply to register to vote.

It is important to note that the scope of this audit did not include DOS' procedures for processing voter registration applications after receiving them from PennDOT's vendor-managed application. Therefore, we do not know whether or how the non-citizen's voter registration application identified during our testing was processed by DOS.

Recommendations for Finding 1

We recommend that the Pennsylvania Department of Transportation (PennDOT):

1. Evaluate the ability to update the DL&C System to intentionally require citizenship status be input into the DL&C System and prohibit the citizenship status from being blank.
2. Determine if a control can be added to the vendor-managed application to perform a cross-check of citizenship status and allow a voter registration application to be voided and not transmitted to DOS. If not, develop and implement procedures for PennDOT to

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proactively notify DOS when erroneous transactions occur and are transmitted to DOS so that timely actions can be taken to ensure inappropriate applications to register to vote are not processed by DOS.

3. For the exception identified in our report, PennDOT should coordinate with DOS to ensure that the non-citizen was not registered to vote.

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Finding 2 – The Pennsylvania Department of Transportation (PennDOT) and the Governor's Office of Administration (OA) failed to implement all appropriate employee user access controls over PennDOT's vendor-managed application supporting the Motor Voter process.

PennDOT's vendor is responsible for implementing most of the information technology (IT) security controls over the vendor-managed application; however, PennDOT and OA are responsible for implementing controls for its employees³⁵ to access the vendor-managed application to ensure that only authorized users are able to access the system's application and information it contains. Effective user access controls also ensure that employees only have access to the application functions necessary for the employee to perform their job responsibilities.

The PennDOT vendor-managed application is used to scan the bar code on an individual's camera card to process a photo, print a driver's license or ID card, and, if eligible, present an individual with the application to register to vote while at a PennDOT Photo License Center. The vendor-managed application electronically transmits voter registration applications to the Pennsylvania Department of State (DOS) at the end of each business day.

As part of our audit procedures, we gained an understanding of the systems used by PennDOT and conducted limited testing of IT controls over the Motor Voter process. We reviewed the 2024 System and Organization Controls (SOC) report³⁶ of PennDOT's vendor to assess whether the vendor-managed application supporting the Motor Voter process contained any significant weaknesses. We also conducted procedures over selected IT general controls supporting the vendor-managed application. This testing was critical given the importance of the vendor-managed application to the overall Motor Voter process.

Based on our review of the 2024 SOC report, no deficiencies were reported that would indicate that the vendor-managed application was not operating as intended. However, we identified the following control weaknesses related to PennDOT's and OA's management of user access to the vendor-managed application during our audit period:

- PennDOT and OA lacked evidence to demonstrate which employees had user access to the vendor-managed application; and

³⁵ Employees include individuals contracted by PennDOT and Commonwealth employees, including PennDOT and OA.

³⁶ SOC reports are intended to provide an independent assessment of a service organization's internal controls, including ensuring that controls exist to demonstrate that systems are secure, reliable, and compliant with relevant standards.

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- PennDOT and OA failed to conduct periodic monitoring of employees' user access to the vendor-managed application to ensure access was properly aligned with employees' job responsibilities.

The following sections detail the noted weaknesses that we found.

PennDOT and OA lacked evidence to demonstrate which employees had user access to the vendor-managed application.

PennDOT and OA were unable to demonstrate whether users of the vendor-managed application were assigned appropriate access for the users' roles and job responsibilities. Contrary to the requirements in the agency records retention schedules, PennDOT and OA officials employee access records are only retained for one year and, therefore, PennDOT and OA could not provide system-generated evidence to confirm which employees had what type of access to the vendor-managed application during the audit period of January 1, 2024, through June 30, 2024.

PennDOT management reported to the Department of the Auditor General in October 2024 that there were 706 employees that had user access to the vendor-managed application at that time, including 23 information technology support staff. However, management did not provide evidence of which users had access to the system's application, audit logs, or other supporting documentation to substantiate the number of users, roles, and privileges maintained in the vendor-managed application. As a result, we were unable to determine who had access, whether users were assigned appropriate access consistent with their roles and job responsibilities, or whether individuals were still employed or contracted by PennDOT or OA.

Internal control standards, cybersecurity frameworks, and best practices emphasize the importance of strong access controls to protect the confidentiality and integrity of information systems and the data they contain. The Government Accountability Office's *Standards for Internal Control in the Federal Government* notes that management should design control activities to achieve objectives and respond to risks, including implementing logical access controls to restrict access to authorized users. Management should promptly update access rights when employees change job functions or leave the entity. In addition, the Center for Internet Security's *CIS Critical Security Controls, Version 8.1* (CIS Controls) states that organizations should "define and maintain role-based access control, through determining and documenting the access rights necessary for each role within the enterprise to successfully carry out its assigned duties." CIS Controls also state that organizations should "establish and maintain an inventory of all accounts managed in the enterprise. The inventory must include both user and administrator accounts and, at a minimum, should contain the person's name, username, start/stop dates, and department."

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Further, the PennDOT Motor Voter vendor's 2024 SOC report for its IT application specifies that certain controls must be implemented by its customers, in this case PennDOT and OA, to ensure that the overall control environment is effective. The controls that are PennDOT's and OA's responsibility include user access administration procedures for adding, changing, and deleting users, in addition to assigning appropriate levels of access.

PennDOT maintained that the weaknesses identified occurred because access records are only retained for one year based on agency retention schedules. However, this explanation was not consistent with the OA *Records Retention and Disposition Schedule* which indicated that Commonwealth agencies (such as PennDOT) are to retain system user access files until the user no longer needs access to the system. PennDOT did not provide its *Records Retention and Disposition Schedule*. Further, we determined that PennDOT's implementation was not consistent with CIS Controls because it did not establish and maintain an inventory of all accounts managed, including both user and administrator accounts. While maintaining access records for a short period can be helpful, it was not effective to ensure that appropriate auditable evidence was maintained to assess controls in place for access to the vendor-managed application by PennDOT and OA employees.

PennDOT and OA failed to conduct periodic monitoring of employees' user access to the vendor-managed application to ensure access was properly aligned with job responsibilities.

PennDOT and OA reported that periodic reviews of employees' user access to the vendor-managed application are not conducted, which is a common control used to ensure that application user access rights are properly aligned with job duties. PennDOT management also confirmed that no formal policies and procedures exist to periodically review user access to ensure that the access to the application is current, authorized, and appropriate based on the employee's roles and job responsibilities. Instead, management stated that it relies on the Commonwealth of Pennsylvania (CWOPA) account management process, which automatically disables accounts after 30 days of inactivity. While this control may address accounts that are not being used, it is not a substitute for management's responsibility to periodically review whether employees' user access is appropriate based on roles and responsibilities, including who has access, why they have access, and what type of access users have.

The weaknesses identified related to periodic access reviews occurred because management had not developed and implemented policies and procedures in accordance with cybersecurity frameworks and best practices. The Commonwealth's Information Technology Policy, referred to as the *Commonwealth Data Center Privileged User Identification and Access Management Policy*, indicates that privileged accounts and access rights will be reviewed every six months

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and adjusted as needed. However, management indicated that there were no privileged accounts associated with the vendor-managed application. Although management made this assertion, it did not provide any support for the roles and responsibilities of the users that had access to the vendor-managed application, including whether some of the users had access rights that were elevated beyond those of a regular user.

While OA communicated the need to perform a periodic user access rights review for privileged accounts in accordance with the *Information Technology Policy: Commonwealth Data Center Privileged User Identification and Access Management Policy*, this control does not align with the common framework established in National Institute of Standards and Technology Special Publication 800-53, Revision 5, *Security and Privacy Controls for Information Systems and Organizations*, Section AC-6(7), which notes that the organization should review all of the accounts, not just privileged accounts, assigned to the designated roles or classes of users to validate the need for such privileges. Further, CIS Controls states that organizations should perform access control reviews of enterprise assets to validate that all privileges are authorized on a recurring schedule at a minimum, annually, or more frequently.

Inappropriate Access and Activity Could Occur Without Further Controls

We determined that the lack of evidence to demonstrate appropriate user access during the audit period, combined with the failure to conduct periodic user access monitoring, could result in inappropriate access to and activity in the vendor-managed application. For instance, the reliance on short-term retention periods and failure to establish and maintain an inventory of employees with access limits management's ability to demonstrate compliance with its user access monitoring requirements as a user entity of the vendor-managed application. It also limits the ability of PennDOT, its vendor, and OA to conduct audit activities of user access in the event of a cybersecurity breach or during an investigation related to inappropriate staff conduct or errors.

Without a formal periodic user access review process and a related policy, as well as a documented audit trail, there is no assurance that user access for the vendor-managed application is properly aligned with job duties. In addition, accounts for terminated users may not be deactivated in an effective and timely manner. For example, although management reported in October 2024 that 706 users had access to the vendor-managed application, including 23 IT support staff, it could not demonstrate through periodic reviews that these users still required access appropriate for their roles and responsibilities, or whether they were still employed or contracted by PennDOT or OA. Ultimately, the weaknesses noted in our report could result in employees making unauthorized changes to data in the vendor-managed application, thereby impacting the integrity of the Motor Voter data.

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Recommendations for Finding 2

We recommend that the Governor's Office of Administration (OA):

1. Update Records Retention and Disposition Schedules, as necessary, for a longer period of time (i.e., beyond the current one year period) to ensure that records are available for audit review and to make sure that PennDOT is provided with adequate direction for maintaining appropriate documented evidence to support that access rights and roles are commensurate with users' job responsibilities.
2. Provide additional Commonwealth policy direction to define application owner's (such as PennDOT) responsibilities for performing periodic user access reviews of privileged and non-privileged accounts in accordance with industry cybersecurity frameworks and best practices.

We recommend that the Pennsylvania Department of Transportation (PennDOT):

1. Establish formal documented procedures until OA policy is developed for conducting periodic access reviews for all users (privileged and non-privileged users) of the vendor-managed application.
2. Establish and maintain an inventory of all vendor-managed application accounts, including both user and administrator accounts. The inventory, at a minimum, should contain an individual's name, username, start/stop dates, agency, and job title.
3. Conduct periodic reviews of all accounts at least bi-annually and document results, any actions taken, and approvals to support that access rights and roles are commensurate with users' job responsibilities.

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Pennsylvania Department of Transportation's and the Governor's Office of Administration's Response and Auditor's Conclusion

We provided copies of our draft audit findings and related recommendations to the Pennsylvania Department of Transportation (PennDOT) and the Governor's Office of Administration (OA) for review. On the pages that follow, we included PennDOT's and OA's response in its entirety. Following PennDOT's and OA's response is our auditor's conclusion.

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Audit Response from the Pennsylvania Department of Transportation and the Governor's Office of Administration



COMMONWEALTH OF PENNSYLVANIA
OFFICE OF ADMINISTRATION

March 2, 2026

Scott D. King, CPA
Director
Bureau of Performance Audits
Department of the Auditor General
Room 316-A Finance Building
Harrisburg, PA 17120

Dear Mr. Scott:

On February 13, 2026, the Pennsylvania Department of Transportation (PennDOT) and the Office of Administration (OA) received draft findings and recommendations resulting from the Department of the Auditor General's (DAG) performance audit of Pennsylvania's Automatic Voter Registration (AVR) program, commonly referred to as the "Motor Voter Program." The following is PennDOT's and OA's joint response to the findings and recommendations detailed in the draft report.

PennDOT operates 103 photo license centers throughout the Commonwealth, employing more than 500 personnel in these centers who provide efficient, professional, and courteous service to the citizens of Pennsylvania. PennDOT has demonstrated a sustained commitment to fulfilling its responsibilities within the Automated Voter Registration framework by implementing and maintaining systems designed to promote data accuracy, timeliness, and operational efficiency.

The performance audit covered the period from January 1, 2024, through June 30, 2024. During this timeframe, PennDOT transmitted 210,905 unique voter registration applications to the Department of State and processed a total of 1,223,003 driver's licenses and photo identification card product issuances through its photo license centers. Audit testing identified only one instance in which a record associated with a noncitizen was transmitted—resulting in an observed error rate of 0.00047 percent. This exceptionally low error rate reflects PennDOT's effective internal controls, attention to detail, and overall administrative excellence in carrying out its statutory duties in support of both transportation and voter registration processes.

Further, the limited scope of this audit should be noted. As specified in the draft report, the Department of State and county election offices, which are responsible for registration of voters, were not included within the scope of the audit. The AVR process is simply a collection of voter information and does not register individuals to vote. As noted in the draft report, the information on the individuals who do not opt out of the automatic voter registration are sent to the Department of State and subsequently local county election offices, where, if eligibility is confirmed, the individual is ultimately registered to vote.

SECRETARY
607 South Drive, 5th Floor Forum Building | Harrisburg, PA 17120 | www.oa.pa.gov

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Scott D. King, CPA
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OA's and PennDOT's responses to the two findings and corresponding recommendations are set forth in the attached spreadsheet. In addition to our responses, PennDOT is recommending some minor corrections to the draft report regarding terminology to ensure accuracy of the final report. Throughout the draft audit report, there are references to "Driver License Centers" as the location where the voter registration application process occurs. While PennDOT has both Driver License Centers and Photo License Centers, and in many cases, both are co-located at the same facility, the voter registration application process only takes place at Photo License Centers. There are over 100 Photo License Centers, but less than 80 Driver License Centers. Further, on page two of the report, it indicates PennDOT verifies citizenship before issuing a camera card. Although a minor distinction, PennDOT verifies legal presence, not citizenship.

We look forward to participating in the exit conference with audit staff on March 3, 2026.

Sincerely,



Neil R. Weaver
Secretary of Administration
Office of Administration



Michael B. Carroll
Secretary
Pennsylvania Department of Transportation

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Finding/Recommendation in Draft Report	PennDOT and OA Response
<p>Finding 1: The Pennsylvania Department of Transportation improperly sent one non-U.S. citizen's application to register to vote to the Department of State.</p>	<p>PennDOT: As noted in the report, a manual data entry error occurred on one out of the 210,905 records reviewed resulting in the voter registration screens being shown to one non-US citizen applicant. While the data error was corrected that same day on the individual's record, the application was sent to the Department of State's system since the customer completed the application. It should be noted that applicants who complete the voter registration application are initially asked to confirm citizenship prior to being provided with all voter registration screens and the customer must declare citizenship to complete the application process. In addition, applicants are provided with voter qualification requirements on screen during the application process. If at any time a customer indicates that they are not eligible because of not meeting citizenship requirements, the voter registration application process stops and cannot be completed. PennDOT submits completed voter registration applications to the Department of State's system; however, county offices are responsible for performing voter registration.</p>
<p>Recommendation 1.1: Evaluate the ability to update the DL&C System to intentionally require citizenship status be input into the system and prohibit the citizenship status from being blank.</p>	<p>PennDOT: PennDOT is evaluating this system update and will work towards implementing the recommendation.</p>
<p>Recommendation 1.2: Determine if a control can be added to the vendor-managed application to perform a cross-check of citizenship status and allow a voter application to be voided and not transmitted to DOS. If not, develop and implement procedures for PennDOT to proactively notify DOS when erroneous transactions occur and are transmitted to DOS so that timely actions can be taken to ensure inappropriate applications to register to vote are not processed by DOS.</p>	<p>PennDOT: Within 60 days, PennDOT plans to improve communication to notify the Department of State should PennDOT or photo license staff identify a voter registration application submitted in error.</p>
<p>Recommendation 1.3: For the exception identified in our report, PennDOT should coordinate with DOS to ensure that the non-citizen was not registered to vote.</p>	<p>PennDOT: PennDOT has given notice of the exception to the Department of State.</p>

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<p>Finding 2: The Pennsylvania Department of Transportation (PennDOT) and the Governor’s Office of Administration (OA) failed to implement all appropriate employee user access controls over PennDOT’s vendor-managed application supporting the Motor Voter process.</p>	<p><u>PennDOT:</u> Disagree with finding as stated. Please see responses to recommendations below.</p> <p><u>OA:</u> Disagree with finding as stated. Please see responses to recommendations below.</p>
<p>Recommendation 2.1 (OA): Update Record Retention and Disposition Schedules, as necessary. For a longer period of time (i.e. beyond the current one year period) to ensure that records are available for audit review and to make sure that PennDOT is provided with adequate direction for maintaining appropriate documented evidence to support that access rights and roles are commensurate with users’ job responsibilities.</p>	<p><u>OA:</u> Management confirms that records are maintained in alignment with industry best practice and are retained in accordance with operational and organizational needs. OA will continue to monitor our recordkeeping processes to ensure they remain effective, compliant and supportive of business objectives. Further, retaining records longer than necessary or legally required is not best practice.</p>
<p>Recommendation 2.2 (OA): Provide additional Commonwealth policy direction to define application owner’s (such as PennDOT) responsibilities for performing periodic user access reviews of privileged and non-privileged accounts in accordance with industry cybersecurity frameworks and best practices.</p>	<p><u>OA:</u> OA will review our processes around user access to ensure they remain effective, compliant and supportive of business objectives including providing guidance to using agencies in accordance with industry cybersecurity frameworks and best practices.</p>
<p>Recommendation 2.1 (PennDOT): Establish formal documented procedures until OA policy is developed for conducting periodic access reviews for all users (privileged and non-privileged) of the vendor-managed application.</p>	<p><u>PennDOT:</u> We will review user access processes to prevent unauthorized access and ensure they remain effective, compliant and supportive of business objectives in alignment with industry cybersecurity frameworks and best practices.</p>
<p>Recommendation 2.2 (PennDOT): Establish and maintain an inventory of all vendor-managed application accounts, including both user and administrator accounts. The inventory, at a minimum, should contain an individual’s name; username, start/stop dates, agency, and job title.</p>	<p><u>PennDOT:</u> PennDOT disagrees with this recommendation as stated. A historical inventory of user accounts is not necessary. Management will review what capability exists to query all current active user accounts in order to perform reviews as needed.</p>

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<p><u>Recommendation 2.3 (PennDOT):</u> Conduct Periodic reviews of all accounts at least bi-annually and document results, any actions taken, and approvals to support that access rights and roles are commensurate with users' job responsibilities.</p>	<p><u>PennDOT:</u> We will continue to monitor our user access processes to ensure they remain effective, compliant, and supportive of business objectives in alignment with OA's policy.</p>
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Auditor's Conclusion to the Pennsylvania Department of Transportation's and the Governor's Office of Administration's Response

The Pennsylvania Department of Transportation's (PennDOT) and the Governor's Office of Administration's (OA) management provided a combined response that agreed with *Finding 1* but disagreed with *Finding 2*, as noted below with our auditor's conclusion. PennDOT also brought two technical edits to our attention for the report, one to clarify the Motor Voter process is only used in the PennDOT Photo License Centers and the other to clarify that PennDOT verifies legal presence and not citizenship. We made these edits for clarification to address these comments throughout our report, where warranted.

Finding 1

PennDOT agreed that the manual data entry error occurred, the non-citizen was presented with the voter registration kiosk screens and applied to register to vote, and the application was sent to the Department of State (DOS). PennDOT also noted that the applicant is responsible for confirming citizenship before applying to register to vote. However, PennDOT indicated that this one error resulted in an observed error rate of 0.00047 percent. This is not accurate, because we did not review supporting documentation for all 210,905 records processed during the audit period. We only reviewed supporting documentation for 58 records and identified one exception. Therefore, an error rate for the population cannot be determined and this error for one of 58 records should not be projected over the entire population of records.

As stated in the report, the weaknesses described in this finding undermine the reliability of data on the camera cards and the data transmitted to DOS. The current process which has some fundamental flaws creates conditions under which non-citizens could apply to register to vote when the citizenship status is not entered, or entered incorrectly, into the Driver License and Control System (DL&C System) by a PennDOT employee. While we noted the one exception during our test work, the potential exists that within the 210,905 voter registration applications identified during our audit period, other non-citizens' applications to register to vote may have been submitted to DOS.

Although PennDOT places the onus on DOS and the county offices for completing the voter registration, it is PennDOT's responsibility to ensure the information is accurate prior to transmission to DOS.

Recommendation 1

PennDOT agreed to evaluate the DL&C System to require a citizenship status and to prohibit a blank Immigration and Naturalization Service (INS) status indicator.

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We are pleased PennDOT agreed with our recommendation and reiterate the importance of having an INS status for all individuals, including U.S. citizens.

Recommendation 2

PennDOT agreed to improve communication with DOS if staff identify a voter registration application is transmitted in error.

We are pleased PennDOT agreed with our recommendation and intends to improve communication with DOS if voter registration applications are submitted in error.

Recommendation 3

PennDOT agreed and stated that it gave notice to DOS for the exception identified in our report.

We are pleased PennDOT agreed with our recommendation to notify DOS of the exception identified in our report; however, we also reiterate the importance of ensuring that the non-citizen was not registered to vote.

Finding 2

PennDOT and OA disagreed with the finding and provided responses to the individual recommendations as listed below.

OA Recommendation 1

OA did not specifically agree or disagree with our recommendation to update record retention and disposition requirements. Rather, OA asserted that it confirmed records are maintained in accordance with current requirements and operational and organizational needs.

We are pleased that OA confirmed that its records management practices are in accordance with current requirements and operational needs. However, we reiterate that weaknesses existed during our audit related to the availability of records supporting user access. As noted in our report, inadequate records retention can limit the ability of PennDOT, its vendor, and OA to conduct audit activities in the event of a cybersecurity incident or investigation into inappropriate employee access or errors.

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OA Recommendation 2

OA agreed to review its processes related to user access to ensure they are in accordance with industry cybersecurity frameworks and best practices.

We are pleased OA agreed with our recommendation to ensure its processes align with industry cybersecurity frameworks and best practices.

PennDOT Recommendation 1

PennDOT agreed to review user access processes to prevent unauthorized access of the vendor-managed application.

We are pleased PennDOT agreed to review user access processes to ensure they are effective in preventing unauthorized access.

PennDOT Recommendation 2

PennDOT disagreed with our recommendation to maintain an inventory of all vendor-managed application accounts and stated a historical inventory is not necessary.

We disagree. Although PennDOT commented that maintaining a historical inventory of users is not necessary, we are not recommending that PennDOT maintain a history of all users that have ever accessed the system. However, maintaining sufficient documentation to validate user access rights for the audit period and a current inventory of user accounts to support periodic reviews is a functional access control practice. Our recommendation is supported by OA's policy that user access records be maintained until the user no longer has access to the system. As noted in our report, this is further supported by the Center for Internet Security's *CIS Critical Security Controls, Version 8.1* (CIS Controls), which states that organizations should "establish and maintain an inventory of all accounts managed in the enterprise."

PennDOT Recommendation 3

PennDOT agreed to continue to monitor its user access processes in alignment with OA's policy.

We disagree. PennDOT implied that it is effectively monitoring user access to the vendor-managed application. To the contrary, as noted in our report, PennDOT reported that periodic reviews of user access to the vendor-managed application are not conducted. PennDOT also confirmed that no formal policies or procedures exist to periodically review user access to ensure

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that access to the vendor-managed application is current, authorized, and appropriate based on the employee's job roles and responsibilities.

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Appendix A

Objectives, Scope, Methodology, and Data Reliability

The Department of the Auditor General (Department) conducted this performance audit of the Pennsylvania Department of Transportation's (PennDOT) and the Governor's Office of Administration (OA) regarding the Pennsylvania Motor Voter process pursuant to Sections 402 and 403 of The Fiscal Code (Code).³⁷

We conducted this audit in accordance with generally accepted *Government Auditing Standards*. Those 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 our audit objectives.³⁸ We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Objectives

Our performance audit objectives were as follows:

1. Assess PennDOT's electronic Motor Voter registration process, including the implementation of the state Automatic Voter Registration (AVR) which began on September 19, 2023, for compliance with the National Voter Registration Act of 1993 (NVRA), the corresponding Motor Voter provision in the state Election Code, any other statutory provision that applies, and any applicable PennDOT guidelines, policies, and procedures.
2. Determine whether PennDOT's Motor Voter interface files sent to the Pennsylvania Department of State (DOS) properly excluded non-citizens.

Scope

This performance audit covered the period January 1, 2024, through June 30, 2024.

³⁷ 72 P.S. §§ 402 and 403 and *Dep't of the Aud. Gen. v. State Emp. Ret. Sys.*, 860 A.2d 206, 214 (Pa. Cmwlth., 2004) amending the prior decision in *Dep't of the Aud. Gen. v. State Emp. Ret. Sys.*, 836 A.2d 1053, 1069-1070 (Pa. Cmwlth. 2003) which determined that the Auditor General has the authority to conduct performance audits pursuant to **both** Sections 402 and 403 of the Code, and Pa. Const. art. VIII, Sec. 10.

³⁸ U.S. Government Accountability Office. *Government Auditing Standards*. 2018 Revision Technical Update April 2021.

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PennDOT and OA (which includes the Office for Information Technology) management are responsible for establishing and maintaining effective internal controls to provide reasonable assurance of compliance with applicable laws, regulations, and administrative policies and procedures. In conducting our audit, we obtained an understanding of PennDOT’s and OA’s internal controls, including information system controls.

Standards for Internal Control in the Federal Government (also known as and hereafter referred to as the Green Book), issued by the Comptroller General of the United States, provides a framework for management to establish and maintain an effective internal control system.³⁹ We used the framework included in the Green Book when assessing the PennDOT and OA internal control systems.

The Green Book’s standards are organized into five components of internal control. In an effective system of internal control, these five components work together in an integrated manner to help an entity achieve its objectives. The five components contain 17 related principles, listed in the table below, which are the requirements an entity should follow in establishing an effective system of internal control.

We determined that all internal control components were significant to both audit objectives. The table below represents a summary of the level of our internal control assessment for effectiveness of design (D); implementation (I); or operating effectiveness (OE), that we performed for each principle with respect to both PennDOT and OA, along with a conclusion regarding whether issues were found with the principles, and if those issues are included in a finding.⁴⁰

Component	Principle	PennDOT (Objectives 1 and 2)		OA (Objective 1)	
		Level of Assessment	Conclusion	Level of Assessment	Conclusion
Control Environment	1 The oversight body and management should demonstrate a commitment to integrity and ethical values.	D	No Issues	D	No Issues

³⁹ Even though the Green Book was written for the federal government, it explicitly states that it may also be adopted by state, local, and quasi-government entities, as well as not-for-profit organizations, as a framework for establishing and maintaining an effective internal control system.

⁴⁰ The Green Book, Sections OV3.05 and 3.06, states the following regarding the level of assessment of internal controls. Evaluating the design of internal control includes determining if controls individual and in combination with other controls are capable of achieving an objective and addressing related risks. Evaluating implementation includes determining if the control exists and if the entity has placed the control into operation. Evaluating operating effectiveness includes determining if controls were applied at relevant times during the audit period, the consistency with which they were applied, and by whom or by what means they were applied.

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		PennDOT (Objectives 1 and 2)		OA (Objective 1)	
Component	Principle	Level of Assessment	Conclusion	Level of Assessment	Conclusion
	2 The oversight body should oversee the entity’s internal control system.	D	No Issues	D	No Issues
	3 Management should establish an organizational structure, assign responsibility, and delegate authority to achieve the entity’s objectives.	D	No Issues	D	No Issues
	4 Management should demonstrate a commitment to recruit, develop, and retain competent individuals.	D	No Issues	D	No Issues
	5 Management should evaluate performance and hold individuals accountable for their internal control responsibilities.	D	No Issues	D	No Issues
Risk Assessment	6 Management should define objectives clearly to enable the identification of risks and define risk tolerances.	D	No Issues	D	No Issues
	7 Management should identify, analyze, and respond to risks related to achieving the defined objectives.	D	No Issues	D	No Issues
	8 Management should consider the potential for fraud when identifying, analyzing, and responding to risks.	D, I, OE	FINDING 1, 2	D, I	FINDING 2
	9 Management should identify, analyze, and respond to significant changes that could impact the internal control system.	D	No Issues	D	No Issues

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		PennDOT (Objectives 1 and 2)			OA (Objective 1)	
Component	Principle	Level of Assessment	Conclusion	Level of Assessment	Conclusion	
Control Activities	10	Management should design control activities to achieve objectives and respond to risks.	D, I, OE	FINDINGS 1, 2	D, I	FINDING 2
	11	Management should design the entity’s information system and related control activities to achieve objectives and respond to risks.	D, I, OE	FINDINGS 1, 2	D, I	FINDING 2
	12	Management should implement control activities through policies.	D, I, OE	FINDINGS 1, 2	D, I, OE	FINDING 2
Information and Communication	13	Management should use quality information to achieve the entity’s objectives.	D	No Issues	D	No Issues
	14	Management should internally communicate the necessary quality information to achieve the entity’s objectives.	D	No Issues	D	No Issues
	15	Management should externally communicate the necessary quality information to achieve the entity’s objectives.	D	No Issues	D	No Issues
Monitoring	16	Management should establish and operate monitoring activities to monitor the internal control system and evaluate results.	D, I, OE	FINDINGS 1, 2	D, I, OE	FINDING 2
	17	Management should remediate identified internal control deficiencies on a timely basis.	D, I, OE	FINDING 1	D	No Issues

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Government Auditing Standards require that we consider information system controls "...to obtain sufficient, appropriate evidence to support the audit findings and conclusions."⁴¹ This process further involves determining whether the data that supports the audit objectives is reliable. In addition, Publication GAO-20-283G, *Assessing Data Reliability*, provides guidance for evaluating data using various tests of sufficiency and appropriateness when the data are integral to the audit objectives.⁴² See our assessment in the *Data Reliability* section that follows.

Our procedures to assess the design, implementation, and/or operating effectiveness are discussed in the *Methodology* section that follows. Deficiencies in internal controls we identified during our audit and determined to be significant within the context of our audit objectives are summarized in the *Conclusion* section below and described in detail within the respective audit findings in this audit report. See the table above for descriptions of each of the principle numbers included in the conclusions below.

Conclusion for PennDOT (Objectives 1 and 2):

Our assessment of PennDOT management's Motor Voter process internal controls did not find any issues associated with Principles 1 through 7, 9, and 13 through 15. However, we identified issues with management's internal controls regarding Principles 8, 10 through 12, 16, and 17. These areas include issues with PennDOT's lack of monitoring user access controls, maintaining user access records beyond one year, and limitations in PennDOT's control activities to prevent or detect ineligible records prior to transmission to DOS, as well as limitations in the process to retract records after transmission. These issues are described in detail in *Finding 1* and *Finding 2* of this report.

Conclusion for OA (Objective 1):

Our assessment of OA management's internal controls did not find issues associated with Principles 1 through 7, 9, 13 through 15, and 17. However, we identified issues with management's internal controls regarding Principles 8, 10 through 12, and 16. These areas include issues with OA's lack of policy and monitoring of PennDOT's user access controls to the Motor Voter vendor-managed application. Additionally, OA does not ensure PennDOT is monitoring user access control. These issues are described in detail in *Finding 2* of the report.

⁴¹ U.S. Government Accountability Office. *Government Auditing Standards*. 2018 Revision. Technical Update April 2021. Paragraph 8.59 through 8.67.

⁴² U.S. Government Accountability Office. *Assessing Data Reliability*. December 2019.

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Methodology

The following planning procedures were performed to address both of our audit objectives:

- Identified PennDOT and OA individuals that are charged with governance and communicated an overview of the objectives, scope, methodology, and timing of the performance audit.
- Obtained an understanding of PennDOT's organizational structure through information published on relevant websites, Enterprise Risk Management Reports for fiscal year 2024/2025, responses to our fraud questionnaires, responses to *Information Systems Controls Assessment* and *Understanding of Information Technology Environment* forms, and interviews with PennDOT management. [PennDOT – All Principles]
- Obtained an understanding of OA's organizational structure through information published on relevant websites, Enterprise Risk Management Reports for fiscal year 2024/2025, responses to our fraud questionnaires, responses to *Information Systems Controls Assessment* and *Understanding of Information Technology Environment* forms, and interviews with OA management. [OA – All Principles]
- Reviewed the following federal laws and regulations applicable to the Motor Voter process:
 - The Voting Rights Act of 1965 – Provides for United States citizens' voting rights and the states with the authority to oversee the registration and qualifications to vote.⁴³
 - National Voter Registration Act of 1993 (NVRA) – Provides states with authority to provide applications to register to vote simultaneously when applying for a driver's license.⁴⁴
 - Driver's Privacy Protection Act of 1994 – Provides state agencies with the authority to use personal information for official functions of the state agency but not for purposes such as contacting individuals.⁴⁵
 - Help America Vote Act of 2002 – Allows states to validate minimum election requirements such as verifying information using access to the social security system.⁴⁶

⁴³ 52 USC § 10502(d).

⁴⁴ 52 USCA § 20503(a)(1).

⁴⁵ 18 USCA §§ 2721(b)(1) and (b)(5).

⁴⁶ Title III, Sec. 303(5)(B)(i)&(ii).

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- Reviewed the following state laws and regulations applicable to the Motor Voter process:
 - The Pennsylvania Voter Registration Act 1995-25 and applicable pieces of Title 75 **Vehicles**, Chapter 15:
 - § 1510(a) provides specifications for information that is on the driver's license;
 - § 1515(a) provides a process for change of name or address; and
 - § 6114 Limitation on sale, publication and disclosure of records.
 - Pennsylvania Consolidated Statutes Title 25 **Elections** (governs voter registration):
 - § 1102 Definitions;
 - § 1321 provides for various methods to vote;
 - § 1323 (a)(1) provides the simultaneous application process for driver's license and voting registration; and
 - § 1323 (a)(3) provides for a change or address to a driver's license as notification for a change of address to an existing voter registration.
 - Breach of Personal Information Notification Act, 73 P.S. §§ 2301-2330 – Provides notification requirements if personal information has been breached.
- Reviewed PennDOT's Motor Voter Law website⁴⁷ to gain an understanding of the requirements to be eligible to register to vote in Pennsylvania.
- Designed audit procedures to provide reasonable assurance of detecting significant violations of law, regulations, policies, etc., in the context of our audit objectives.
- Obtained an understanding of how the Motor Voter process is implemented by holding discussions with relevant officials and reviewing documentation. We obtained an understanding of PennDOT's and OA's internal controls and assessed the design, implementation, and/or operating effectiveness of such internal controls to the extent necessary to address the audit objectives. We evaluated the significance of identified internal control deficiencies within the context of our audit objectives. [PennDOT and OA – All Principles]
- Reviewed policies and procedures for the Photo License Center employees/technicians related to the PennDOT Motor Voter process. [PennDOT – Principle 12]

⁴⁷ <https://www.pa.gov/agencies/dmv/resources/laws-and-regulations/motor-voter-law> (accessed October 1, 2025).

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- Designed the audit procedures and test work based on risk assessments to obtain sufficient, appropriate evidence that provided a reasonable basis for findings and conclusions based on the audit objectives and to reduce audit risk to an acceptably low level.

The following procedures were performed to address Objective 1:

- Interviewed and corresponded with PennDOT and OA management to gain an understanding of the Motor Voter process internal control procedures, monitoring activities, and key reports that are significant to the audit objectives. [PennDOT and OA – All Principles]
- Documented the activities used in the Motor Voter process through interviews, walk-throughs of the process at a Photo License Center, and observations of the Motor Voter kiosk screens that allow a citizen to apply to register to vote (*see also Appendix B*).
- Conducted assessments of relevant information technology general and application controls for information systems pertinent to compliance with the Motor Voter process by performing the following:
 - Reviewed the contract between PennDOT and its vendor that supports the Motor Voter process.
 - Reviewed the System and Organization Controls (SOC) reports for 2023 and 2024 for the Motor Voter vendor-managed application. [PennDOT and OA – Principle 11]
 - Reviewed Motor Voter vendor-managed application and functional specifications documentation.
 - Tested the design and implementation of Complimentary User Entity Controls at PennDOT and OA included in the vendor's 2023 and 2024 SOC reports. [PennDOT and OA – Principles 8, 10 through 12, 16 and 17]
- Reviewed various internal control standards, cybersecurity frameworks, and best practices for user access controls to protect the confidentiality and integrity of information systems and the data they contain. [PennDOT and OA – Principles 8, 10 through 12, 16 and 17]

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- Reviewed Commonwealth Data Center Privileged User Identification and Access Management Policy and applicable Records Retention and Disposition Schedules. [PennDOT and OA – Principles 8, 10 through 13, 16 and 17]
- Observed a demonstration using test camera cards to determine whether non-citizens and citizens under the legal voting age are prompted to complete voter registration in the Motor Voter vendor-managed application. [PennDOT – Principles 10 and 11]

The following procedures were performed to address Objective 2:

- Requested data files the vendor-managed application transmitted to DOS for applications to register to vote for the period January 1, 2024, through June 30, 2024.
- Observed how individuals' data, including citizenship and age, is maintained in PennDOT's Driver's License and Control System (DL&C System).
- Observed OA and PennDOT staff generate a consolidated output file of voter registration application data for the period January 1, 2024, through June 30, 2024, by joining the interface transaction files sent to DOS (e.g., voter registration applications) to corresponding DL&C System records using a data integration process. This procedure was necessary because the interface files sent to DOS did not contain citizenship status fields needed for our audit analysis. [PennDOT – Principles 8, 10 through 12, 16 and 17]
- Performed computer-assisted audit techniques on the consolidated file to verify age and citizenship to identify records that required further review. (*See* detailed procedures in the *Data Reliability* section below.) [PennDOT – Principles 8, 10 through 12, 16 and 17]
- Inspected supporting documentation and reviewed data in the DL&C System to confirm age and citizenship status. [PennDOT – Principles 8, 10 through 12, 16 and 17] (*See* detailed procedures in the *Data Reliability* section below.)

Data Reliability

Government Auditing Standards requires us to assess the sufficiency and appropriateness of computer-processed information that we used to support our findings, conclusions, and recommendations. The assessment of the sufficiency and appropriateness of computer-processed

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information includes considerations regarding the completeness and accuracy of the data for the intended purposes.⁴⁸

In addition to the procedures described in the remainder of this section, as part of our overall processing in obtaining assurance of the reliability of computer-processed information and data files, we obtained a management representation letter from PennDOT and OA. This letter, signed by PennDOT and OA management, included a confirmation statement indicating the data provided to us had not been altered and was a complete and accurate duplication of the information from its original source.

Our audit procedures for Objectives 1 and 2 included inquiry with PennDOT and OA officials, Motor Voter process walkthroughs, observations of information system processes and data, and reviews of relevant procedures and other documentation. For Objective 1, we used computer-processed information or data extracts to support our findings or conclusions; however, that information was not the sole basis for our findings and conclusions.

For Objective 2 audit procedures, PennDOT requested the Motor Voter interface files from DOS that DOS received from PennDOT's vendor-managed application during the audit period of January 1, 2024, through June 30, 2024. To confirm the reliability of the data, we performed the following:

- Reviewed available system specification documentation relevant to the vendor-managed application supporting the Motor Voter process, including system diagrams to demonstrate the collection and flow of data.
- Documented our understanding of the information technology environment supporting the DL&C System and the vendor-managed application that are part of the Motor Voter process. [PennDOT and OA – Principle 11]
- The following procedures were completed during onsite meetings with PennDOT and OA officials. We were limited in the information that we could retain due to management's concerns related to restricting access to personally identifiable information:
 - Confirmed that 156 data interface files for applications to register to vote were sent to DOS during the audit period. These files were obtained by OA from DOS in support of our audit procedures and were not provided directly to us. We reviewed available documentation and observed with OA personnel how the

⁴⁸ U.S. Government Accountability Office. Government Auditing Standards. 2018 Revisions. Technical Update April 2021. Paragraph 8.98.

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interface files were received from DOS to help satisfy our audit procedures over completeness of the data. We noted 3 of the 156 files had no records due to transfers made on holidays when the Photo License Centers were closed.

- Performed internal completeness and reasonableness checks on the files provided, including reviewing record counts reflected in the files received and checking for anomalies such as unexpected duplicates and date-range coverage. Neither PennDOT management nor PennDOT's vendor were able to provide independent system-generated documentation, such as transmission logs, to verify the number of records reported by the vendor for records transferred to DOS during the audit period.
- Observed OA officials use data matching software to match records in the DL&C System to those sent to DOS through the vendor-managed application. This included reviewing the query process used by OA to correlate the interface files the vendor-managed application sent to DOS to the information in the DL&C System. The records were matched using the unique driver's license numbers. Because the files sent to DOS do not include citizenship status, this matching process was used to identify whether any voter registration applications were for non-citizens based on the Immigration and Naturalization Service (INS) indicator recorded in the DL&C System.
- Based on the previous information, we determined that there were 211,928 total records sent to DOS during the period of January 1, 2024, through June 30, 2024. After accounting for multiple records that were related to the same individual, we determined that a total of 210,905 individuals applied to register to vote through the Motor Voter process during the audit period.
- For each of the records in the audit period, we evaluated age eligibility by comparing the date of birth in the records transmitted to DOS to the applicable election date criteria. No exceptions were noted related to our testing against age eligibility criteria.
- For each of the records transmitted to DOS during the audit period, the driver's license number in the interface files sent to DOS was used to identify the individual in the DL&C System to retract the INS indicator to ensure all applications were listed as citizens. A status indicator of "P" is used for a permanent resident non-citizen, "T" for temporary resident non-citizen, "N" for naturalized citizen, or "null" for a U.S. citizen. The comparison yielded the following INS indicators:

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- 5 Ps for permanent-resident non-citizens,
 - 3,866 Ns for naturalized citizens,
 - 53 records with no INS indicator, and
 - 208,004 records indicating “null” for citizenship.
- For the 5 records indicating a P and the 53 records indicating a blank INS indicator, we conducted further analysis to evaluate whether the applicants were eligible to apply to register to vote based on citizenship status. We traced record information for the 58 individuals' voter registration applications to supporting documentation such as passports, birth certificates, and other data in the DL&C System. We reviewed passports and/or birth certificates to verify 54 individuals were citizens and one individual was a non-citizen. The remaining 3 citizens we observed individuals' information within the DL&C System that assisted in confirming citizenship because passports and/or birth certificates were not available for review.

We determined that the data contained in the DL&C System was sufficiently reliable to support our audit objectives. Although one exception was identified during our test work, our review of citizenship and age documentation included in the DL&C System did not identify errors that could lead to an incorrect or unintended message.

We determined that the data transferred by the vendor-managed application was of undetermined reliability to support our audit objectives. Due to concerns related to the sensitive nature of information supporting our audit, PennDOT management restricted our ability to review certain information, including an inability to obtain and review the 153 interface files transmitted from the vendor-managed application to DOS. We were also unable to reconcile file/record counts to an independent, system-generated log/control total or to source data due to a lack of documentation available from PennDOT management or its vendor. Despite these impairments, the data obtained from DOS representing the applications to register to vote that were transferred by the vendor-managed application was the best data available. Although this determination may affect the precision of the numbers presented in *Finding 1*, there is sufficient evidence to support our findings and conclusions.

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Appendix B

PennDOT's Motor Voter Kiosk Screen Prompts When Applying to Register to Vote

The Department of the Auditor General conducted this performance audit to assess the Pennsylvania Department of Transportation (PennDOT) Motor Voter process that allows an individual to simultaneously apply to register to vote while at a PennDOT Photo License Center to obtain a picture and a driver's license or identification card.

Based on information stored on the camera card's bar code, the Motor Voter screens below are presented after organ donor screens only if the individual is eligible to apply to register to vote. If an individual is not eligible to apply to register to vote, the individual is only presented with the organ donor questions during this step of the Motor Voter process. The below version of the Motor Voter screens are queries for the individual to answer after the organ donor inquiry on a kiosk and were provided by PennDOT as the screens that were in place during our audit period January 1, 2024, through June 30, 2024. Usage of these publicly viewed screens in this appendix has been reviewed by PennDOT prior to inclusion in the final audit report.

1. Language selection.

Please select your language.	
01 (Press 01 for English)	17 (日本語の場合は 17 を押してください)
02 (Oprima 02 para Español)	18 (한국어인 경우 18 번을 누르십시오)
03 (中文(繁體) 請按03)	19 (19 mà niŋ mandinka kaŋo lemu)
04 (中文(简体) 请按04)	20 (नेपालीको लागि 20 थिच्नुहोस्)
05 (Shtypni 05 për Shqip)	21 (د پښتو لپاره 21 کېکړئ)
06 (ለአማርኛ 06 ን ይጫኑ)	22 (Wciśnij 22 jeśli polski)
07 (اضغط 07 للعربية)	23 (Prima 23 para português)
08 (Pritisnite 08 za Bosanski)	24 (ਪੰਜਾਬੀ ਲਈ 24 ਦਬਾਓ)
09 (myanmarbarsaraawat 09 ko nhaiutpar)	25 (нажмите 25 для русского)
10 (ចុចលើ 10 សម្រាប់ភាសាខ្មែរ)	26 (Riix 26 ee Af-soomaaliga)
11 (برای ذری 11 را فشار دهید)	27 (Bonyeza 27 kuwasiliana kwa Kiswahili)
12 (برای فارسی 12 را فشار دهید)	28 (Türkçe için 28'e basınız)
13 (Appuyez sur 13 pour le français)	29 (Натисніть 29 для української)
14 (Πατήστε 14 για ελληνικά)	30 (اردو کے لیے 30 دبائیں)
15 (हिन्दी के लिए 15 दबाएँ)	31 (Ấn 31 cho Tiếng Việt)
16 (Prema 16 per Italiano)	

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2. The individual must confirm U.S. Citizenship.

US Citizenship
Voting is for United States citizens only.

Are you a citizen of the United States?

For YES, press 1

For NO, press 2

3. Voter Registration Option – to apply to register to vote or to update a current voter registration, the individual continues the process by pressing ENTER. If the individual wants to decline to apply to register to vote or to update an existing registration, the individual opts-out by pressing 9.

Option for Voter Registration Services

As a part of your visit to PennDOT today, you will be registered to vote unless you decline to register. If you are already registered, you may update the information in your existing voter record.

To Vote:

- You must have been a United States citizen for at least one month on the day of the next election.
- You must be at least 18 years old on the day of the next election.
- You must have lived in Pennsylvania for at least 30 days before the next election.

To continue to register to vote, press **ENTER**

If you are not qualified to vote, or you do not want to register to vote or update your existing registration today, press **9**

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4. County Verification.

County of Residence Verification

Please verify that your county of residence is correct.

County:

If this information is correct, press ENTER .	If this is incorrect, or if you have a PO Box, please press 9 to continue to the County Selection Screen.
--	--

Your county voter registration office will contact you if your address isn't complete.

5. Political Party Affiliation.

Political Party Affiliation

Select your political party affiliation:

If you want to vote for a candidate in a primary election, you must register as a member of either the Democratic or Republican party.

- 1 Democratic Party
- 2 Republican Party
- 3 Green Party
- 4 Libertarian Party
- 5 No Affiliation
- 6 Other - be sure to read important information on the printed receipt once you complete this transaction.

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6. Telephone Number (Optional).

Telephone Number (Optional)

Enter your telephone number, including the area code.

Your phone number may be used to provide you with important information regarding elections, public safety, or other matters of public interest and may not be used for commercial or other purposes, except purposes related to elections and political activities.

__****

To provide a telephone number: Use the keypad to enter your area code and phone number, then press **ENTER**

If you do not wish to provide this information, please press **ENTER** to continue.

7. Mobile Telephone Number Declaration. If the individual entered a telephone number on the prior screen, the individual answers whether the number is a mobile telephone number.

Mobile Telephone Number Declaration

Is the telephone number you entered a mobile number?

For YES, press **1**

For NO, press **2**

Providing your mobile number will allow your county voter registration office and the Commonwealth to text important voter information. You will have the opportunity to opt out of text messages.

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8. Race/Ethnicity Declaration (Optional).

Race/Ethnicity(Optional)

Enter the number that corresponds to your race/ethnicity.

Providing this information is optional and will not affect your voter registration.

- 1 Native American or Alaskan Native
- 2 Native Hawaiian or other Pacific Islander
- 3 Black or African American
- 4 Hispanic or Latino
- 5 Asian
- 6 White
- 7 Two or more races
- 8 Other

If you do not wish to provide this information, please press **ENTER** to continue.

9. Application Review. The individual reviews the information on the voter registration application to verify the accuracy of the information provided. The individual may edit, continue, or cancel the voter registration application by entering the proper response.

Voter Registration Application Review

Review your registration information below.

Name: *****
Address: *****
***** , PA *****

County: *****
Party Affiliation: *****
Telephone Number: *****
Race/Ethnicity: *****

If this information is correct and you wish to register to vote or update your voter registration, press **1**.

To correct your county of residence, press **2**.

To correct your political party, press **3**.

To correct your telephone number, press **4**.

To correct your race/ethnicity, press **5**.

If you wish to cancel this application, press **6**.

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10. Voter Registration Declaration. The individual must sign the Voter Registration Declaration, verifying that he/she is legally eligible to vote by pressing 1 or must press 2 to cancel the voter registration application.

Voter Registration Declaration

I declare that:

- . I am a United States citizen and will have been a citizen for at least one month on the day of the next election.
- . I will be at least 18 years old on the day of the next election.
- . I will have resided in Pennsylvania and in my election district for at least 30 days before the next election.
- . I am legally qualified to vote.

I affirm that this information is true.

I understand that this declaration is the same as an affidavit, and, if this information is not true, I can be convicted of perjury, and fined up to \$15,000, jailed for up to 7 years, or both.

By selecting option 1 below, you are signing an application for voter registration and confirming the following:

- . You agree you have read and accept the terms of the declaration above.
- . You understand that your signature as it appears on your driver's license or identification card will be attached to your voter registration application and sent to your county voter registration office.
- . You agree to conduct this voter registration transaction by electronic means and that all laws of the Commonwealth of Pennsylvania will apply to this transaction.

To **sign** and **electronically submit** this application, press **1**.
If you **do not** agree and wish to **cancel** this application, press **2**.

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11. Voter Registration Confirmation. The individual receives a Voter Registration Confirmation screen, which should be read before pressing ENTER to complete the application to register to vote and to receive a paper receipt that the individual keeps until receiving the registration card in the mail.

Commonwealth of PA
PennDOT
Voter Registration Application Receipt
Station: *****
Today's Date: *****

***** PA *****
County: *****
DOB: *****
Party: ***** (Please see below for important information about your party affiliation)
Telephone Number: *****

Thank you for submitting your voter registration application. Please note that:
Your county voter registration office will review your application.
If you register to vote, the office at which you register will remain confidential and will be used for voter registration purposes only.
If you do not receive a voter registration card confirming your voter registration within two weeks, please contact your county voter registration office. If you registered after the deadline for the next election, your application will be reviewed and approved after the date of the election.
If you chose "Other" as your party affiliation, you may update your party affiliation choice online at www.vote.pa.gov/register and enter the name of the party of your choice through the online voter registration system. You may also contact your county voter registration office to advise them of your party affiliation choice to be sure that your political affiliation appears on your voter registration.
Please keep the paper receipt until you receive your voter registration card in the mail.
Press **ENTER** when done reading this screen.

A Performance Audit

Pennsylvania Department of Transportation Governor's Office of Administration Pennsylvania Motor Voter Process

Appendix C

Distribution List

This audit report was distributed to the following individuals:

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Pennsylvania Department of Transportation

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Governor's Office of General Counsel
Pennsylvania Department of Transportation
Office of Chief Counsel

Ms. Carolyn McCarthy
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Pennsylvania Office of Administration
Office for Information Technology

The Honorable Scott Martin
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The Honorable Vincent Hughes
Senate Minority Appropriations Chairman
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The Honorable Jordan Harris
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The Honorable Joe Pittman
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Pennsylvania Senate

The Honorable Jay Costa
Senate Minority Leader
Pennsylvania Senate

The Honorable Ed Neilson
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Pennsylvania House of Representatives

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Pennsylvania Department of Transportation Governor's Office of Administration Pennsylvania Motor Voter Process

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