THE STATE
of ALASKA
GOVERNOR BILL WALKER

Department of Administration

DIVISION OF MOTOR VEHICLES

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Anchorage, AK 99503
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May 22, 2018

Edward Hasbrouck
1736 Franklin St., 9th Floor
Oakland, CA 94612

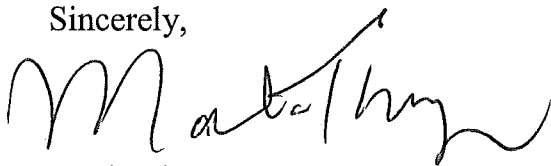Re: Public Records Request Related to S2S and SPEXS

Dear Mr. Hasbrouck:

Thank you for your letter received April 30, 2018 requesting a copy of certain public records related to S2S and SPEXS. The records are attached. DMV made the following redactions:

Document	Subject of Redactions	Reasons for Redactions
4/27/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests. *See, e.g., Alaska Wildlife Alliance v. Rue*, 948 P.2d 976, 981 (Alaska 1997); *City of Kenai v. Kenai Peninsula Newspapers, Inc.*, 642 P.2d 1316, 1323 (Alaska 1982).
5/12/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
6/1/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
7/20/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
8/31/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
9/28/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
11/9/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests

12/13/17 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
1/25/18 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
2/22/18 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
3/22/18 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
4/20/18 S2S Meeting	Meeting dial-in and log-in information	Balance of interests
8/31/18 S2S Meeting	Meeting dial-in and log-in information	Balance of interests

To the extent DMV has redacted protected information, DMV denies your request under 2 AAC 96.335(a)(4) (providing that an agency may deny a request if "nondisclosure of the record is authorized by a federal law or regulation or by state law"). *See* AS 40.25.120(a)(4) (exempting "records required to be kept confidential by a federal law or regulation or by state law"); *see also, e.g., Fuller v. City of Homer*, 75 P.3d 1059, 1063 (Alaska 2003) (citing that "Alaska's statutory definition of 'state law' encompasses common law as well as positive law") (quoting *Gwich'in Steering Comm. v. State, Office of the Governor*, 10 P.3d 572, 578 (Alaska 2000)); *Capital Information Group v. State, Office of the Governor*, 923 P.2d 29 (Alaska 1996). You may administratively appeal this denial by complying with 2 AAC 96.340. An administrative appeal requires no appeal bond. Also, you may pursue immediate judicial review by seeking an injunction from the superior court under AS 40.25.125. Not seeking an injunction will not adversely affect your rights before DMV, including in administratively appealing. Enclosed are 2 AAC 96.335 – 2 AAC 96.350.

Sincerely,

Marla Thompson
Director
Division of Motor Vehicles

2 AAC 96.335. Denial of request

(a) A request for a public record that complies with this chapter may be denied only if

(1) the record is not known to exist after the public agency makes a diligent search for it;

(2) the record is not in the public agency's possession, and after a diligent search the public agency does not know where the record is to be found;

(3) the record has been destroyed in accordance with an applicable record-retention schedule;

(4) nondisclosure of the record is authorized by a federal law or regulation, or by state law; or

(5) the record is believed to be in the agency's possession but has not yet been located, in which case the public agency shall proceed under (f) of this section.

(b) A request may be denied by the public agency head or by an agency employee to whom denial authority has been delegated by the public agency head.

(c) An initial denial of a written request must be in writing; must state the reasons for the denial, including any specific legal grounds for the denial; and must be dated and signed by the person issuing the denial. If a request is denied by a public agency employee to whom denial authority has been delegated, the notice of denial must reflect this delegation. A copy of 2 AAC 96.335 - 2 AAC 96.350 must be enclosed with the denial.

(d) A denial of a written request, in whole or in part, must state that

(1) the requestor may administratively appeal the denial by complying with the procedures in 2 AAC 96.340;

(2) the requestor may obtain immediate judicial review of the denial by seeking an injunction from the superior court under AS 40.25.125 ;

(3) an election not to pursue injunctive remedies in superior court shall have no adverse effects on the rights of the requestor before the public agency; and

(4) an administrative appeal from a denial of a request for public records requires no appeal bond.

(e) A denial of a written request is considered to be issued at the time the denial is either delivered to the United States Postal Service for mailing, or hand-delivered to the requestor by an employee or agent of the public agency.

(f) If a written request is denied because a record has not yet been located and the record is believed to exist in the agency's possession, the office in the public agency responsible for maintaining the record is believed to exist in the agency's possession, the office in the public agency responsible for maintaining the record shall continue to search until the record is located or until it appears that the

record does not exist or is not in the public agency's possession. The public agency shall periodically inform the requestor of its progress in searching for the requested record.

(g) A record that is the subject of a public records request that has been denied shall not be destroyed or transferred from the public agency's custody, except that records may be transferred to state archives and records management services as provided by AS 40.21 and regulations adopted under AS 40.21. A public agency may not destroy or transfer custody of a record to which access has been denied or restricted until at least 60 working days after the requestor is notified in writing that the request has been denied, or if there is an administrative or judicial appeal or other legal action pending at the end of the 60-working-day period, until the requestor has exhausted those actions.

2 AAC 96.340. Appeal from denial; manner of making

(a) A requestor whose written request for a public record has been denied, in whole or in part, may ask for reconsideration of the denial by submitting a written appeal to the agency head.

(b) An appeal under (a) of this section must be mailed or hand-delivered to the agency head within 60 working days after the denial is issued and must include the date of the denial and the name and address of the person issuing the denial. The appeal must also identify the records to which access was denied and which are the subject of the appeal. If an appeal is from the failure of the agency to respond to the records request within the appropriate time limit under 2 AAC 96.325, the appeal must so state, must identify the records sought, and must identify the public agency to which the request was directed and the date of the request.

(c) The 60 working days within which an appeal must be filed begins to run upon the issuance of the denial or, if no denial is issued, upon the expiration of the time period within which the public agency should have responded.

2 AAC 96.345. Appeal determinations; time allowed; by whom made

(a) As soon as practicable, but not later than the 10th working day after the close of the record on appeal, the agency head shall issue a written determination stating which of the records that are the subject of the appeal will be disclosed and which records will not be disclosed. The written determination must comply with 2 AAC 96.350.

(b) The agency head may extend the 10-working-day period for a period not to exceed 30 working days upon written request from the requestor, or by sending a written notice to the requestor within the basic 10-working-day period.

(c) The agency head may delegate authority and duties under (a) and (b) of this section to a full-time employee of the public agency not involved in the denial and not subordinate to the employee responsible for the denial. The employee delegated this authority may not subdelegate to another employee.

2 AAC 96.350. Contents of determination denying appeal

A determination under 2 AAC 96.345 responding to an appeal must be in writing, must specify the specific statute, regulation, or court decision that is the basis for the denial, and must state briefly the reason for the denial. A denial under this section is the final agency decision. A denial must further state that, as provided by AS 40.25.124 , the requestor may obtain judicial review of the denial by appealing the denial to the superior court.

S2S Governance Committee Meeting
Crown Plaza Northstar Hotel, Minneapolis, MN
Schedule of Events

Wednesday, November 8, 2017

Arrive in Minneapolis, MN

6:30 PM	Optional Dinner	TBD

Thursday, November 9, 2017

8:30 AM	Breakfast	Northstar Space
9:00 AM	Crown Plaza Northstar Hotel	Lake Harriet Room

- **Welcome and Introductions**

  Anne Ferro, President & CEO, AAMVA

- **Administration (Call to order, Roll call, & Minutes of previous meeting)**

  Chrissy Nizer & Cindy Taber-Lowry

9:20 AM	**S2S Working Group Update**	
	Sri Prakash	
9:30 AM	**Operations Report**	
	Ashish Regmi	
9:45 AM	**S2S Outreach and Implementation Status**	
	Cindy Taber-Lowry	
10:00 AM	**S2S Financial Review**	
	Philippe Guiot	
10:30 AM	**Break**	
10:45 AM	**US Territories Update**	
	Pam Dsa	
11:30 AM	**Approaches to Initial Load**	
	Ashish Regmi	
Noon	**Lunch (Provided)**	Northstar Space
1:00 PM	**CR Process**	
	Pam Dsa	

1:30 PM	**GC Tasks Update**
	Pam Dsa
1:45 PM	**Guidelines for Resolving Duplicates**
	Loffie Jordaan
2:30 PM	**Break**
2:45 PM	**Duplicate Notification**
	Ashish Regmi
3:30 PM	**Last 5 vs Last 4 SSN Update**
	Ashish Regmi
3:45 PM	**Future GC Meeting Schedule**
	Cindy Taber-Lowry
4:00 PM	**New Business**
	Chrissy Nizer
4:30 PM	**Adjourn**
	Friday, November 10, 2017
	Depart MN

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Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **Thursday, January 25, 2018 (3:00 – 4:30PM EST)**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒ Conference Call (instructions below) ☒ Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted **.**
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Kathy Van Brocklin	NE
Tonie Shields	AR	Jane Schrank	SD
Jay Chilton	AZ	Rick Holcomb	VA
Scott Vien	DE	Kristina Boardman	WI
Karen Ballard	IA	Taylor Rossetti	WY
Alyssa Valdez	ID	Anne Ferro	AAMVA
Steve Leak	IN	Joe Peraino	AAMVA
Melissa Lechner	IN	Ian Grossman	AAMVA
Chrissy Nizer	MD	Philippe Guiot	AAMVA
Jolynn Peck	MI	Joy Whitlow	AAMVA
Clay Johnston	MS	Wendy Sibley	AAMVA
Major Brown	MS	Pam Dsa	AAMVA
Luke McAlpin	MS	Ashish Regmi	AAMVA
David Ezell	MS	Loffie Jordaan	AAMVA
Glenn Jackson	ND	Cindy Taber-Lowry	AAMVA
Sri Prakash	AAMVA		

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Tom Osterbind	Clerus		
Rich Carter	Clerus		
Nancy Carlson	Clerus		

Meeting Schedule/Agenda:

1. Administration
   a. Call to order
   b. Roll call
   c. Minutes of the previous meeting

2. Board of Directors update (C Nizer / P Guiot)

3. Updates to S2S agreement for loading pointers (A Regmi)

4. Cloud migration update (P Guiot)

5. S2S Enhancements update (L Jordaan)

6. US Territories meeting update (C Nizer)

7. S2S Outreach and implementation status (C Taber-Lowry)

8. GC Tasks update (P Dsa)

9. Future GC meeting schedule (C Taber-Lowry)

10. New business (C Nizer)

Next Meeting: **Thursday, February 22, 2018 (3:00 – 4:30PM EST)**

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Meeting Name

S2S Governance Committee monthly meeting (F2F)

Date(s) and Time of Meeting: **Friday, April 20, 2018 (8:00 – 4:00PM CST)**

Agenda Prepared By: **AAMVA**

Location: **Milwaukee Marriott Downtown - Milwaukee, WI & GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted .
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Glenn Jackson	ND
Tonie Shields	AR	Kathy Van Brocklin	NE
Jay Chilton	AZ	Alicia Ortiz	NM
Scott Vien	DE	Kurt Myers	PA
Karen Ballard	IA	Kara Templeton	PA
Alyssa Hudman	ID	Jane Schrank	SD
Steve Leak	IN	Lori Bullard	TN
Melissa Lechner	IN	Rick Holcomb	VA
Sara Lavoie	MA	Pat Kohler	WA
Chrissy Nizer	MD	Kristina Boardman	WI
Jolynn Peck	MI	Taylor Rossetti	WY
Clay Johnston	MS	Anne Ferro	AAMVA
Major Brown	MS	Joe Peraino	AAMVA
Luke McAlpin	MS	Ian Grossman	AAMVA
David Ezell	MS	Philippe Guiot	AAMVA
Paul Cooney	AAMVA	Patrice Aasmo	AAMVA

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Pam Dsa	AAMVA	Julie Knittle	AAMVA
Ashish Regmi	AAMVA	Tom Osterbind	Clerus
Sri Prakash	AAMVA	Rich Carter	Clerus
Loffie Jordaan	AAMVA	Nancy Carlson	Clerus
Cindy Taber-Lowry	AAMVA	Kevin Shwedo	SC
Joy Whitlow	AAMVA	Rhonda Lahm	NE
Wendy Sibley	AAMVA	Jean Shiomoto	CA

Meeting Schedule/Agenda:

1. Administration
   a. Call to order
   b. Roll call
   c. Minutes of the previous meeting

2. Mississippi grant request status (T Osterbind)

3. S2S Financial review update (P Guiot / C Nizer)

4. Review of the S2S GC Charter (P Guiot / C Nizer)

   a. Optimum size of GC
   b. Definition of a S2S participating state

5. DLC / NRVC Compact discussion (J Ross / K Lewis)

6. GC Tasks list (A Regmi)

7. Operations report (A Regmi)

8. CR43 Enhancements update (L Jordaan)

9. S2S Outreach and implementation status (C Taber-Lowry)

10. Future GC meeting schedule (C Taber-Lowry)

11. New business (C Nizer)

Next Meeting: **Thursday, May 24, 2018 (3:00 – 4:30PM EST)**

S2S Governance Committee Meeting
Milwaukee Marriott Downtown, Milwaukee, WI
Agenda

Thursday, April 19, 2018

Arrive in Milwaukee, WI

6:00 – 9:00 PM	Dinner	Rumpus Room 1030 N. Water St. Milwaukee, WI

Friday, April 20, 2018

8:00 AM	Breakfast
9:00 AM	Milwaukee Marriott Downtown

- **Welcome and Introductions**

  Anne Ferro, President & CEO, AAMVA

- **Administration (Call to order, Roll call, & Minutes of previous meetings)**

  Chrissy Nizer & Cindy Taber-Lowry

9:15 AM	Mississippi Grant Request
	Tom Osterbind
9:45 AM	S2S Financial Review
	Philippe Guiot & Chrissy Nizer
10:45 AM	Break
11:00 AM	Review of the S2S Charter
	Philippe Guiot & Chrissy Nizer
Noon	Lunch (Provided)
1:00 PM	DLC/NRVC Compact Discussion
	Jessi Ross & Kevin Lewis
1:45 PM	S2S GC Task List
	Ashish Regmi
2:15 PM	Operations Report
	Ashish Regmi
2:30 PM	Break

2:45 PM	**CR43 Enhancements**
	Loffie Jordaan
3:15 PM	**S2S Outreach and Implementation Status**
	Cindy Taber-Lowry
3:30 PM	**Future GC Meeting Schedule**
	Cindy Taber-Lowry
3:45 PM	**New Business**
	Chrissy Nizer
4:00 PM	**Adjourn**
	Friday, April 20, 2018
	Depart WI

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **Thursday, February 22, 2018 (3:00 – 4:30PM EST)**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒ Conference Call (instructions below) ☒ Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted .
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Kathy Van Brocklin	NE
Tonie Shields	AR	Jane Schrank	SD
Jay Chilton	AZ	Rick Holcomb	VA
Scott Vien	DE	Kristina Boardman	WI
Karen Ballard	IA	Taylor Rossetti	WY
Alyssa Valdez	ID	Anne Ferro	AAMVA
Steve Leak	IN	Joe Peraino	AAMVA
Melissa Lechner	IN	Ian Grossman	AAMVA
Chrissy Nizer	MD	Philippe Guiot	AAMVA
Jolynn Peck	MI	Joy Whitlow	AAMVA
Clay Johnston	MS	Wendy Sibley	AAMVA
Major Brown	MS	Pam Dsa	AAMVA
Luke McAlpin	MS	Ashish Regmi	AAMVA
David Ezell	MS	Loffie Jordaan	AAMVA
Glenn Jackson	ND	Cindy Taber-Lowry	AAMVA
Sri Prakash	AAMVA	Nancy Carlson	Clerus

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Paul Cooney	AAMVA		
Tom Osterbind	Clerus		
Rich Carter	Clerus		

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order**
   b. **Roll call**
   c. **Minutes of the previous meeting**

2. **Updates to S2S Compliance document for loading pointers (A Regmi)**

3. **Change management process update (A Regmi)**

4. **Best Practices and State Procedures manual update (A Regmi)**

5. **Collecting data post go-live (S Prakash)**

6. **S2S User Group meeting update (C Taber-Lowry)**

7. **Update on S2S Enhancements (L Jordaan)**

8. **S2S Outreach and implementation status (C Taber-Lowry)**

9. **S2S Working Group update (M Lechner)**

10. **Future GC meeting schedule (C Taber-Lowry)**

11. **New business (C Nizer)**

Next Meeting: **Thursday, March 22, 2018 (3:00 – 4:30PM EST)**

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **08/31/2017 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ⊠Conference Call (instructions below) ⊠Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted .
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Kristina Boardman	WI
Tonie Shields	AR	Taylor Rossetti	WY
Jay Chilton	AZ	Anne Ferro	AAMVA
Scott Vien	DE	Joe Peraino	AAMVA
Karen Ballard	IA	Ian Grossman	AAMVA
Alyssa Valdez	ID	Philippe Guiot	AAMVA
Melissa Lechner	IN	Tia Glenn	AAMVA
Steve Leak	IN	Pam Dsa	AAMVA
Chrissy Nizer	MD	Loffie Jordaan	AAMVA
Jolynn Peck	MI	Cindy Taber-Lowry	AAMVA
Clay Johnston	MS	Sri Prakash	AAMVA
Major Brown	MS	Wendy Sibley	AAMVA
Glenn Jackson	ND	Ashish Regmi	AAMVA
Kathy Van Brocklin	NE	Tom Osterbind	Clerus
Jane Schrank	SD	Rich Carter	Clerus
Rick Holcomb	VA	Nancy Carlson	Clerus

Meeting Schedule/Agenda:

1. Administration
   a. Call to order (C Nizer)
   b. Roll call (C Taber-Lowry)
   c. Minutes of the previous meeting (C Taber-Lowry)

2. S2S Financial model (P Guiot) – 5 min

3. S2S Working Group update (M Lechner) – 5 min

4. State outreach dashboard (C Taber-Lowry) – 10 min

5. Upcoming funding opportunities (T Osterbind) – 10 min

6. Prioritizing GC tasks (P Dsa) – 15 min

7. Update on usage of partial SSN (AK issue) (P Dsa/P Boyer) – 15 min

8. Duplicate resolution status update (L Jordaan) – 10 min

9. Proposed meeting agenda and meeting schedule (C Taber-Lowry) – 5 min

10. New business (C. Nizer) – 5 min

Next Meeting: **September 28, 2017 (3:00 to 4:30 PM EDT)**

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Meeting Name

S2S Governance Committee

Date(s) and Time of Meeting: **05/12/2017 2pm – 3pm ET**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: Redacted **Access Code:** Redacted

Purpose of Meeting: S2S Governance Committee (GC) follow-up meeting to discuss the results of the Draft Project Priorities that were presented on Thursday, April 27, 2017.

Meeting Attendance:

Name	Jurisdiction/Organization	Attended
Tonie Shields	AR	☒
Walter Anger	AR	☒
Karen Ballard	IA	☒
Kristina Boardman	WI	☒
Ken Brown	MS	☒
Jay Chilton	AZ	☒
Bonnie Fogdall	ID	☐
Rick Holcomb	VA	☒
Glenn Jackson	ND	☒
Steve Leak	IN	☒
Helen Martin	WY	☒

Name	Jurisdiction/Organization	Attended
Chrissy Nizer	MD	☒
Jane Schrank	SD	☐
Marla Thompson	AK	☒
Kathy Van Brocklin	NE	☒
Scott Vien	DE	☒
Anne Ferro	AAMVA	☐
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Lynn Wasylina	AAMVA	☐
Pam Dsa	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Ashish Regmi	AAMVA	☐
Wendy Sibley	AAMVA	☐
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☒
Nancy Carlson	Clerus	☒

Meeting Minutes:

1. **Administration**
   a. **Roll call**
      Roll call was performed by Cindy Taber-Lowry.

2. **Priorities for Grant Applications**
   Cindy presented the original project priorities list that were discussed in the GC meeting that was held on Thursday, April 27, 2017. A poll was distributed to the GC members to rank projects from 1-12, indicating their state's relative priorities of the draft projects. The goal of the exercise was to confirm the project priorities, which will be used to determine which projects will be included in a Change Request to be submitted to Mississippi for the new DHS grant fund that Mississippi has already received.

   Each state's response was logged on an Excel spreadsheet, as seen in slide three of the presentation. A sum was calculated over each row of the spreadsheet to obtain the total number of votes each project received. The lowest total became project number one and the highest total became project number twelve.

   Everyone agreed that the project priority list as shown in slide four made sense and was a good reflection of the collective priority of the states.

   The original project priorities were also compared to the updated project priorities in slide four. The only comment regarding this slide was on project #5, Funding of state expenses (S2S for new states;

enhancements for existing S2S states). The assumption from members was that because there was $800,000 already set aside project #5 scored lower so that enhancements could be funded for existing S2S states. It was pointed out that this assumption was explicitly stated in the poll as originally distributed.

Slides five and six illustrated, by way of an example, how the prioritized project list could be used. Slide five included not only the updated priorities, based on everyone's response but also the amounts of each individual project. These amounts were further broken down in slide six. Cindy explained to the GC that there are essentially three buckets of funding. The first bucket is State Support, which is project #5 that costs $37,545,086. The second bucket is the DIA/FR pilot, which is project #6 that costs $3,706,666. The final bucket is Enhancements, which covers the rest of the projects. The cumulative enhancements total $3,040,913 so if we receive $900,000 in funding we can work on projects 4.2.1, 4.2.2, 4.2.3, 4.2.5, and 2 because the total of all these projects is $871,461.

3. **New business**
   With no other new business brought up, Chrissy then adjourned the meeting.

Notes, Decisions, Issues:

Action Items:

Action Item	Assigned To	Due Date

Next Meeting: **June 1, 2017 (2pm – 3pm EDT)**

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **Thursday, March 22, 2018 (3:00 – 4:30PM EST)**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: **Call** Redacted , **access code** Redacted .
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Glenn Jackson	ND
Tonie Shields	AR	Kathy Van Brocklin	NE
Jay Chilton	AZ	Alicia Ortiz	NM
Scott Vien	DE	Kurt Myers	PA
Karen Ballard	IA	Kara Templeton	PA
Alyssa Hudman	ID	Jane Schrank	SD
Steve Leak	IN	Lori Bullard	TN
Melissa Lechner	IN	Rick Holcomb	VA
Sara Lavoie	MA	Brad Benfield	WA
Chrissy Nizer	MD	Kristina Boardman	WI
Jolynn Peck	MI	Taylor Rossetti	WY
Clay Johnston	MS	Anne Ferro	AAMVA
Major Brown	MS	Joe Peraino	AAMVA
Luke McAlpin	MS	Ian Grossman	AAMVA
David Ezell	MS	Philippe Guiot	AAMVA
Pam Dsa	AAMVA	Joy Whitlow	AAMVA

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Ashish Regmi	AAMVA	Wendy Sibley	AAMVA
Sri Prakash	AAMVA	Tom Osterbind	Clerus
Loffie Jordaan	AAMVA	Rich Carter	Clerus
Cindy Taber-Lowry	AAMVA	Nancy Carlson	Clerus

Meeting Schedule/Agenda:

1. **Administration**
    a. **Call to order**
    b. **Roll call**
    c. **Minutes of the previous meeting**

2. **Resolving potential duplicates (L Jordaan)**

3. **Operations report (A Regmi)**

4. **Update on S2S Enhancements (L Jordaan)**

5. **S2S Outreach and implementation status (C Taber-Lowry)**

6. **GC Task list (A Regmi)**

7. **Future GC meeting schedule (C Taber-Lowry)**

8. **New business (C Nizer)**

Next Meeting: **Friday, April 20, 2018 (8:00 – 4:00PM CST)**

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Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **09/28/2017 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: **Call** Redacted , **access code** Redacted .
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Kristina Boardman	WI
Tonie Shields	AR	Taylor Rossetti	WY
Jay Chilton	AZ	Anne Ferro	AAMVA
Scott Vien	DE	Joe Peraino	AAMVA
Karen Ballard	IA	Ian Grossman	AAMVA
Alyssa Valdez	ID	Philippe Guiot	AAMVA
Melissa Lechner	IN	Tia Glenn	AAMVA
Steve Leak	IN	Pam Dsa	AAMVA
Chrissy Nizer	MD	Loffie Jordaan	AAMVA
Jolynn Peck	MI	Cindy Taber-Lowry	AAMVA
Clay Johnston	MS	Sri Prakash	AAMVA
Major Brown	MS	Wendy Sibley	AAMVA
Glenn Jackson	ND	Ashish Regmi	AAMVA
Kathy Van Brocklin	NE	Tom Osterbind	Clerus
Jane Schrank	SD	Rich Carter	Clerus
Rick Holcomb	VA	Nancy Carlson	Clerus

Meeting Schedule/Agenda:

1. Administration
    a. Call to order (C Nizer)
    b. Roll call (C Taber-Lowry)
    c. Minutes of the previous meeting (C Taber-Lowry)

2. US Territories (A Regmi) – 30 min

3. Review of security document and decision on next steps (P Guiot) – 10 min

4. S2S Working Group update (M Lechner) – 5 min

5. Operations report (C Taber-Lowry) – 5 min

6. S2S Outreach and implementation status (C Taber-Lowry) – 5 min

7. CR updates (L Jordaan) – 10 min

8. GC task updates (L Jordaan) – 5 min

9. IRE Bridge (A Regmi) – 10 min

10. Future GC meeting schedule (C Taber-Lowry) – 5 min

11. New business (C. Nizer) - 5 min

Next Meeting: **November 9, 2017 Face-to-Face (9:00 – 5:00)**

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **Wednesday, December 13, 2017 (3:00 – 4:30PM EST)**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted **.**
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Kristina Boardman	WI
Tonie Shields	AR	Taylor Rossetti	WY
Jay Chilton	AZ	Anne Ferro	AAMVA
Scott Vien	DE	Joe Peraino	AAMVA
Karen Ballard	IA	Ian Grossman	AAMVA
Alyssa Valdez	ID	Philippe Guiot	AAMVA
Melissa Lechner	IN	Joy Whitlow	AAMVA
Steve Leak	IN	Pam Dsa	AAMVA
Chrissy Nizer	MD	Loffie Jordaan	AAMVA
Jolynn Peck	MI	Cindy Taber-Lowry	AAMVA
Clay Johnston	MS	Sri Prakash	AAMVA
Major Brown	MS	Wendy Sibley	AAMVA
Luke McAlpin	MS	Ashish Regmi	AAMVA
Glenn Jackson	ND	Tom Osterbind	Clerus
Kathy Van Brocklin	NE	Rich Carter	Clerus
Jane Schrank	SD	Nancy Carlson	Clerus

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Rick Holcomb	**VA**		

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order**
   b. **Roll call**
   c. **Minutes of the previous meeting**

2. **Non-REAL ID to REAL ID state support (P Guiot)**

3. **S2S Agreement, compliance, and initial load update (S Prakash)**

4. **AAMVA Cloud migration project (P Guiot)**

5. **S2S Outreach and implementation status (C Taber-Lowry)**

6. **US Territories meeting update (C Nizer)**

7. **S2S Enhancements update (L Jordaan)**

8. **S2S User group meeting (C Taber-Lowry)**

9. **S2S Working Group update (M Lechner)**

10. **GC Tasks update (P Dsa)**

11. **Future GC meeting schedule (C Taber-Lowry)**

12. **New business (C Nizer)**

Next Meeting: **Thursday, January 25, 2017 (3:00 – 4:30PM EST)**

S2S Governance Committee Meeting
Arlington, VA
Agenda

Wednesday, May 31, 2017

Arrive in Arlington, VA

6:30 PM	Dinner	Rustico

Thursday, June 1, 2017

8:30 AM	Breakfast	
9:00 AM	AAMVA HQ	Escalade

- **Welcome and Introductions**

  Anne Ferro, President & CEO, AAMVA

- **Administration (Call to order, Roll call, & Minutes of previous meetings)**

  Chrissy Nizer & Cindy Taber-Lowry

9:20 AM	S2S Work Group Update
	Sri Prakash
9:30 AM	State Outreach Update
	Cindy Taber-Lowry
9:50 AM	Operations Report
	Ashish Regmi
10:00 AM	DHS & NHTSA Updates
	Chrissy Nizer
10:15 AM	Break
10:30 AM	S2S Financial Review
	Phillip Guiot & Pam Dsa
Noon	Lunch (Provided)
1:00 PM	SSN (Alaska; related background & 4-digit SSN)
	Pam Dsa
2:00 PM	"Day Forward"
	Loffie Jordaan

3:00 PM	**Break**
3:15 PM	**Best Practices – Customer Notification**
	Ashish Regmi
4:15 PM	**Future Meeting Agenda & Meeting Schedule**
	Philippe Guiot
4:45 PM	**New Business**
	Chrissy Nizer
5:00 PM	**Adjourn**
	Friday, June 2, 2017
	Depart Arlington, VA

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Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **March 22, 2018 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒ Conference Call (instructions below) ☒ Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted **.**
https://global.gotomeeting.com/join/716317581

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/Organization	Attended
Marla Thompson	AK	☒
Tonie Shields	AR	☐
Jay Chilton	AZ	☒
Scott Vien	DE	☐
Karen Ballard	IA	☐
Alyssa Hudman	ID	☒
Melissa Lechner	IN	☒
Steve Leak	IN	☒
Sara Lavoie	MA	☒
Chrissy Nizer	MD	☒
Jolynn Peck	MI	☒
Clay Johnston	MS	☐
Major Brown	MS	☒
Luke McAlpin	MS	☐
David Ezell	MS	☒
Glenn Jackson	ND	☒

Name	Jurisdiction/Organization	Attended
Kathy Van Brocklin	NE	☒
Alicia Ortiz	NM	☒
Kurt Myers	PA	☒
Kara Templeton	PA	☒
Jane Schrank	SD	☒
Lori Bullard	TN	☒
Rick Holcomb	VA	☒
Pat Kohler	WA	☐
Kristina Boardman	WI	☒
Taylor Rossetti	WY	☒
Anne Ferro	AAMVA	☒
Joe Peraino	AAMVA	☐
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Joy Whitlow	AAMVA	☐
Pam Dsa	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Sri Prakash	AAMVA	☒
Wendy Sibley	AAMVA	☐
Ashish Regmi	AAMVA	☒
Paul Cooney	AAMVA	☐
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☒
Nancy Carlson	Clerus	☒

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order (C Nizer)**
      The meeting was called to order by Anne Ferro.

   b. **Roll call (C Taber-Lowry)**
      Roll call was performed by Cindy Taber-Lowry. Deborah Hester attended the meeting on behalf of Tonie Shields. Brad Benfield attended the meeting on behalf of Pat Kohler. A quorum was present.

   c. **Minutes of the previous meeting (C Taber-Lowry)**
      Anne presented the minutes of the previous meeting (2/22/2018). The minutes were approved without change.

2. **Resolving potential duplicates (L Jordaan)**
   Loffie Jordaan reviewed the potential duplicates presentation. This topic was discussed per the request from the S2S Governance Committee (GC) to create guidelines for duplicate resolution; specifically addressing three areas:

   1. Sequence of duplicate resolution
   2. Automated functionality
   3. Timescales for resolving duplicates

The sequence of duplicate resolution and automated functionality recommendations were approved by the GC at the November 2017 face-to-face (f2f) meeting. During that meeting, the GC recognized the S2S Working Group's (WG) suggestion regarding the timescales for resolving duplicates guideline, and also asked AAMVA to perform additional analysis to better understand what was happening in production.

The S2S WG identified the following ideal timeframes when resolving the different potential duplicate combinations:

- Potential duplicates created during real-time transactions, regardless of the type of combination, should be resolved within 96 hours (4 days)
- Potential duplicates created during a states go-live, that involves a CDL, should be resolved within 7 days; if it involves any other type of combination (2 REAL ID{s} or 2 driver licenses) it should be resolved within 30 days

AAMVA concluded that 43% of all driver license/driver license potential duplicate combinations, 70% of all driver license/commercial driver license (CDL) duplicate combinations, and 80% of all REAL ID/REAL ID duplicate combinations that are created during real-time actions, are resolved within 4 days. 80% of all potential duplicates created during real-time actions are resolved within 8-9 days. These numbers reflect a variation in how states are handling their real-time potential duplicates compared to the ideal timeline discussed by the S2S WG.

The same type of analysis was completed for go-live duplicates. States are resolving CDL combinations within 7 days and 2 REAL ID(s), 2 driver license(s) within 30 days. Within 30 days, at most, 20% of all potential duplicates are resolved, with less than 5% resolved within 7 days. The rate at which the go-live potential duplicates are being resolved varies greatly by state.

It was concluded that the go-live potential duplicate resolution timeline varies greatly by state and also varies compared to the ideal timeline suggested by the S2S WG. The challenge is to find a balance between what was set as an ideal goal by the S2S WG, and factors such as resource constraints that play a role in the resolution timeliness. AAMVA realizes that bringing the production resolution times closer to the S2S WG suggested ideal timeline, will take significant resources. Hence, AAMVA recommended that the GC request AAMVA to gather additional information on the resource impact of meeting various target resolution times, including the one set by the S2S WG. Once the additional information is obtained, AAMVA will present it to the GC to help determine potential duplicates best practice timeframes.

Members have asked how their state has been performing compared to other states. AAMVA will be emailing each state their specific statistics, so that they can build expectations for resource projections. It was agreed that it may be too soon for the GC to set resolving potential duplicate guidelines since AAMVA is developing tools in the future that will help states automate this process.

AAMVA will not be engaging the S2S WG at this time, since the S2S WG only represents a small portion of the group. The potential duplicate resolution statistics will allow each member to assess what their particular states require from a staffing perspective to complete this process.

3. **Operations report (A Regmi)**
   Ashish Regmi gave a synopsis of the operations report for the month of February. The monthly SPEXS Privacy and Security Continuous Monitoring State Report, can be found on the GC SharePoint site at https://share.aamva.org/membersvc/commwg/aamvaboard/s2sgc/Meeting%20Materials/Forms/Folder%20Vie w.aspx?RootFolder=%2Fmembersvc%2Fcommwg%2Faamvaboard%2Fs2sgc%2FMeeting%20Materials%2F2018 %2D03%20Meeting&FolderCTID.
4. **Update on S2S Enhancements (L Jordaan)**
   Loffie updated the members on the S2S enhancements. Ashish explained to the new S2S GC members that the S2S WG is a subset of all states that participate in S2S. They meet every week to discuss the S2S enhancements.

5. **S2S Outreach and implementation status (C Taber-Lowry)**
   Cindy summarized the outreach and implementation activities for the members. The S2S implementation calendar was updated with three new columns; driver population, estimated pointer count, and estimated driver population percentage. The updated S2S implementation calendar can be found on the S2S GC SharePoint site under *S2S Announcements* at
   https://share.aamva.org/membersvc/commwg/aamvaboard/s2sgc/SitePages/Home.aspx.

6. **GC Task list (A Regmi)**
   Ashish delivered the S2S GC task list presentation to the members. He explained the GC related tasks that AAMVA staff are currently working on, as well as future tasks that are scheduled to be worked by AAMVA staff.

7. **Future GC meeting schedule (C Taber-Lowry)**
   Cindy reviewed the future GC meeting schedule with the members. The Friday, April 20, 2018 f2f meeting will be held at the same location as the AAMVA Board of Directors meeting in Milwaukee, WI. She encouraged members who have not registered for the f2f meeting to register, so that lodging can be secured for their stay.

   Cindy also reviewed the proposed April f2f agenda and the S2S GC Meeting Roadmap with the members. The S2S GC Meeting Roadmap includes proposed topics that will be covered in future GC meetings.

8. **New business (C Nizer)**
   Chrissy requested volunteers to participate on the S2S Nomination Committee to elect S2S officers. Glenn Jackson, Alicia Ortiz, Jay Chilton, and Rick Holcomb volunteered to participate on the S2S Nomination Committee.

Notes, Decisions, Issues:
Action Items:

Action Item	Assigned To	Due Date
Email members their states potential duplicate statistics	AAMVA	April 2, 2018
Register for the April 20, 2018 S2S GC f2f meeting	S2S GC members who have not yet registered for the f2f meeting	April 2, 2018

Next Meeting: **Friday, April 20, 2018 (8:00 to 4:00 PM CST)**

Meeting Name

S2S Governance Committee monthly meeting (F2F)

Date(s) and Time of Meeting: **11/09/2017 8:30 – 5:00 PM CST**

Agenda Prepared By: **AAMVA**

Location: **Crowne Plaza Northstar Hotel – Downtown Minneapolis, Lake Harriet Room & GoToMeeting**

Type: ☒ Conference Call (instructions below) ☒ Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted .
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Kristina Boardman	WI
Tonie Shields	AR	Taylor Rossetti	WY
Jay Chilton	AZ	Anne Ferro	AAMVA
Scott Vien	DE	Joe Peraino	AAMVA
Karen Ballard	IA	Ian Grossman	AAMVA
Alyssa Valdez	ID	Philippe Guiot	AAMVA
Melissa Lechner	IN	Tia Glenn	AAMVA
Steve Leak	IN	Pam Dsa	AAMVA
Chrissy Nizer	MD	Loffie Jordaan	AAMVA
Jolynn Peck	MI	Cindy Taber-Lowry	AAMVA
Clay Johnston	MS	Sri Prakash	AAMVA
Major Brown	MS	Wendy Sibley	AAMVA
Glenn Jackson	ND	Ashish Regmi	AAMVA
Kathy Van Brocklin	NE	Tom Osterbind	Clerus
Jane Schrank	SD	Rich Carter	Clerus

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Rick Holcomb	VA	Nancy Carlson	Clerus

Meeting Schedule/Agenda:

1. Administration
   a. Call to order
   b. Roll call
   c. Minutes of the previous meeting

2. S2S Working Group update (S Prakash)

3. Operations report (A Regmi)

4. S2S Outreach and implementation status (C Taber-Lowry)

5. S2S Financial review (P Guiot)

6. US Territories update (P Dsa)

7. Approaches to initial load (A Regmi)

8. CR process (P Dsa)

9. GC Tasks update (P Dsa)

10. Guidelines for resolving duplicates (L Jordaan)

11. Duplicate notification (A Regmi)

12. Last 5 vs last 4 SSN update (A Regmi)

13. Future GC meeting schedule (C Taber-Lowry)

14. New business (C Nizer)

Next Meeting: **Wednesday, December 13, 2017 (3:00 – 4:30)**

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Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **07/20/2017 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: Call Redacted   access code Redacted   ,
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Name	Jurisdiction/ Organization
Marla Thompson	AK	Kristina Boardman	WI
Tonie Shields	AR	Helen Martin	WY
Jay Chilton	AZ	Anne Ferro	AAMVA
Scott Vien	DE	Joe Peraino	AAMVA
Karen Ballard	IA	Ian Grossman	AAMVA
Alyssa Valdez	ID	Philippe Guiot	AAMVA
Melissa Lechner	IN	Pam Dsa	AAMVA
Steve Leak	IN	Loffie Jordaan	AAMVA
Chrissy Nizer	MD	Cindy Taber-Lowry	AAMVA
Jolynn Peck	MI	Sri Prakash	AAMVA
Major Brown	MS	Wendy Sibley	AAMVA
Glenn Jackson	ND	Tom Osterbind	Clerus
Kathy Van Brocklin	NE	Rich Carter	Clerus
Jane Schrank	SD	Nancy Carlson	Clerus
Rick Holcomb	VA		

Meeting Schedule/Agenda:

1. Administration
   a. Call to order (C Nizer)
   b. Roll call (C Taber-Lowry)
   c. Minutes of the previous meeting (C Taber-Lowry)

2. S2S Financial model (P Guiot)

3. Enhancements implementation plan (P Dsa)

4. S2S Working Group update (M Lechner)

5. State outreach update (C Taber-Lowry)

6. Free onboarding process (P Guiot)

7. Data disclosure notification (C Taber-Lowry)

8. Collecting statistics (Post-Pilot) (S Prakash)

9. Proposed meeting agenda and meeting schedule (C Taber-Lowry)

10. New business (C. Nizer)

Next Meeting: **August 31, 2017 (3:00 to 4:30 PM EDT)**

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Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **January 25, 2018 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted **.**
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/Organization	Attended
Marla Thompson	AK	☒
Tonie Shields	AR	☒
Jay Chilton	AZ	☐
Scott Vien	DE	☐
Karen Ballard	IA	☒
Alyssa Valdez	ID	☒
Melissa Lechner	IN	☒
Steve Leak	IN	☒
Chrissy Nizer	MD	☒
Jolynn Peck	MI	☒
Clay Johnston	MS	☒
Major Brown	MS	☒
Luke McAlpin	MS	☐
David Ezell	MS	☒
Glenn Jackson	ND	☒
Kathy Van Brocklin	NE	☐

Name	Jurisdiction/Organization	Attended
Jane Schrank	SD	☒
Rick Holcomb	VA	☐
Millicent Ford	VA	☒
Kristina Boardman	WI	☒
Taylor Rossetti	WY	☐
Anne Ferro	AAMVA	☒
Joe Peraino	AAMVA	☐
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Joy Whitlow	AAMVA	☒
Pam Dsa	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Sri Prakash	AAMVA	☒
Wendy Sibley	AAMVA	☒
Ashish Regmi	AAMVA	☒
Paul Cooney	AAMVA	☒
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☐
Nancy Carlson	Clerus	☐

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order (C Nizer)**
   The meeting was called to order by Chrissy Nizer.

   b. **Roll call (C Taber-Lowry)**
   Roll call was performed by Cindy Taber-Lowry. Millicent Ford attended the meeting on behalf of Rick Holcomb. A quorum was present.

   c. **Minutes of the previous meeting (C Taber-Lowry)**
   Chrissy presented the minutes of the previous meeting (12/13/2017). The minutes were approved without change.

2. **Board of Directors update (C Nizer / P Guiot)**
   Chrissy provided the members with a January 2018 AAMVA Board of Directors update. The board approved the decision to set aside fiscal year 2017 net surplus of $4.4 million. Chrissy explained to the board the process that was used to create the S2S GC, as well as key requirements of S2S that were developed when DIVS was the governance model. Some states expressed concern with loading non-REAL ID driver licenses to drivers who do not have lawful presence. Chrissy clarified the point of S2S, which is to support "one driver – one license" explaining to the board that in order to maintain the integrity of the S2S service, every driver has to be added to the Central Site.

   The Board of Directors would like S2S information made available to states who are not yet S2S participants. They would like to see additional materials, such as the S2S agreement and GC meeting minutes added to the S2S AAMVA webpage for members only. The board would also like AAMVA to send regular S2S updates to Chief Administrators through newsletters and / or Anne's regular updates. The board is making this request so that

the membership-at-large is aware of the decisions that the GC is making regarding system, policy, or procedural questions.

In response to the Board of Directors request, Philippe Guiot informed the GC that AAMVA is preparing a communication to send to the states in the coming weeks that will encourage states to plan ahead as far as implementation is concerned and to contact AAMVA early in their process to obtain all necessary information. In the planned communication it is AAMVA's intent to add GC members contact information, so that non-participating states can reach out to GC members if they have S2S questions. GC member contact information will not be shared with the public and will only be shared with Chief Administrators. GC members had no concern with sharing their contact information with Chief Administrators in the communication.

3. **Updates to S2S agreement for loading pointers (A Regmi)**
   Ashish Regmi and Paul Cooney presented the updates to the S2S agreement for loading pointers to GC members. The GC members reviewed the options to load credentials to the Central Site during the December 2017 meeting. They proposed modifying the language within the S2S agreement to address the "one driver / one license" concept, which would mandate that states load their REAL ID(s) and customary driver licenses during a state's go-live weekend. Customary identification cards would continue to be optional. After reviewing the S2S agreement it was decided that updating it would have the following consequences:

   - Need to amend agreement for every policy change
   - Difference states may be signatories to difference versions of the agreement
   - States that have already signed the agreement, may need to re-sign the agreement
   - Legal reviews may be required for policy updates that results in a change to the S2S agreement

   A benefit of updating the S2S agreement would include capturing policy updates within the document.

   AAMVA also reviewed the Enforcement of S2S Compliance document to consider whether or not policy updates could be captured in this document instead of the S2S agreement. Capturing policy updates in the Enforcement of S2S Compliance document will:

   - Retain the flexibility of updating compliance procedures without needing to update the S2S agreement
   - Keep separate the S2S agreement and any policy changes related to compliance

   Drawbacks of capturing policy updates in the Enforcement of S2S Compliance document include:

   - States will need to refer to two separate documents like they do today
   - All states must become aware of any policy update; AAMVA is preparing a communication plan to distribute to the membership-at-large anytime a policy is updated by the GC

   The GC members were asked to vote on keeping the policy changes to the Enforcement of S2S Compliance document, without updating the S2S agreement or updating the S2S agreement when policy changes occur. Glenn Jackson made a motion to keep the policy changes to the Enforcement of S2S Compliance document, without updating the S2S Agreement. Stephen Leak seconded the motion, which was passed unanimously.

   AAMVA will also review the Enforcement of S2S Compliance document to make sure the specifications for states to load non-REAL ID driver licenses during their go-live weekend is clearly written. AAMVA will propose draft language at the next GC meeting on Feb 22nd if necessary.

4. **Cloud migration update (P Guiot)**
   Philippe reviewed the IT strategic roadmap (ITSR) presentation with GC members. The ITSR project addresses the need for AAMVA to take a look at its IT infrastructure. Over the last 6-7 years AAMVA has been doing a major modernization every 2 years (CDLIS, NVTIS, S2S), so AAMVA has grown significantly in terms of number of servers and new systems running on their infrastructure. This has resulted in an increase in operational tasks for

maintaining the infrastructure (patching, bug fixes, etc.) with limited maintenance windows and human resources.

In FY2017, AAMVA embarked in a multi-year initiative to develop a strategic roadmap for its operating environment. As part of that initiative AAMVA hired a firm to assess AAMVA's hosting requirements and how AAMVA can benefit from new infrastructure and technologies. A request for proposal (RFP) was developed to solicit proposals for hosting organizations. AAMVA also developed a migration strategy for moving their systems from their current platform to a new model. In FY2018, AAMVA will begin to migrate their systems as per the migration plan and then develop FY2019's migration plan.

AAMVA has selected Microsoft's Azure as the Cloud platform of choice (both Government and Public Clouds will be used). AIS has been selected as the Managed Service Provider to assist during migration and 24x7 monitoring of AAMVA systems in the cloud. Buy-in has been obtained from the Federal Motor Carrier Safety Agency (FMCSA) the Bureau of Justice Assistance (BJA). Vendor selection and FY2018 migration activities were approved by the ITSR steering committee and the AAMVA Board of Directors. GC members has no questions or concerns with AAMVA ITSR.

5. **S2S Enhancements update (L Jordaan)**
   Loffie Jordaan provided the S2S enhancements update. The series of enhancements referred as CR43 by AAMVA are funded by Mississippi, through a DHS grant. He walked GC members through a high level Gantt chart explaining the timing of the CR43 tasks. Loffie also reviewed current activities associated with CR43. As part of the report to track remaining go-live duplicates (35c) enhancement it was asked if states will have the ability to track the duplicates by type or priority. Loffie will be researching and following-up with the GC, whether it is possible to filter some of the fields in the report to allow a state to track duplicates by type or priority.

   CR43 enhancements such as the manual file exchange (35b) will be implemented as soon as AAMVA has completed the work because it affects all states. The S2S Working Group recently approved the specification for eliminating the manual file exchange after go-live. With this enhancement the Central Site will send out the inquiries to each individual state, for any potential duplicates created during a states go-live process. The state would respond back to the Central Site, allowing the Central Site to include additional information in the Bulk Load output files.

   All other enhancements, except eliminate need for separate inquiry to obtain full SSN after duplicate has been identified (35d) and driver history record administration (35g), may be implemented as standalone items and will be rolled out when completed. 35d will involve changes on the states' side. AAMVA expects this enhancement to be completed sometime next year, with rollout occurring after completion. Driver history record administration (35g), may or may not involve system changes for procedures that states are following or system changes to implement those procedure changes. AAMVA will try to couple 35d and 35g together for rollout sometime in 2019.

6. **US Territories meeting update (C Nizer)**
   Chrissy updated GC members on the US Territories meetings. Chrissy, Kristina, and Rick Holcomb met with representatives from the Virgin Islands (VI) to discuss the decisions made by the GC regarding onboarding the US Territories. They informed VI representatives that a long-term solution is being developed by AAMVA using grant monies that Mississippi is pursuing with the Department of Homeland Security (DHS). Based on previous conversations with DHS, they understand that AAMVA can only onboard a certain number of states to the service per year. Because of this it would make more sense for the VI to implement S2S when funding is available.

   AAMVA met with representatives from Puerto Rico (PR) and FMCSA to discuss PR's interest in joining CDLIS. They are interested in establishing a CDL program that will comply with all CDL requirements, to mirror the states. There are additional follow-up conversations that need to occur with no timeline set at this time. Cindy

will be scheduling a call for PR, similar to what was held for the VI, to better understand where PR is in their REAL ID process.

7. **S2S Outreach and implementation status (C Taber-Lowry)**
    Cindy informed GC members of the S2S outreach and implementation activities that have occurred since December 13, 2017. Communication to all CDLIS and S2S participants informing them of Tennessee and Massachusetts go-live date has been distributed, which included the S2S implementation schedule through the end of 2019.

    A S2S Orientation Overview presentation was provided to Kansas on January 10. During this presentation AAMVA learned that Kansas' implementation date may change. Kansas is in the process of implementing a new central issuance system, which was scheduled to be released January 2018. The release has been postponed until further notice. Because of the postponement, S2S business requirement gathering and development has not and will not begin until their central issuance system is released. The Kansas management team will be meeting to discuss their S2S implementation activities on Monday, January 29. They will be following up with AAMVA as to whether they feel they will be able to successfully implement S2S on July 30, 2018. Kansas will be responsible for paying their one-time implementation fee if they cannot implement S2S on July 30, 2018. If Kansas cannot implement S2S as originally scheduled, Cindy will be reaching out to states to fill the July 2018 implementation slot.

    As part of a states touchpoint meeting, a slide has been created informing states that they are required to load their REAL ID and customary driver licenses during their go-live weekend. Customary identification cards are not required to be loaded during a state's go-live weekend, so if a state does not load their customary identification cards during their go-live weekend they will be loaded on a day forward basis.

8. **GC Tasks update (A Regmi)**
    Ashish delivered the S2S GC tasks update presentation to the members. He explained the GC related tasks that AAMVA staff are currently working on, as well as future tasks that are scheduled to be worked by AAMVA staff.

9. **Future GC meeting schedule (C Taber-Lowry)**
    Cindy reviewed the future GC meeting schedule with GC members. The Friday, April 20, 2018 face-to-face meeting will be held at the same location as the AAMVA Board of Directors meeting in Milwaukee, WI.

10. **New business (C Nizer)**
    With no new business brought up, Chrissy adjourned the meeting.

Notes, Decisions, Issues:
Action Items:

Action Item	Assigned To	Due Date
Develop a S2S newsletter so the membership-at-large is aware of the decisions that the GC is making regarding system, policy, or procedural questions	AAMVA	March 22, 2018
Review the Enforcement of S2S Compliance document to ensure that the specifications for states loading non-REAL ID driver licenses during their go-live weekend are clearly written	AAMVA	February 22, 2018
Research and follow-up with the GC, whether it is possible to filter some	AAMVA	February 22, 2018

of the fields in the report to track remaining go-live duplicates by type or priority		
Schedule a call for PR, similar to what was held for the VI, to better understand where PR is in their REAL ID process	AAMVA	February 8, 2018
Inform Kansas that they are responsible for the one-time implementation charge if they cannot implement S2S successfully on July 30, 2018 Update: AAMVA reached out to Kansas on Thursday, January 25, 2018 to inform them that they are responsible for the one-time implementation charge if they cannot implement S2S successfully on July 30, 2018	AAMVA	January 25, 2018

Next Meeting: February 22, 2018 (3:00 to 4:30 PM EDT)

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: 08/31/2017 3:00 – 4:30 PM EDT

Agenda Prepared By: AAMVA

Location: GoToMeeting

Type: ☒ Conference Call (instructions below) ☒ Online Meeting (instructions below)

Dial In Information: Call Redacted **, access code** Redacted **.**
Redacted

Purpose of Meeting: Monthly meeting of the S2S Governance Committee

Meeting Attendance:

Name	Jurisdiction/Organization	Attended
Marla Thompson	AK	☒
Tonie Shields	AR	☒
Jay Chilton	AZ	☐
Scott Vien	DE	☐
Karen Ballard	IA	☒
Alyssa Valdez	ID	☒
Melissa Lechner	IN	☐
Steve Leak	IN	☒
Chrissy Nizer	MD	☒
Jolynn Peck	MI	☒
Clay Johnston	MS	☐
Major Brown	MS	☒
Glenn Jackson	ND	☐
Kathy Van Brocklin	NE	☒
Jane Schrank	SD	☒
Rick Holcomb	VA	☒

Name	Jurisdiction/Organization	Attended
Kristina Boardman	WI	☒
Taylor Rossetti	WY	☒
Anne Ferro	AAMVA	☒
Joe Peraino	AAMVA	☒
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Tia Glenn	AAMVA	☐
Pam Dsa	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Sri Prakash	AAMVA	☒
Wendy Sibley	AAMVA	☒
Ashish Regmi	AAMVA	☒
Pierre Boyer	AAMVA	☒
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☒
Nancy Carlson	Clerus	☒

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order (C Nizer)**
      The meeting was called to order by Chrissy Nizer.

   b. **Roll call (C Taber-Lowry)**
      Roll call was performed by Cindy Taber-Lowry. A quorum was present.

   c. **Minutes of the previous meeting (C Taber-Lowry)**
      Cindy presented the minutes of the previous meeting (07/20/2017). The minutes were approved without change.

2. **S2S Financial update (P Guiot)**
   Philippe Guiot presented the S2S Financial update, specifically focusing on the decisions made by the AAMVA Board of Directors' at the Annual International Conference (AIC) in August. As part of his update, Philippe also discussed the financial decisions that were approved by the Board during their April 2017 meeting.

   The Board approved the S2S Governance Committee's (GC) recommendation to allocate FY2017/FY2018 contract net surplus (warranty monies + operational surplus) to the S2S program. The Board also approved the S2S GC's recommendation to set FY2019 fees at the level recommended on the original DIVS cost model.

3. **S2S Working Group (WG) update (M Lechner)**
   Cindy gave an overview of the current activities of the S2S WG for Melissa Lechner, who was not able to attend the meeting. Recent discussion topics and the future meeting schedule were presented as part of the WG update.

4. **State outreach dashboard (C Taber-Lowry)**
   Cindy provided the S2S State outreach dashboard presentation, which she explained was updated to replace the previous S2S State outreach PowerPoint presentation. She informed the members that the state outreach map

will be a living document and can be viewed at any time on the S2S GC SharePoint site homepage located at https://share.aamva.org/membersvc/commwg/aamvaboard/s2sgc/SitePages/Home.aspx.

Due to a recent discussion at the Board of Directors' meeting, Chrissy asked if AAMVA had been in contact with vendors who perform IT modernization for the states. There appears to be a lack of understanding between the vendors and the states who are modernizing their systems on the amount of work, specifically the duplicate resolutions, that is associated with implementing S2S. States who are not participating in S2S are concerned about the business process changes that occur due to the implementation of S2S. Philippe undertook to talk to FAST about the concerns discussed at the Board of Directors' meeting.

Kristina Boardman asked AAMVA about the status of the June 1 duplicate resolution action item. It was conveyed to members that a duplicate resolution survey is being sent to the WG members addressing how they work their potential duplicates both go-live and during real-time day-to-day transactions. Once the survey results are compiled, AAMVA will be giving a presentation to the GC so that the Best Practices document can be updated to reflect the recommendations approved by the GC.

5. Upcoming funding opportunities (T Osterbind)
Tom Osterbind discussed the grant request that Mississippi is preparing to submit to Department of Homeland Security (DHS), with the help of AAMVA and Clerus. He addressed the grant request scope, which includes enhancements to permit US Territorial participation, assistance to jurisdictions' implementation efforts, and assistance to jurisdictions' resolution of duplicates.

The cost estimates for this grant request should be complete in late September 2017. Mississippi will finalize the grant request and submit to DHS in early October 2017. If approved, the current assumption is that the funding would be awarded to Mississippi by October 1, 2018. The total period of performance for this grant request is estimated to be 5-6 years but the duration is still being defined.

The question was asked to AAMVA as to whether the Territories' development of a comparable CDL program was being considered as part of the solution similar to what Canada and Mexico has today. AAMVA responded that since the CDL Regulation does not cover the US Territories', AAMVA is not expected to develop a solution similar to what Canada and Mexico has today. However, AAMVA is working with DHS to determine an appropriate solution to allow the territories to meet the S2S Real ID Requirements.

6. Prioritizing GC tasks (P Dsa)
Pam Dsa gave an overview of the key tasks that the AAMVA team is working on. As part of Pam's overview she discussed two new tasks that the members need to prioritize. The first task is the Citizen Request and the second task is Compliance. Cindy will be sending out a poll for members to prioritize these two tasks. The results of the poll will be addressed in a future GC meeting.

7. Update on usage of partial SSN (AK issue) (P Dsa/P Boyer)
Pam provided the background on the social security number/Alaska issue that was discussed at the June 1 GC meeting. As part of that issue, AAMVA had an action item to strengthen their security documentation so that individuals are aware of the steps that AAMVA follows in order to ensure their information is secure.

Pierre-Yves Boyer (PY), reviewed the SPEXS Security Overview with the members; with the goal of providing a synopsis of the security that is in place to protect the pointer index information. AAMVA asked members to review and report back as to whether the document presented by PY is sufficient as written.

8. Duplicate resolution status update (L Jordaan)
Loffie Jordaan provided the members with a duplicate resolution status update. He also encouraged members to review the monthly Operations Report that is published on the GC SharePoint site. The Operations Report covers system availability, pointer counts and upcoming SPEXS training.

Using the duplicate resolution data that is available to AAMVA; Loffie reported that states are working their go-live potential duplicates in a timely manner. Even though the data shows spikes when additional states implement S2S there is a downward go-live duplicate resolution trend. He also discussed the total real-time potential duplicates that are created as a result of a states' normal business day. The real-time duplicates number is increasing. This means that we are creating potential duplicates faster than we are resolving them. According to the spikes in data, one or two states may not have resolved their real-time potential duplicates during a specific duration of time. AAMVA is working with these states to resolve this issue.

9. **Proposed meeting agenda and meeting schedule (C Taber-Lowry)**
   Cindy discussed future S2S GC meeting dates. It was pointed out that due to the November 9, 2017 face-to-face GC meeting, there would not be a meeting in October.

10. **New business (C. Nizer)**
    With no new business brought up, Chrissy adjourned the meeting.

Notes, Decisions, Issues:

Action Items:

Action Item	Assigned To	Due Date
Publish FY2019 S2S fees	**AAMVA**	**September 30, 2017**
Add a slide to the State outreach dashboard presentation showing the estimated percentage of drivers that are represented as part of S2S	**Cindy**	**September 28, 2017**
As part of the meeting minutes email, AAMVA will be attaching the GC Task Priority Poll for members to vote on	**Cindy**	**September 11, 2017**
As part of the meeting minutes email, AAMVA will be attaching the Security Document for members to approve	**Cindy**	**September 11, 2017**

Next Meeting: September 28, 2017 (3:00 to 4:30 PM EDT)

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **12/13/2017 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted **.**
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/Organization	Attended
Marla Thompson	AK	☐
Tonie Shields	AR	☐
Jay Chilton	AZ	☐
Scott Vien	DE	☒
Karen Ballard	IA	☐
Alyssa Valdez	ID	☒
Melissa Lechner	IN	☐
Steve Leak	IN	☒
Chrissy Nizer	MD	☒
Helen Kelly	MD	☒
Jolynn Peck	MI	☒
Clay Johnston	MS	☐
Major Brown	MS	☒
Luke McAlpin	MS	☒
David Ezell	MS	☒
Glenn Jackson	ND	☒

Name	Jurisdiction/Organization	Attended
Kathy Van Brocklin	NE	☒
Jane Schrank	SD	☒
Rick Holcomb	VA	☒
Kristina Boardman	WI	☒
Taylor Rossetti	WY	☒
Anne Ferro	AAMVA	☐
Joe Peraino	AAMVA	☒
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Joy Whitlow	AAMVA	☐
Pam Dsa	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Sri Prakash	AAMVA	☒
Wendy Sibley	AAMVA	☒
Ashish Regmi	AAMVA	☒
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☒
Nancy Carlson	Clerus	☒

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order (C Nizer)**
   The meeting was called to order by Chrissy Nizer.

   b. **Roll call (C Taber-Lowry)**
   Roll call was performed by Cindy Taber-Lowry. A quorum was present.

   c. **Minutes of the previous meeting (C Taber-Lowry)**
   Chrissy presented the minutes of the previous meeting (11/09/2017). The minutes were approved without change.

2. **Non-REAL ID to REAL ID state support (P Guiot)**
   Philippe Guiot updated the Governance Committee (GC) on the discussion that occurred between AAMVA and Department of Homeland Security (DHS) on the impact of a state going from non-REAL ID status to REAL ID status, specifically referencing how this scenario impacts S2S. North Dakota is the only state that this particular scenario applies to. DHS was asked when a state becomes REAL ID compliant do they have to flag all their drivers' licenses with the REAL ID indicator in S2S or is it done on a day forward basis? DHS informed AAMVA, states should be flagging their driver licenses with the REAL ID indicator in S2S once they start issuing REAL ID credentials. DHS will not declare a state REAL ID compliant until the state has begun to issue REAL ID credentials and DHS has reviewed the state's REAL ID application, which could take 6-8 months. In summary when a state issues a new credential using the REAL ID compliance process they are required to flag the REAL ID indicator in S2S.

   During the same discussion AAMVA learned some states are deemed REAL ID compliant even though credentials are being issued without the markings on the card. DHS supports the concept of flagging these credentials with the REAL ID indicator in S2S for now but a question remains on whether these credentials will still be considered REAL ID compliant as of October 2020. The decision will need to be made by the Transportation Security

Administration (TSA) or the appropriate organization whether these credentials will be accepted at face value when there is no markings on the card. DHS continues to encourage these states to replace (via reissuance) REAL ID credentials without the markings with REAL ID credentials that reflect the marking, with the understanding it will take time for states to do so.

3. **S2S Agreement, compliance, and initial load update (P Dsa and S Prakash)**

   Pam Dsa and Sri Prakash provided the S2S Agreement, compliance, and initial load update presentation. Pam summarized the background for the GC, which included Massachusetts (MA) requesting to split their S2S implementation between two weekends and Washington (WA) requesting to only load their REAL ID credentials during their go-live weekend. Because of these requests, AAMVA was asked to review the S2S Agreement and Enforcement of S2S Compliance documents to ensure both documents address the loading of REAL ID and customary driver license credentials when implementing S2S.

   Pam discussed the S2S Agreement and the Enforcement of S2S Compliance with the GC, explaining the correlation between the two documents. She clarified the definition of non-compliance, providing specific scenarios as outlined in the Enforcement of S2S Compliance document. It was pointed out that for states to fulfill the underlying S2S requirements, they should be clear and in one document (probably the S2S agreement). Because of this, the GC proposed AAMVA modify the language within the S2S Agreement to address the "one driver/one license" concept, which would mandate states load their REAL ID and customary driver license credentials during go-live weekend. Customary identification cards would continue to be optional. The S2S Agreement should explain what the standards are for participating in S2S and how these standards are established. The language should be open and transparent clearly requiring states to load their REAL ID and customary driver license credentials when implementing S2S.

   AAMVA shared the recommendations of the ad hoc Working Group (WG) that had been established to review the implications the various load approaches would have on participating S2S states. To help clarify the various load options to the WG and GC, AAMVA titled them "phased" and "selective" approaches. The phased approach consists of states loading their CDLIS and REAL ID(s) or update their CDLIS records only during a state's go-live weekend. All remaining credentials will be added in the future. The selective approach consists of states loading their CDLIS, REAL ID(s), and customary driver licenses during their go-live weekend with states loading their customary identification cards in the future.

   Sri summarized how a phased and selective approach would impact the ad hoc WG participants using the following factors:
   - Compliance Requirements
   - Multiple duplicate files to process
   - Multiple Central Site downtimes
   - Notice of Issuance
   - Time lapse between go-live weekend and future loads (gap period)
   - Delayed exposure to identification card credential
   - Duplicate notification (Pseudo Batch)
   - Duplicate resolution/customer impacts

   Ad hoc WG participants recommended the selective approach that would require states to load their REAL ID and customary driver license credentials when implementing S2S. This approach also allows go-live states to use the online transaction to add pointers for customary identification cards, on a day forward basis. The selective approach was selected by the ad hoc WG participants because it would be least impactful to their particular states.

   Chrissy made a motion to adopt the ad hoc WG recommendation. Stephen Leak seconded the motion, which passed unanimously. Kristina Boardman made a motion that if customary identification cards are not loaded as part of a state's go-live activities, such cards be loaded using the online transaction to add pointers, on a day

forward basis (as opposed to using a pseudo-batch approach). Scott Vien seconded the motion, which passed unanimously.

4. **AAMVA Cloud migration project (P Guiot)**
This topic was not presented in the interest of time.

5. **S2S Outreach and implementation status (C Taber-Lowry)**
In the interest of time the S2S Outreach and implementation status presentation was not provided in its entirety to the GC. Cindy did present the slides related to a request from Rhode Island (RI). RI has asked the GC for an exception, which would allow them to implement S2S in December 2018 instead of July 2019 (the next available implementation month). They are faced with budgetary challenges that would make implementing S2S in July 2019 difficult. The resources that are currently working on RI's system modernization are only budgeted through December 2018, with no allowances to extend their services. Because of this RI will not have the resources to implement S2S successfully in July 2019. After discussion the GC asked AAMVA to work with RI to finalize a date that would be agreeable for both parties.

As part of this discussion, the GC was concerned RI would bump another state out of the 9 "free" spots already allocated to states who followed the S2S implementation charge credit process established in September 2017. Although the GC did recognize the budgetary challenges RI is facing, the GC confirmed that if an exception is made to RI to allow them to implement S2S by end of 2018, RI will not be eligible for the S2S implementation charge credit.

To prevent similar situation with other states, Philippe suggested AAMVA communicate the S2S implementation calendar and process to all non-participating S2S states, which the GC agreed would be the appropriate thing to do.

6. **US Territories (C Nizer)**
This topic was not presented in the interest of time.

7. **S2S Enhancements update (L Jordaan)**
This topic was not presented in the interest of time.

8. **S2S User group meeting (C Taber-Lowry)**
Cindy provided the S2S User group meeting presentation. She shared the S2S user group draft meeting agenda, highlighting each of the suggested topics with the GC. Rick Holcomb made a motion to approve the S2S user group draft meeting agenda that Cindy shared. Glenn Jackson seconded the motion, which passed unanimously. Cindy did inform the GC that she will be following up with them once the date, logistics, and participants are identified.

9. **S2S Working Group update (M Lechner)**
This topic was not presented in the interest of time.

10. **GC Tasks update (P Dsa)**
This topic was not presented in the interest of time.

11. **Future GC meeting schedule (C Taber-Lowry)**
Cindy discussed future S2S GC meeting dates. She suggested the next S2S face-to-face meeting be held on Tuesday, April 17, 2018 in Milwaukie, Wisconsin. Cindy will be reaching out to those attendees who were not able to participate in this particular discussion, to obtain their feedback on the suggested date.

After further discussions AAMVA is proposing Friday, April 20, 2018, so that the S2S GC f2f meeting does not conflict with the AAMVA Executive Board meeting on the 17th.

12. New business (C Nizer)

This topic was not presented in the interest of time.

Notes, Decisions, Issues:

Action Items:

Action Item	Assigned To	Due Date
Modify language within the S2S Agreement to address the "one driver/one license" concept, which would mandate states load their REAL ID(s) and customary driver licenses during a state's go-live weekend. Customary identification cards would continue to be optional	AAMVA	January 25, 2018
Inform MA that the S2S GC did not approve their request to split their S2S implementation between two weekends AAMVA met with MA on Thursday, December 14, 2017. During the call, AAMVA informed MA that they will need to load all REAL ID and Driver License credentials during go-live. MA will implement accordingly.	AAMVA	December 14, 2017
Inform WA that they will have to load their REAL ID(s) and customary driver licenses during their S2S go-live weekend	AAMVA	December 19, 2017

Propose an S2S implementation date of November 2018 to RI Update: AAMVA reached out to RI on Thursday, December 14, 2017 and proposed November 17/18, 2018 as a possible S2S implementation weekend. RI has asked for two weeks to review their project plan and respond to AAMVA.	AAMVA	December 28, 2017
Share the S2S Implementation Calendar with all non-participating S2S states	AAMVA	January 25, 2018
Follow up with the GC once the date, logistics, and participants of the S2S user group meeting are identified	AAMVA	January 25, 2018
Follow up with attendees who were not able to participate in the GC f2f meeting discussion, to obtain their feedback on the suggested April 17, 2018 date Update: AAMVA is proposing Friday, April 20, 2018, so that the S2S GC f2f meeting does not conflict with the AAMVA Executive Board meeting on the 17th	AAMVA	January 4, 2018

Next Meeting: January 25, 2018 (3:00 to 4:30 PM EDT)

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **04/27/2017 3pm – 4pm EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: Call Redacted , access code Redacted .
Redacted

Purpose of Meeting: Monthly meeting of the S2S Governance Committee

Meeting Attendance:

Name	Jurisdiction/ Organization	Jurisdiction/ Organization
Marla Thompson	AK	☒
Tonie Shields (for Walter Anger)	AR	☒
Jay Chilton	AZ	☒
Scott Vien	DE	☒
Karen Ballard	IA	☒
Cindy Francke	ID	☒
Steve Leak	IN	☒
Chrissy Nizer	MD	☒
Ken Brown	MS	☐
Glenn Jackson	ND	☒
Kathy Van Brocklin	NE	☒
Jane Schrank	SD	☒

Name	Jurisdiction/Organization	Jurisdiction/Organization
Rick Holcomb	VA	⊠
Kristina Boardman	WI	⊠
Helen Martin	WY	⊠
Anne Ferro	AAMVA	⊠
Joe Peraino	AAMVA	⊠
Ian Grossman	AAMVA	⊠
Philippe Guiot	AAMVA	⊠
Lynn Wasylina	AAMVA	⊠
Wendy Sibley	AAMVA	⊠
Pam Dsa	AAMVA	⊠
Loffie Jordaan	AAMVA	⊠
Cindy Taber-Lowry	AAMVA	⊠
Tom Osterbind	Clerus	⊠
Rich Carter	Clerus	☐
Nancy Carlson	Clerus	⊠

Meeting Schedule/Agenda:

1. Administration

a. Call to order (C Nizer)
The meeting was called to order by Chrissy Nizer.

b. Roll call (C Taber-Lowry)
Roll call was performed by Cindy Taber-Lowry. Tonie Shields attended the meeting on behalf of Walter Anger.

c. Minutes of the previous meeting (C Taber-Lowry)
Cindy presented the minutes of the previous meeting. The minutes were accepted without change.

2. S2S Work Group update (L Jordaan)
The S2S Working Group Charter editorial changes were reviewed by Loffie Jordaan. A background section and a reference to the standard meeting procedures that AAMVA follows was added to the charter.

3. State outreach update (C Taber-Lowry/R Holcomb)
Rick Holcomb updated the members on the outreach activities that he is performing. Rick and Chrissy had a successful meeting with John-Mark Hack from Kentucky on Friday, April 21, 2017. On Friday, April 28, 2017 they will be meeting with Tennessee.

Cindy presented the State Outreach Activities that was performed at the CDL Coordinator's and IT Meeting that was held in St. Louis, MO.

Scott Vien spoke to Bud Craddock from Rhode Island (RI) who will be implementing their new system modernization project on July 5. After their system is stabilized REAL ID will be their priority so S2S will not be addressed for at least a year. Scott will check back in with Bud in six months.

Scott also spoke to Elizabeth Bielecki from New Hampshire who stated that S2S is not currently on their radar. He explained that as with other jurisdictions that are in the system modernization process S2S is not a priority at this time.

Helen Martin spoke with Lisa Wanke from Montana who would like more S2S information. Helen will be sending an email out to Montana to find out who the go-to person is so that more S2S discussions can occur.

Chrissy spoke with Ray Martinez from New Jersey who stated that they plan on implementing S2S in late 2018/early 2019.

AAMVA will be performing the same type of outreach activities at regionals that was done at the CDL Coordinator's and IT Meeting.

4. Alaska update (M Thompson)

Marla Thompson updated the members on the letter that was sent to Chrissy on April 11, 2017, from Sheldon Fisher, Commissioner. Individuals in Alaska are very concerned about the last five digits of a social security number that are being held in a central database. Marla also submitted a document outlining Alaska's request for a SPEXS design change to use the last four digits of the Social Security Number instead of the last five digits. Loffie explained that assessing the viability of such a change would require the building of a test platform. The S2S Governance Committee then asked AAMVA to prepare an estimate for investigating such a change.

5. S2S Financial review (L Wasylina)

Philippe Guiot and Lynn Wasylina updated the members on the S2S Financial Review that was presented to the AAMVA Board of Directors at the recent board meeting. The Board approved setting aside the projected $1.5 million operating surplus for the post-pilot period of March 2017 to September 2017. Usage of the funds may include:
- FY2018 Operations & Maintenance ($718K)
- On-boarding states ($100K per state)
- Potential added enhancements

The Board also approved setting aside $2.1 million from the FY16 net surplus of the S2S contract for S2S future activities. Usage of the fund may include:
- On-boarding states ($100K per state)
- Revise original cost/fee model downward
- Fund future system enhancements
- Fund future system re-engineering

It was noted that the S2S financial model will be discussed in more detail at the face-to-face meeting on June 1, 2017, and that the outcome of that discussion is expected to include recommendations on how to use the funds now approved by the AAMVA Board.

6. Priorities for grant application (P Dsa)

Pam Dsa presented the list of future projects and their draft priorities, as previously shared. The goal was to confirm the project priorities. This would then determine which projects should be included in a Change Request to be submitted to Mississippi for the new DHS grant funds that Mississippi has already received. The Change Request is due before the next S2S Governance Committee meeting.

Pam explained that the DLA/DLC study to support S2S (#4) is an assessment. This assessment will look at both the DLA/DLC to determine if they need to be separate or need to be merged. It will answer the question: How can AAMVA use the DLA/DLC to help implement S2S?

It was noted that the Mississippi grant request to DHS included provision for the onboarding of eight additional states. To this end, $800,000 was already set aside in the grant request. Because these funds have to be used for this purpose, the priority of project #5 (Funding for state expenses) is not important; project #5 will be included in the Change Request in any case.

Glenn Jackson noted that he would like to see the priority of project #6, "Pilot project using Digital Image Access and Facial Recognition for duplicate resolution), moved from #9 to #2.

Tom Osterbind suggested that the Mississippi grant request be distributed to the S2S Governance Committee members. Mississippi has been awarded the money and has submitted a procurement process that requires AAMVA to submit a change request to their contract. The change request is initially due by the end of May so that Mississippi can go through the formal process of evaluating the proposals.

Philippe suggested that AAMVA send more information to the members so that they can decide on the relative priorities of the projects for their state. AAMVA will also facilitate the collection of this information from states, and set up an additional meeting in May so that the project priority list can be finalized.

7. Future meeting agenda and meeting schedule (P Guiot)

Philippe discussed future S2S Governance Committee meeting topics. AAMVA keeps a running list of priority and backlog topics, which will be reviewed in detail at the face-to-face meeting.

The face-to-face meeting has been confirmed for Thursday, June 1, 2017. It will be at AAMVA's headquarters in Arlington, VA.

8. New business (C. Nizer)

Steve Leak suggested that the monthly S2S Governance Committee meetings be changed from 1-hour to 1 ½-hours due to the important conversations that are occurring.

Cindy informed the members that the S2S FAQ(s) have been updated and are on the S2S Governance Committee SharePoint site. She also informed the group that due to today's topics the monthly S2S Operations Report was not presented but can be found on the S2S Governance Committee SharePoint site.

With no other new business brought up, Chrissy then adjourned the meeting.

Notes, Decisions, Issues:

Action Items:

Action Item	Assigned To	Due Date
Compose a thank you response to Sheldon Fisher, Commissioner (Alaska).	AAMVA	Friday, May 5, 2017
Email the grant draft priority list with additional details to the members with a mechanism to collect each state's priority preferences.	AAMVA	Monday, May 1, 2017
Set-up a GoToMeeting with the S2S Governance Committee for the second week of May to finalize the project priority list.	AAMVA	Monday, May 1, 2017

Next Meeting: **Face-to-face, June 1, 2017 (9am to 5 pm EDT)**

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **09/28/2017 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ⊠ Conference Call (instructions below) ⊠ Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted .
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/Organization	Attended
Marla Thompson	AK	⊠
Tonie Shields	AR	⊠
Jay Chilton	AZ	⊠
Scott Vien	DE	☐
Karen Ballard	IA	☐
Alyssa Valdez	ID	⊠
Melissa Lechner	IN	☐
Steve Leak	IN	⊠
Chrissy Nizer	MD	⊠
Jolynn Peck	MI	⊠
Clay Johnston	MS	⊠
Major Brown	MS	⊠
Glenn Jackson	ND	⊠
Kathy Van Brocklin	NE	⊠
Jane Schrank	SD	☐

Name	Jurisdiction/Organization	Attended
Rick Holcomb	VA	☒
Kristina Boardman	WI	☒
Taylor Rossetti	WY	☒
Anne Ferro	AAMVA	☒
Joe Peraino	AAMVA	☒
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Tia Glenn	AAMVA	☐
Pam Dsa	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Sri Prakash	AAMVA	☒
Wendy Sibley	AAMVA	☒
Ashish Regmi	AAMVA	☒
Pierre Boyer	AAMVA	☒
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☒
Nancy Carlson	Clerus	☐

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order (C Nizer)**
      The meeting was called to order by Chrissy Nizer.

   b. **Roll call (C Taber-Lowry)**
      Roll call was performed by Cindy Taber-Lowry. A quorum was present.

   c. **Minutes of the previous meeting (C Taber-Lowry)**
      Chrissy presented the minutes of the previous meeting (08/31/2017). The minutes were approved without change.

2. **US Territories (A Regmi)**
   Ashish Regmi provided the US Territories presentation. Because US Territories are pursuing REAL ID compliance, they are seeking ways to participate in S2S. Ashish's presentation included use case scenarios, reviewing the existing functions that are available to US Territories, specifically involving a CDL Driver trying to obtain a Driver License in a US Territory. Since US Territories do not fall under the CDL Regulations umbrella they do not have to comply with CDL Regulations, which means US Territories can only own non-CDLIS pointers.

   The members voiced their concerns about creating more work for states, if the US Territories were to implement S2S, at this time. They were also concerned about partially complying with REAL ID because of the lack of credential validation between the states and US Territories. As a result of these concerns, AAMVA asked the members for feedback in regard to creating a temporary solution for the US Territories until additional funding becomes available. The alternative to creating a temporary solution would be to wait another two years and create a permanent solution for the US Territories. All members indicated their desire to wait for two years, when the funding becomes available, to create a permanent solution.

   Anne Ferro reported to the members that the Department of Homeland Security (DHS), specifically Steve Yonkers and his team, are interested in seeing if the S2S GC can assist the US Territories in their pursuit to

comply with REAL ID. Steve Yonkers may request to speak to the GC in the future about this particular issue. The GC asked AAMVA staff to explore an interim step that would be acceptable by all parties until funding is available for the creation of a long term solution.

3. **Review of security document and decision on next steps (P Guiot)**
    Philippe reviewed the SPEXS Security Overview that was originally presented on August 31. At the last GC face to face meeting AAMVA was asked to create a document explaining the security procedures we have in place to protect an individual's PII. The document also addresses why AAMVA uses the last five of the SSN instead of the last four.

    The cost to develop a solution that would further analyze the comparison of using the last four of the SSN instead of the last five was previously estimated to be $140,000. The end solution would require AAMVA to load the same data that is in production today on two separate databases, so that queries can be ran. A new environment would have to be created. This would enable AAMVA to gather statistics on the number of additional duplicates that may emerge by using the last four of a SSN instead of the last five.

    AAMVA asked the members whether the SPEXS Security Overview as written is sufficient or should AAMVA proceed with the analysis. Marla Thompson agreed that the document will be beneficial to those states who are not yet participating in S2S, but in her particular case she would like to continue with the analysis process. Because of this the members asked AAMVA to investigate other viable comparison options that may be available in an effort to assist Marla.

4. **S2S Working Group update (M Lechner)**
    Sri Prakash gave an overview of the current activities of the S2S Working Group (WG) for Melissa Lechner, who was not able to attend the meeting. Recent discussion topics and the future meeting schedule were presented as part of the WG update.

5. **Operations Report (C Taber-Lowry)**
    Cindy gave a synopsis of the Operations Report for the month of August. The monthly SPEXS Privacy and Security Continuous Monitoring State Report, similar to what was previously provided to the DIVS Committee, is now being generated monthly and can be found on the GC SharePoint site at https://share.aamva.org/membersvc/commwg/aamvaboard/s2sgc/Meeting%20Materials/2017-09%20Meeting/S2S%20Continuous%20Monitoring%20Report%2009.28.2017.pdf.

6. **S2S Outreach and implementation status (C Taber-Lowry)**
    Cindy summarized the outreach activities as part of the S2S outreach and implementation status presentation. She provided the members with an implementation charge credit update and reviewed the S2S Implementation Calendar that can be found on the S2S GC SharePoint site at https://share.aamva.org/membersvc/commwg/aamvaboard/s2sgc/Lists/Announcements/DispForm.aspx?ID=8&Source=https%3A%2F%2Fshare%2Eaamva%2Eorg%2Fmembersvc%2Fcommwg%2Faamvaboard%2Fs2sgc%2FSitePages%2FHome%2Easpx&ContentTypeId=0x0104007F5D31F525C83A4883F6891A5D7E1608.

    Kristina Boardman informed the members that Pat Kohler, from Washington has reached out to Wisconsin about sending some employees to Wisconsin to observe their front and back office operations as a result of implementing S2S.

7. **CR Updates (L Jordaan)**
    Loffie Jordaan reviewed the projects that are included as part of Change Request 43, which was in the process of being signed at the time of the meeting. AAMVA has started the business analysis of eliminating the manual file exchange after go-live and Driver History Record (DHR) administration. He also reviewed in detail a new grant request that Mississippi is preparing to cover a solution for US Territory participation, assistance to US States and Territories, and the duplication resolution pilot project.

Mississippi was expected to submit the new grant request to DHS early October 2017, which will hopefully be approved and awarded by October 1, 2018.

8. GC task updates (L Jordaan)

Loffie gave an overview of the key tasks that the AAMVA team is working on. As part of Loffie's overview he discussed two new tasks that the members prioritized. The first task is Compliance and the second task is Citizen Request.

9. IRE Bridge (A Regmi)

Ashish briefed the members on the Interprovincial Record Exchange (IRE) Bridge. The IRE bridge was updated on 08/27/2017 to send a S2S Driver Status query instead of a CDLIS Driver Status query to Canada. This change allows S2S participating states to comply with the IRE agreement that was signed in 1999. This change does not make the IRE bridge nor the Canadian provinces S2S participants. They are still not able to query or add pointers to the S2S central site.

AAMVA is working with CCMTA to revise the current agreement; adding more specific provisions regarding data security and privacy. The current agreement does allow for the exchange of driver status, both CDL and/or non-CDL. Before states can participate in the IRE bridge they will have to sign the agreement, which will be strictly enforced.

10. Future GC meeting schedule (C Taber-Lowry)

Cindy discussed future S2S GC meeting dates. It was pointed out that due to the November 9, 2017 f2f GC meeting, there would not be a meeting in October. Cindy also reminded the members that the December 13 GC meeting is a Wednesday and should already be on their calendar.

A draft November f2f agenda was shared with the members. Cindy asked the members to contact her if there are any additional topics, not already on the agenda, that need to be discussed.

11. New business (C Nizer)

Non-participating S2S representatives are reaching out to AAMVA and GC members, in hopes of receiving grant application language guidance. At this time AAMVA does not have any type of library capturing this language. As a result of that Chrissy has asked the members to email any grant application language they may have, so that Cindy can add it to the GC SharePoint site for future reference.

Chrissy and Cindy are currently, the only contacts listed on the S2S page on AAMVA.org. In an effort to expand the contacts portion of the page; Chrissy asked members if they approved of Cindy adding the GC Contact List to the page. All members approved of Cindy adding the GC Contact List to the S2S page on AAMVA.org.

Notes, Decisions, Issues:

Action Items:

Action Item	Assigned To	Due Date
Identify an interim solution that would allow the US Territories the ability to participate in S2S	AAMVA	November 9, 2017
Investigate other options available to compare using the last four of a SSN instead of the last five	AAMVA	November 9, 2017
Send Cindy grant application language to post on the GC SharePoint site	GC Members	November 9, 2017
Update the S2S page on AAMVA.org to include the GC Contact List	Cindy Taber-Lowry	October 5, 2017

Next Meeting: **November 9, 2017 (9:00 to 5:00 PM EDT)**

Meeting Name

S2S Governance Committee (GC) face-to-face meeting

Date(s) and Time of Meeting: **06/01/2017 9am – 5pm EDT**

Agenda Prepared By: **AAMVA**

Location: **Escalade/GoToMeeting**

Type: ☒ Conference Call (instructions below) ☒ Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted **.**
Redacted

Purpose of Meeting: Monthly meeting of the S2S Governance Committee

Meeting Attendance:

Name	Jurisdiction/ Organization	Jurisdiction/ Organization
Marla Thompson	AK	☒
Tonie Shields (for Walter Anger)	AR	☒
Jay Chilton	AZ	☒
Scott Vien	DE	☒
Karen Ballard	IA	☒
Bonnie Fogdall	ID	☐
Steve Leak	IN	☒
Chrissy Nizer	MD	☒
Jolynn Peck	MI	☒
Ken Brown	MS	☒
Steve Kelly	MS	☒
Clay Johnston	MS	☒

Name	Jurisdiction/ Organization	Jurisdiction/ Organization
David Ezell	MS	☒
Glenn Jackson	ND	☐
Kathy Van Brocklin	NE	☒
Jane Schrank	SD	☒
Rick Holcomb	VA	☒
Kristina Boardman	WI	☒
Helen Martin	WY	☒
Anne Ferro	AAMVA	☒
Joe Peraino	AAMVA	☒
Ian Grossman	AAMVA	☒
Philippe Guiot	AAMVA	☒
Lynn Wasylina	AAMVA	☒
Wendy Sibley	AAMVA	☒
Pam Dsa	AAMVA	☒
Ashish Regmi	AAMVA	☒
Sri Prakash	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☐
Nancy Carlson	Clerus	☒

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order (C Nizer)**
      The meeting was called to order by Chrissy Nizer.

   b. **Roll call (C Taber-Lowry)**
      Members introduced themselves, which satisfied roll call.

   c. **Minutes of the previous meeting (C Taber-Lowry)**
      Minutes from the 4/27/2017 and 5/12/2017 meetings were approved.

2. **S2S Work Group (WG) update (S Prakash)**
   Sri Prakash gave an overview of the current composition and activities of the S2S WG. She also covered how the WG members will reach out to other non-WG members when necessary.

   Since alignment is crucial for WG priorities, Chrissy discussed how priorities for the WG should be set by the GC so that there is no disconnect between the groups. The GC will feed the WG work based on GC

needs. As a result of this conversation Steve Leak will act as a liaison to the WG and all GC members will be granted access to the WG SharePoint site. Melissa Lechner will attend the GC meetings to report on the work that the WG is performing.

3. State outreach update (C Taber-Lowry)

Cindy Taber-Lowry provided an update of S2S outreach activities. She shared the S2S Recruitment Matrix with the committee members to identify lead states for outreach opportunities. The following individuals offered to reach out to the states as listed:

- Connecticut: Scott Vien
- Nevada: Jay Chilton
- New York: Chrissy Nizer
- Ohio: Steve Leak
- Utah: Helen Martin, with assistance from Jay Chilton
- Vermont: Rick Holcomb

Cindy noted that AAMVA will be emailing each lead state with their assigned CDLIS-only states' contact information.

4. Operations Report (A Regmi)

Ashish Regmi walked through the operations report. He discussed availability, response time, and training being provided.

5. DHS & NHTSA Updates (C Nizer)

Chrissy discussed the fact that DHS is making the participation in S2S a requirement not only for the non-REAL ID compliant states but will also add the requirement during the recertification of the states who are already compliant and not yet on S2S. Chrissy also mentioned that a NHTSA is now considering the participation in S2S as another criteria in their state Traffic Records Assessment.

6. S2S Financial review (P Guiot, P Dsa)

The S2S financial model background was provided to the GC by Philippe Guiot. Lynn Wasylina explained to the group how the board-approved funding (2.1M from contract income from FY16) is handled; it is currently invested in an actively managed portfolio. She suggested that the GC should at some point in the future discuss if the money should be invested more conservatively.

Members discussed the basis for calculating state fees. Philippe explained to the members how the monthly fees are compiled based on a state's driver population instead of on the number of pointers a state may have; and why this approach was followed by DIVS when the model was compiled. It was noted that the driver population numbers used in the financial model are based on numbers published by the Department of Transportation for 2012 (see https://www.fhwa.dot.gov/policyinformation/statistics/2012/dl22.cfm), and that population growth numbers published by the Census Bureau was used to estimate driver population numbers for subsequent years.

Philippe talked about the revised cost model showing a positive surplus every year with a cumulated total of $7.9 million in 2023. The group then discussed possible uses of the surplus to encourage state participation particularly the idea of onboarding states for free. A concern was expressed that participating states fees should not be paying for new states to join when states could obtain NHTSA

grants. After discussion it was agreed that NHTSA grants are not a guarantee and that some of the funding is actually coming from FEMA. Philippe pointed out that one free state onboarding is already funded via the current Mississippi contract and that there is an additional $800,000 of funding coming from FEMA to onboard eight additional states for free and if the $800,000 is not used those funds will be lost. The meeting participants agreed that, for now, AAMVA staff should plan to use the funds to onboard nine states for free. AAMVA staff will propose a process for determining how to select the first nine states.

Tonie Shields made a motion that the AAMVA Board of Directors should be asked to allocate the FY17 and FY18 S2S Contract surplus to the S2S program. Major Brown seconded the motion, which was passed unanimously.

7. SSN (P Dsa)

Marla Thompson discussed the Alaska State Legislature letter that was sent to AAMVA on May 22, 2017. She explained that Alaska is asking for S2S to use a 4-digit SSN instead of the 5-digit SSN that is currently used.

Pam Dsa and Loffie Jordaan provided a background of the SSN issue and what it will take for AAMVA to analyze the impact of reducing the SSN from 5 to 4 digits. The group questioned whether it would be more appropriate to focus on the positive aspects of the system and the security measure that are in place today rather than spending the resources to do the analysis.

Tonie Shields mentioned that Arkansas had done a similar analysis for their own DL system and will try to provide the report as this could prevent AAMVA from having to do its own analysis. Since most citizens do not understand the encryption process and how many layers there are it was suggested that AAMVA prepare a document outlining the security features that are in place to protect the data. Scott Vien motioned composing a high-level document that outlines the security features that are in place to protect the data. Jay Chilton seconded the motion, which was passed.

8. Day Forward (L Jordaan)

Loffie explained that during the pilot phase most states loaded all their pointers but this created concerns with the amount of duplicates that were generated during that process and the effort involved in resolving them. The issue of numerous duplicates is often mentioned by perspective S2S participants as the main concern with joining S2S. Loffie presented three options for onboarding states and compared their respective merits and shortfall. There could be a concern that Department of Homeland Security could say options 2 & 3 violate the requirements of the REAL ID Act since not all REAL ID documents would be loaded on Day 1.

After discussion, the members indicated a preference for Option 1 (i.e. all pointers loaded upon go-live, and resolved as quickly as is feasible), with the request that the following be addressed:
- Clear guidelines/standards for resolving potential duplicates, including automated actions, and importance of different groups of duplicates (e.g. involving CDL, DL, etc.)
- Guidelines/timeline to resolve potential duplicates; e.g. six months to resolve duplicates for CDL drivers, 12 months for REAL ID credentials, etc.
- Additional reports to keep track of potential duplicates

Best Practices will need to be updated to reflect this outcome.

9. Duplicate Notification (A Regmi)

Ashish walked through the Duplicate Notification presentation. As a result of this the GC has asked the WG to revisit best practices, focusing on notification (including which cases are more or less important; e.g. when a CDL is involved vs. two DL(s) being involved). The WG should also address (even if in general) what to do with expired credentials.

Wisconsin has added language to their application informing customers that the S2S verification is being performed. Delaware also has language that informs customers their credential may be surrendered at the time of credential issuance.

10. Project Priority List (L Jordaan)

Loffie reviewed the project priority list. Arkansas, Maryland, Indiana and one other state indicated interest in project #6, Pilot project using Digital Image Access and Facial Recognition for duplicate resolution. GC members decided to move project #9, S2S WebUI case management tool for duplicate resolution in between projects 4 & 5. It was pointed out that projects 5 & 8 go together. Projects 1, 2, 3, 4, and 9 are now identified as high priority so AAMVA needs to work on ways to fund this work.

The GC would like for AAMVA to compose a schedule of when the various projects could conceivable come off.

11. Future meeting agenda and meeting schedule (P Guiot)

Philippe discussed future meeting topics. The topics were prioritized based on what the members felt needed to be addressed sooner rather than later. The topic prioritizations is as follows:

1. Best Practice: Disclosure that data collected is subject to verification with other systems. Surrender process and signature (July 20)
2. Collecting information post-pilot (July 20)
3. Citizen request processing
4. "Backing out" a S2S state
5. Defining and measuring compliance

Philippe also shared the future meeting schedule. Chrissy has asked for another GC face-to-face meeting in the fall. This meeting could be held in conjunction to Region III Conference, if possible.

12. New business (C. Nizer)

AAMVA will inform all states when a state implements S2S.

It was mentioned that AAMVA should review its S2S documentation to ensure that it includes all use cases. For example, potential S2S states should be informed that when they implement S2S, paper credential surrender notifications should no longer be mailed to other participating S2S states since this process is automated.

With no other new business brought up, Chrissy adjourned the meeting.

Notes, Decisions, Issues:

Action Items:

Action Item	Assigned To	Due Date
Send an email to lead states with their allocated CDLIS-only states' contact information	Cindy Taber-Lowry	06/06/2017
Onboarding of new states package of documents to include Wisconsin's DIVS use case scenarios and the simplification of IT documentation (Appendix C of the S2S Pilot Evaluation Report)	Cindy Taber-Lowry	06/19/2017
Arkansas to provide analysis on SSN that they performed	Tonie Shields	06/12/2017
Draft a high-level document outlining the security features put in place to protect the data	AAMVA	06/26/2017
Compose a NHTSA grant application template with model language that other states have successfully used	Cindy Taber-Lowry	07/3/2017
Compile a process for implementing the $100k subsidy	Cindy Taber-Lowry	07/10/2017
Compose a schedule of when the various projects could conceivable come off	AAMVA	07/10/2017
Work with Chrissy on best date for a future face-to-face meeting	Cindy Taber-Lowry	06/06/2017

Next Meeting: **July 20, 2017 (3pm to 4:30 pm EDT)**

Alaska State Legislature

Senate

Office of the Secretary

State Capitol, Room 213
Juneau, Alaska 99801-1182
Phone: (907) 465-3701
Fax: (907) 465-2832
Email:senate.secretary@akleg.gov

May 22, 2017

Governance Board
American Association of Motor Vehicle Administrators for the State-to-State
Verification Service
4401 Wilson Boulevard, Suite 700
Arlington, VA 22203

Dear Members of the Governance Board:

In accordance with Uniform Rule 49(b) of the Alaska State Legislature, I am transmitting
to you the following resolution passed by the Alaska State Senate:

> SENATE RESOLUTION NO. 6
> Urging the Alaska division of motor vehicles to advocate for discontinued use of
> social security numbers as a means of identity verification.

Sincerely,

Liz Clark
Senate Secretary

Enclosure
LC/mhl

STATE OF ALASKA
SENATE

2017

Source
SR 6

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**Senate
Resolve No.**
6
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Urging the Alaska division of motor vehicles to advocate for discontinued use of social security numbers as a means of identity verification.

BE IT RESOLVED BY THE SENATE:

WHEREAS the Constitution of the State of Alaska recognizes that people of the state have a right to privacy and bestows on the Alaska State Legislature the duty to protect that right; and

WHEREAS the legislature must balance the privacy rights of Alaskans with their ability to earn a living; and

WHEREAS, under the REAL ID Act of 2005, a person must show federally compliant identification to enter federal facilities and to travel by air; and

WHEREAS access to military facilities and travel by air are essential to thousands of Alaskans who deliver goods to, provide services for, or work on construction projects or in schools located on military bases in the state; and

WHEREAS many Alaskans must travel by air to get to their places of work, including many employees in the mining, fishing, and oil and gas industries; and

WHEREAS, to allow Alaskans to continue using state identification to access

military facilities after June 2017 and to travel by air after January 2018, the REAL ID Act of 2005 requires the state to offer federally compliant identification cards; and

WHEREAS the REAL ID Act of 2005 requires each state to provide access to information contained in its motor vehicle database to the other states for the purposes of verifying identity and ensuring that a person does not concurrently hold a license in more than one state; and

WHEREAS, to satisfy this requirement, the only multi-state verification system that meets the standards of the United States Department of Homeland Security is the State-to-State Verification Service, which is administered by the American Association of Motor Vehicle Administrators; and

WHEREAS the State-to-State Verification Service requires the last five digits of an applicant's social security number to be uploaded to the pointer file; and

WHEREAS social security numbers contain nine digits, and, for numbers assigned before June 2011, the first three digits correspond to the state in which the number was issued; and

WHEREAS, for those Alaskans who share the first three digits of their social security numbers, a data breach in the State-to-State Verification Service would result in the disclosure of eight of the nine digits of their social security numbers; and

WHEREAS social security numbers can be used for identity theft, one of the fastest growing crimes in America, and for other fraudulent purposes; and

WHEREAS Alaska is a member of the State-to-State Governance Board for management of the State-to-State Verification Service;

BE IT RESOLVED that the Senate urges the Alaska division of motor vehicles, as a member of the State-to-State Governance Board, to advocate for the discontinued use of social security numbers by the State-to-State Verification Service as a means of identity verification; and be it

FURTHER RESOLVED that, should the efforts to discontinue use of social security numbers by the State-to-State Verification Service be unsuccessful, the Senate urges the Alaska division of motor vehicles to advocate for the use of either a nonsequential series of digits or fewer digits from a social security number for identity verification; and be it

FURTHER RESOLVED that the Senate urges the other members of the State-to-

State Governance Board to support the effort to change the social security number data needed to use the State-to-State Verification System in order to protect the citizens of their states.

COPIES of this resolution shall be sent to the Honorable Sheldon Fisher, Commissioner, Department of Administration; Marla Thompson, Director, Department of Administration, division of motor vehicles; the Board of Directors of the American Association of Motor Vehicle Administrators; members of the Governance Board of the American Association of Motor Vehicle Administrators for the State-to-State Verification Service; and members of the Executive Committee of the National Conference of State Legislatures.

Meeting Name

S2S Governance Committee monthly meeting (f2f)

Date(s) and Time of Meeting: **11/09/2017 8:30 – 5:00 PM CST**

Agenda Prepared By: **AAMVA**

Location: **Crowne Plaza Northstar Hotel – Downtown Minneapolis, Lake Minnetonka Room & GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: **Call** Redacted **, access code** Redacted **.**
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/Organization	Attended
Marla Thompson	AK	☒
Tonie Shields	AR	☐
Jay Chilton	AZ	☒
Scott Vien	DE	☒
Karen Ballard (Remotely)	IA	☒
Alyssa Valdez	ID	☒
Melissa Lechner	IN	☒
Steve Leak	IN	☒
Chrissy Nizer	MD	☒
Jolynn Peck	MI	☒
Clay Johnston	MS	☒
Major Brown	MS	☒
David Ezell (Remotely)	MS	☒
Glenn Jackson	ND	☒

Name	Jurisdiction/Organization	Attended
Kathy Van Brocklin	NE	☐
Kurt Myers (Remotely)	PA	☒
Jane Schrank (Remotely)	SD	☒
Rick Holcomb	VA	☐
Millicent Ford	VA	☒
Kristina Boardman	WI	☒
Taylor Rossetti	WY	☒
Anne Ferro	AAMVA	☒
Joe Peraino	AAMVA	☐
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Tia Glenn	AAMVA	☐
Pam Dsa	AAMVA	☒
Loffie Jordaan	AAMVA	☒
Cindy Taber-Lowry	AAMVA	☒
Sri Prakash (Remotely)	AAMVA	☒
Wendy Sibley (Remotely)	AAMVA	☒
Ashish Regmi	AAMVA	☒
Pierre Boyer	AAMVA	☐
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☐
Nancy Carlson (Remotely)	Clerus	☒

Meeting Schedule/Agenda:

1. **Administration**
   a. **Call to order (C Nizer)**
      The meeting was called to order by Chrissy Nizer.

   b. **Roll call (C Taber-Lowry)**
      Roll call was performed by Cindy Taber-Lowry. Millicent Ford attended the meeting on behalf of Rick Holcomb. A quorum was present.

   c. **Minutes of the previous meeting (C Taber-Lowry)**
      Chrissy presented the minutes of the previous meeting (09/28/2017). The minutes were approved without change.

2. **S2S Working Group update (M Lechner)**
   Melissa Lechner gave an overview of the current activities of the S2S Working Group (WG).

   As part of the S2S WG update, Cindy explained the idea of a S2S User Group meeting similar to the CDL Coordinator's meeting. After discussion it was suggested that the S2S User Group meeting should run over two days; one full day of S2S discussions with existing S2S states, and half a day focusing on operational issues for those states who have recently or are in the process of implementing S2S. AAMVA was asked to create a high level agenda to present at the December 13, 2017 Governance Committee (GC) meeting, and to investigate combining the meeting with the Spring Workshop.

3. **S2S Financial review (P Guiot)**

Philippe Guiot and Wendy Sibley put forward the S2S financial review to the GC members. AAMVA was asked to insert the date and implementation charge credit note to the Revised Cost Model in future presentations.

Philippe explained that the financial model will be revised in the Spring 2018 once AAMVA completes its Q2 reforecast. The revised model will include the new $3.8 million contract from Mississippi as well as the updated state participation projections.

The delayed hiring of two Business Analysts was mentioned as a concern. Philippe explained to the group the difficulty of finding qualified Business Analysts in the DC/Virginia/Maryland area. Because of this difficulty IT and HR are actively working together to find qualified Business Analysts for the S2S project.

Philippe explained how AAMVA derives the S2S fees. AAMVA currently uses the Total Licensed Drivers published by the Office of Highway Policy Information, Federal Highway Administration, in Table DL-1C, Licensed Drivers by Sex and Ratio to Population – 2012 to calculate S2S fees. The numbers that AAMVA uses are adjusted for growth using the population growth rates calculated from the Interim State Population Projections, 2005, published by the U.S. Census Bureau, Population Division. Philippe proposed that AAMVA continue to use the most recently available Total Licensed Drivers published by the Office of Highway Policy Information, Federal highway Administration, in Table DL-1C, Licensed Drivers by Sex and Ratio to Population – 20XX without adjusting the population growth. He explained to the group that the calculation is based on the ratio of driver counts between states, and that, besides introducing additional variability, the use of census data to adjust for future growth has minimal impact on said ratio. Stephen Leak made a motion to modify the calculation of the per driver fee to use the most recently available Table DL-1C, without adjusting for growth in future years. Major Brown seconded the motion, which passed unanimously.

4. **US Territories update (P Dsa)**

   Prior to Pam Dsa reviewing the US Territories update with the members Philippe provided an update on a recent discussion with DHS regarding the US Territories' participation in S2S. Philippe confirmed that DHS has the same requirement for the US Territories regarding their participation in S2S than for the US jurisdictions. The US Territories do not have to be using S2S before October 2020 to become REAL ID compliant. They do however need to commit to participate and work with AAMVA to establish an implementation plan.

   Pam explained three options that would allow the US Territories to participate in S2S at different levels. The three options were:

   Option 1 - limited participation using S2S Status Request
   Option 2 - on-boarding US Territories without any system modifications
   Option 3 - full US Territory participation only after system modification supporting a comprehensive solution is complete

   Although option one is simple to implement, it does not address the need of finding existing credentials and enforcing the one license – one driver goal that S2S was designed to accomplish. Option two allows the US Territories to add pointers to the Central Site, but administration of potential duplicates identified between a US Territory DL and a CDL from a US State will not be supported (other than being marked as potential duplicates). Option three would require modifications to S2S in order to accommodate the fact that Territories cannot handle CDL pointers. The Territories would join after the system is updated.

   Option 1 was eliminated as not satisfying the requirement to identify other Driver Licenses an applicant may hold.
   Option 2 was not retained due to the potential impact on participating US jurisdiction to absorb additional manual work to address duplicates situation with CDL pointers.
   Option 3 was determined to be the best option to ensure maximum data integrity. Funding for this option is in the process of being submitted to DHS.

Anne Ferro suggested that a small delegation of the GC have a call with the Administrators/Directors of the US Territories to discuss their REAL ID compliance status.

5. **Approaches to initial load (A Regmi)**

Ashish Regmi presented different approaches to initial load. Massachusetts (MA) has requested to split their S2S implementation between two weekends. They would like to update all CDLIS pointers at the Central Site during the first weekend and add all non-CDLIS pointers during another weekend. California (CA) has requested to only load pointers that have SSN(s) associated with them. Washington (WA) is requesting to only load their REAL ID credentials during their go-live weekend. At some point in the future they will be loading their non-REAL ID credentials.

Members confirmed that, as stated in the S2S Compliance Document, participating states should load all Real ID cards and all driver licenses. From a policy point of view it was suggested that a phased S2S implementation could be acceptable if the state in question provided a specific date by when all their credentials will be loaded. Members asked AAMVA to broaden the assessment of the practical feasibility of a phased implementation, and to specifically consider the impact on participating states. It was suggested that an ad hoc group be convened to support this effort.

As a result of the discussion that transpired during this presentation, members would like to review the S2S Agreement and the S2S Compliance document to ensure both documents address the loading of credentials when implementing S2S. Because the S2S members need to adhere to the language in both documents, AAMVA staff need to inform WA that they will be required to load their REAL ID AND driver licenses when implementing S2S. AAMVA will also inform MA that the technical aspects of a partial load over two weekends is still being researched.

6. **Change management process (P Dsa)**

Pam walked the members through AAMVA's proposed change management process (CMP), including a process flow diagram. The members decided that they would like to see all non-emergency change proposals (CP) at a high level in order to vet and prioritize them, and to route them to the WG as necessary. The WG would then be expected to report back to the GC, and the GC would take action as it deems fit. As a result of this discussion the process flow diagram needs to be updated to reflect the GC decision.

7. **Guidelines for resolving duplicates (L Jordaan)**

Loffie Jordaan delivered the guidelines for resolving duplicates presentation. The duplicate resolution survey that was given to all S2S participating states indicated that potential duplicates are resolved in the following order:
- A CDL pointer and a driver's license
- Two REAL ID credentials
- Two driver's licenses

The members were comfortable with this sequence becoming a best practice.

When states automate the identifying and processing of their potential duplicates, the members agreed with the best practice proposed by the S2SWG. This entails assuming that two pointers pertain to the same identity set if the following fields match exactly:
- First name
- Middle initial
- Last name
- Date of birth
- Full SSN

Regarding resolution time it was proposed that any potential duplicate created real-time should be resolved within 96 hours, potential duplicates involving a CDL during any go-live should be resolved within seven days, and potential duplicates that involve two REAL IDs or two driver licenses created during any go-live should be resolved within 30 days. Although members liked the resolution timescale they questioned whether the resolution time was realistic. Members asked AAMVA to look at historical statistics on recent go-lives to report resolution timeframes during the December 13, 2017 GC meeting.

8. Duplicate notification (A Regmi)
Ashish provided the duplicate notification presentation. At this time there are no S2S Best Practice updates required.

9. Last 5 vs last 4 SSN update (A Regmi)
Ashish exhibited the last 5 vs the last 4 SSN update presentation. Philippe explained to the members that the $145,000 is the initial SSN analysis cost. Portion of this cost is associated with setting up the environment to conduct the analysis. There is an initiative under way to migrate the AAMVA infrastructure to the cloud environment. This is currently planned for summer 2018. The cost associated with the SSN investigation environment setup could be reduced if the analysis is conducted once the cloud migration has completed. It was pointed out that the Microsoft cloud is a secure government cloud that is certified as such by the Department of Defense (DOD). Clay Johnston suggested AAMVA investigate the option of allowing Jurisdictions' the flexibility to store either the last 4 or 5 digits of a SSN at the Central Site based on the Jurisdictions' preference. After discussing these options, the members concluded that it is more important to first look at how data is being protected. AAMVA was asked to report back on different security levels (and associated costs) that would be available within a cloud environment.

AAMVA will inform FMCSA that the S2S GC is looking at the last 5 SSN vs the last 4 SSN for privacy reasons. Jolynn Peck offered to address this topic with the CDLIS Working Group during their next meeting.

10. Operations report (A Regmi)
Ashish gave a synopsis of the operations report for the month of September and October. The monthly SPEXS Privacy and Security Continuous Monitoring State Report, can be found on the GC SharePoint site at https://share.aamva.org/membersvc/commwg/aamvaboard/s2sgc/Meeting%20Materials/Forms/Folder%20Vie w.aspx?RootFolder=%2Fmembersvc%2Fcommwg%2Faamvaboard%2Fs2sgc%2FMeeting%20Materials%2F2017 %2D11%20Meeting&FolderCTID.

11. S2S Outreach and implementation status (C Taber-Lowry)
Cindy updated the members on the S2S outreach and implementation activities that have occurred since September 28, 2017. As part of her presentation Cindy shared the Jurisdictions' S2S Testing & Implementation Current Status map that is located on the State to State (S2S) Verification Services webpage at https://www.aamva.org/State-to-State/. Members agreed that this particular map should be maintained. Members also agreed to add the S2S Implementation Status map that is shared during the S2S GC meetings to the jurisdiction only section of the State to State (S2S) Verification Services Documentation webpage located at https://www.aamva.org/State-to-State/.

12. GC Tasks update (P Dsa)
Pam presented the GC tasks update. The members agreed that they would like to see the final S2S Best Practices document before it is published to the AAMVA website. Pam stressed to the members how important grant application examples are and asked them to continue to submit those examples to AAMVA for sharing purposes. AAMVA was asked to update the "Completed" Timeframe/Status to include the completion date. The members asked AAMVA to include CR43 status in the document for future meetings. It was also requested that the post-implementation surveys be included in the business documentation library.

After a lengthy discussion on REAL ID and credential markings and the difficulty in getting clear direction from DHS it was decided that Anne would discuss this issue with the AAMVA Executive Committee on Monday, November 13, 2017.

13. Future GC meeting schedule (C Taber-Lowry)

Cindy showed the future GC meeting schedule. Chrissy asked AAMVA to propose some possible dates in May 2018 for another S2S GC f2f meeting.

14. New business (C Nizer)

Chrissy opened a discussion with the members on access to S2S and interest from DHS and law enforcement. Concern was expressed about maintaining the integrity of the service and protecting the data. It was decided that this particular discussion would be tabled for a future meeting.

It was requested that AAMVA provide an update on the progress on the enhancements to S2S at the December 13, 2017 meeting.

Notes, Decisions, Issues:
Action Items:

Action Item	Assigned To	Due Date
Create a high level S2S User Group meeting agenda	AAMVA	December 13, 2017
Insert date, version number, and implementation charge credit note to the Revised Cost Model in the S2S Financial review	AAMVA	January 25, 2018
Establish a small delegation of the GC so that a meeting with US Territories Administrators/Directors can be scheduled to discuss their REAL ID compliance status	AAMVA and Chrissy Nizer	December 13, 2017
Email the S2S Agreement and S2S Compliance document for the GC members to review	AAMVA	November 20, 2017
Inform MA that AAMVA and the S2S GC is researching the technical aspects of their partial load request	AAMVA	November 14, 2017
Inform WA that they will have to load their REAL ID and driver license when implementing S2S	AAMVA	November 20, 2017
Create an ad hoc working group to review the implications the various load approaches would have on participating S2S states	AAMVA	December 13, 2017
Update the CMP process flow diagram to reflect the GC's decision as stated in Section 06	AAMVA	December 13, 2017
Update S2S Best Practices to reflect the duplicate resolution sequence and automated functionality	AAMVA	December 13, 2017
Research historical statistics on recent go-lives to report duplicate resolution timeframes	AAMVA	January 25, 2018
Inform FMCSA that the S2S GC is looking into using the last 4 SSN vs the last 5 SSN for privacy reasons	AAMVA	December 1, 2017
Inform the CDLIS Working Group that the S2S GC is looking into using the last 4 SSN vs the last 5 SSN for privacy reasons	Jolynn Peck	November 21, 2017
Update the Jurisdictions' S2S Testing & Implementation Current Status map	AAMVA	November 28, 2017
Add the S2S Implementation Current Status map to the State to State (S2S) Verification Services webpage	AAMVA	November 28, 2017

Action Item	Assigned To	Due Date
Review the final S2S Best Practices document with the GC members for approval	AAMVA	January 25, 2017
Submit grant application examples to Cindy Taber-Lowry	GC Members	Ongoing
Discuss REAL ID and credential markings with the AAMVA Executive Committee	AAMVA	November 13, 2017
Propose some dates in May 2018 for another GC f2f meeting	AAMVA	November 20, 2017
Update GC on S2S enhancement activities	AAMVA	December 13, 2017

Next Meeting: **December 13, 2017 (3:00 to 4:30 PM EDT)**

Meeting Name

S2S Governance Committee monthly meeting

Date(s) and Time of Meeting: **07/20/2017 3:00 – 4:30 PM EDT**

Agenda Prepared By: **AAMVA**

Location: **GoToMeeting**

Type: ☒Conference Call (instructions below) ☒Online Meeting (instructions below)

Dial In Information: Call Redacted , access code Redacted ,
Redacted

Purpose of Meeting: **Monthly meeting of the S2S Governance Committee**

Meeting Attendance:

Name	Jurisdiction/ Organization	Attended
Marla Thompson	AK	☒
Tonie Shields (for Walter Anger)	AR	☐
Jay Chilton	AZ	☐
Scott Vien	DE	☒
Karen Ballard	IA	☒
Alyssa Valdez	ID	☒
Steve Leak	IN	☒
Chrissy Nizer	MD	☒
Jolynn Peck	MI	☒
Major Ken Brown	MS	☐
Captain Steve Kelly	MS	☐
Clay Johnston	MS	☒
David Ezell	MS	☒
Glenn Jackson	ND	☒
Kathy Van Brocklin	NE	☒
Arin Diedrich (for Jane Schrank)	SD	☒

Name	Jurisdiction/ Organization	Attended
Rick Holcomb	VA	☒
Kristina Boardman (Absent –Vacation)	WI	☐
Helen Martin	WY	☒
Anne Ferro	AAMVA	☒
Joe Peraino	AAMVA	☒
Ian Grossman	AAMVA	☐
Philippe Guiot	AAMVA	☒
Tia Glenn	AAMVA	☒
Wendy Sibley	AAMVA	☒
Pam Dsa	AAMVA	☒
Ashish Regmi	AAMVA	☒
Loffie Jordaan (Absent –Vacation)	AAMVA	☐
Cindy Taber-Lowry	AAMVA	☒
Sri Prakash	AAMVA	☒
Tom Osterbind	Clerus	☒
Rich Carter	Clerus	☐
Nancy Carlson	Clerus	☒

Meeting Schedule/Agenda:

1. **Administration**
    a. **Call to order (C Nizer)**
    The meeting was called to order by Chrissy Nizer.

    b. **Roll call (C Taber-Lowry)**
    Roll call was performed by Cindy Taber-Lowry. Arin Diedrich attended the meeting on behalf of Jane Schrank. A quorum was present.

    c. **Minutes of the previous meeting (C Taber-Lowry)**
    Cindy presented the minutes of the previous meeting (06/01/2017). The minutes were approved without change.

2. **S2S Financial model (P Guiot)**
    Philippe Guiot presented the S2S Financial model, specifically focusing on FY17 and FY18. He asked members to recommend to the Board allocating FY17 and FY18 net surplus towards the S2S program income. Rick Holcomb made a motion recommending allocating FY17 and FY18 net surplus towards the S2S program income. Steve Leak seconded the motion, which was passed unanimously.

    Philippe also covered FY19 fees, specifically pointing out the per state and implementation fee increases. The cost model does include onboarding three more states in 2018 and four additional states per year after 2018. Due to the difficulty in projecting states implementing S2S, AAMVA and the GC have to rely on the information that we currently have; however, once the funding for onboarding state letters have been sent to non-participating S2S states AAMVA will be revisiting FY19 fees. Rick Holcomb made a motion to adopt AAMVA's recommendation that FY19 fees be left as is. Scott Vien seconded the motion, which was passed unanimously. The proposed fee changes will now be presented to the Board in August with all fee changes published in September.

3. **Enhancements implementation plan (P Dsa)**
   Pam Dsa provided an update on the tasks that will be included in a Change Request to be submitted to Mississippi. The project cost estimates are over a three-year period. The AAMVA Executive Committee approved hiring three of the resources within this fiscal year to begin work on the Change Request prior to MS approval. It is expected that these three additional resources will be on board by the end of September. AAMVA asked the GC to approve the usage of S2S reserves that are now set aside in AAMVA's portfolio as a backstop funding for those three additional positions in the off chance that the Mississippi contract is not awarded. Glenn Jackson made a motion to support this request. Marla Thompson seconded the motion, which was passed unanimously.

   The GC approved the project scope and schedule so that it can be submitted to Mississippi.

4. **S2S Working Group (WG) update (M Lechner)**
   Sri Prakash gave an overview of the current activities of the S2S WG for Melissa Lechner, who was not able to attend the meeting. Recent discussion topics and use case examples were presented as part of the WG update.

5. **State outreach update (C Taber-Lowry)**
   Cindy provided an update of S2S outreach activities. In an effort to update the S2S Recruitment Matrix she identified lead states for outreach opportunities as well as an update from those lead states who had volunteered to perform outreach activities in the past.

6. **Funding for onboarding process (P Guiot)**
   Philippe presented the funding for onboarding process that AAMVA would like to adopt for those jurisdictions who have not implemented S2S. Implementation fee funding is available for the first nine jurisdictions who successfully implement S2S. As a result of this, Philippe walked the GC members through various implementation scenarios using AAMVA's proposed process.

   Members discussed their REAL ID extension letters that were sent by Department of Homeland Security (DHS). During Region I and II Conference, DHS was not clear on what they will require the 42 remaining jurisdictions to have in place in order to be certified as REAL ID compliant. Philippe explained to the members that AAMVA has had that discussion with DHS. At this time, DHS is not expecting all remaining jurisdictions to implement S2S at once; however, they do want to see an active S2S implementation plan in place.

   Even though it is an increase in cost, members did suggest that when the funding for onboarding letters are emailed to the jurisdictions that a hard copy of the letter also be mailed with a return receipt required.

   As to the five U.S. Territories, Philippe updated the members that AAMVA is actively working on possible solutions that will allow the Territories to join S2S. However, before any solutions are implemented AAMVA will be updating DHS, the S2S Working Group, and the S2S Governance Committee for their feedback and/or approval.

7. **Data disclosure notification (C Taber-Lowry)**
   The Data disclosure notification presentation was provided by Cindy. She covered various state credential applications, WG feedback, existing best practices and additional proposed best practice recommendations. As part of the proposed best practice recommendations, members would like to include a statement that is clear and concise on the use of these best practices be dependent on state statutes and regulations. Marla Thompson made a motion that the existing best practices be updated to include the proposed verbiage. Steve Leak seconded the motion, which was passed unanimously.

8. **Collecting statistics (Post-Pilot) (S Prakash)**
   This topic was not presented due to the interest of time.

9. **Proposed meeting agenda and meeting schedule (C Taber-Lowry)**

Cindy discussed future S2S Governance Committee meeting topics and dates. She proposed rescheduling the December 21, 2017 meeting due to the holidays, which was agreed upon by all members.

10. New business (C. Nizer)
With no new business brought up, Chrissy adjourned the meeting.

Notes, Decisions, Issues:

Action Items:

Action Item	Assigned To	Due Date
Present fee changes to the AAMVA Board of Directors' in August with all approved fee changes being published in September	AAMVA	Saturday, August 19, 2017
Send an email to lead states with their allocated CDLIS-only states' contact information as followed: • Montana – North Dakota • New Mexico -Indiana • Oregon – Indiana	Cindy Taber-Lowry	Tuesday, August 1, 2017
When the funding for onboarding letters are emailed to the states a hard copy of the letter should also be mailed with a return receipt required	AAMVA	TBD
Send an email to GC members when the letter explaining the funding for onboarding process is sent to all non-participating S2S jurisdictions	Cindy Taber-Lowry	TBD
Update existing best practices with the approved data disclosure notification verbiage	Cindy Taber-Lowry	TBD
Obtain the exact data disclosure notification verbiage Rick Holcomb (VA) wants to add to their temporary document	Cindy Taber-Lowry	Thursday, July 27, 2017
Create a doodle poll for members to vote on a new proposed date/time for the scheduled December 21, 2017 S2S Governance Committee meeting	Cindy Taber-Lowry	Friday, July 21, 2017

Next Meeting: **August 31, 2017 (3:00 to 4:30 PM EDT)**

MGMT. SYS.
RvA C 466

Certificate

Certificate number: 2015-002

Based on certification examination in conformity with defined
requirements in ISO/IEC 17021:2011 and ISO/IEC 27006:2011,
the Information Security Management System
as defined and implemented by

Rackspace US, Inc.*

located in San Antonio, Texas, United States of America,
is compliant with the requirements as stated in the standard:

ISO/IEC 27001:2013

Issue date of certificate: April 1, 2015
Expiration date of certificate: March 4, 2018

EY CertifyPoint will, according to the certification agreement
dated July 08, 2014, perform surveillance audits and acknowledge the
certificate until the expiration date of the certificate.

*This certificate is applicable for the assets, services and locations as described in the
scoping section on the back of this certificate, with regard to the specific requirements
for information security as stated in the Statement of Applicability version 6.2, dated March 5, 2015.

drs. R. Toppen RA
Director EY CertifyPoint

MGMT. SYS.
RvA C 466

Rackspace US, Inc.
Scope for certificate 2015-002

The scope of the ISMS of Rackspace US, Inc. includes the management of information security in the design, implementation, and support of Hosted Systems within the data center facilities enumerated below as centrally managed out of the Rackspace Headquarters in San Antonio, Texas, United States of America.

The scope of the ISMS applies to all the assets documented within those facilities, such as:
- All IT Equipment;
- A schedule of intangible assets;
- A schedule of key information-related services; and
- Those employees whose skills, knowledge, and experience are considered essential to the Services offered by Rackspace US, Inc. to its customers.

Locations in scope are:
- Rackspace data center DFW1 in Texas, United States
- Rackspace data center DFW2 in Texas, United States
- Rackspace data center DFW3 in Texas, United States
- Rackspace data center IAD2 in Virginia, United States
- Rackspace data center IAD3 in Virginia, United States
- Rackspace data center ORD1 in Illinois, United States

The ISMS mentioned in the above scope is restricted as defined in the Information Security Management Manual, version 1.6, signed on October 16, 2014, by the Director of Governance, Risk and Compliance of Rackspace US, Inc.

State to State Project Priority List

The following table is a list of future projects and their draft priorities, as previously shared. The goal is to confirm the project priorities. This will determine which projects will be included in a Change Request to be submitted to Mississippi for the new DHS grant fund that Mississippi has already received.

Using the *Your Priority* column, please indicate your state's relative priorities of the draft projects. There are 12 projects listed so we ask that you prioritize all 12 projects. That is, please enter one number in each cell in the *Your Priority* column, and do not use any number more than once.

Project #	Short Description	Draft Priority	Your Priority
4.2.1	**Eliminate manual file exchange after go-live** When a state goes live, large numbers of potential duplicates are created for all State to State (S2S) states. The information needed to resolve these is exchanged between states using Excel files, since this is more efficient than obtaining the information using individual manual inquires via S2S. However, the process still requires manual intervention. This project will automate the collection of duplicate information from states. This means that states will no longer have to add information to an Excel file. The standard output files received from the go-live process will already include all the additional information needed to perform duplicate resolution processing.	1	
4.2.2	**Report for tracking remaining go-live duplicates** The process of keeping track of which potential duplicates, created during the go-live process, that remain to be resolved is cumbersome and requires manual work. This project will create a report that states can run from the S2S WebUI to provide an instant view of unresolved duplicates.	2	

Project #	Short Description	Draft Priority	Your Priority
4.2.5	**S2S WebUI summary view of duplicate resolution progress** This project will create, in the S2S WebUI, a dashboard that provides an overview for each state of all its potential duplicates. This will include potential duplicates created during the go-live process, as well as any potential duplicates created after going live. The audience for this dashboard will be managers rather those tasked with resolving individual potential duplicates.	3	
1	**DLA/DLC study to support S2S** This project will examine the proposed Driver License Agreement (DLA), and then will analyze both the Driver License Compact (DLC) and the Non-Resident Violator Compact (NRVC) to determine if these two documents can be updated to achieve what the DLA proposes, or if instead the DLA should replace the DLC and NRVC. Against this background, Project #1 will include the following tasks: • Confirm that nothing will prevent participation in S2S • Confirm that S2S can be updated to fully support the DLA/DLC/NRVC • Identify any areas within the DLA/DLC/NRVC that may need to be updated, or that may benefit from being updated, given the existence of S2S	4	
2	**Analysis: What needs to be done for S2S to support DHR administration** The goal of Project #2 is to determine what will be needed to use S2S to track and administer driver history records (DHR) for non-CDL drivers (as opposed to tracking and administering credentials), and what loopholes exist. The purpose of this analysis is to compile a comprehensive inventory of cases where the existing S2S solution falls short of full DHR administration, and to identify potential solutions. Project #2 is a prerequisite for Project #4.1.	5	

Project #	Short Description	Draft Priority	Your Priority
4.1	**Enhance S2S to support DHR administration** Although Project #2 will finalize the content of Project #4.1, the expectation is that Project #4.1 will cover the following tasks: • Review the AAMVA Code Dictionary (ACD) to determine if there are additional codes required in the ACD to facilitate the exchange of DHR records for non-CDL drivers between states, and if so, what those codes are • Define DHR timeliness, accuracy and completeness objectives—that is, define what a DHR will consist of, and how current the information should be. • Define solutions and mechanisms for monitoring DHR timeliness, accuracy and completeness • Build, test, and implement the solutions to support DHR administration, and provide state support Project #2 must be completed before starting Project #4.1.	6	
4.2.3	**Eliminate need for separate inquiry to obtain full SSN after duplicate has been identified** This project will do for potential duplicates created during "live" transactions what project #4.2.1 does for potential duplicates created during the "go-live" process. When a potential duplicate is created, instead of having to send a separate inquiry directly to the other State of Record after receiving a duplicate notification message, the Central Site will send such an inquiry and populate the resulting information in the duplicate notification message.	7	
5	**Funding of state expenses (S2S for new states; enhancements for existing S2S states)** Approximately $800,000 to cover this project was explicitly allocated in the DHS grant to Mississippi. This money will likely be spent on state expenses regardless of the priority assigned to Project #5. The priority assigned by states could however impact additional future funding that may become available.	8	
6	**Pilot project using Digital Image Access and Facial Recognition for duplicate resolution** This project will provide a grant to a state to facilitate a multi-state effort to develop a best practice method for states to resolve potential duplicates. Specifically, the goal is to determine if two pointers in a potential duplicate pair are for the same identity set and the same person. The best practice method would focus on combined use of tools such as Digital Image Access or one-to-one facial recognition.	9	

Project #	Short Description	Draft Priority	Your Priority
4.2.6	**S2S WebUI case management tool for duplicate resolution** This project will enable states to view all information about individual potential duplicate pairs, and will enable the two states involved to add notes and images that may be of benefit to the other state.	10	
4.2.4	**Track duplicate resolution reason** This project will allow states to record whether a potential duplicate pair was a "true" duplicate or a false positive. A field to capture this information will be added to existing SPEXS messages. The value for this field can then be used to resolve a potential duplicate situation.	11	
4.2.7	**Supporting states to selectively implement enhancements** For all the solutions discussed in this list, it is assumed that all states will implement whatever solutions become available. If, instead, states would prefer to choose which features to implement, a new versioning approach must be designed, developed, and implemented to support such flexibility.	12	

Enforcement of S2S Compliance

Version 1.0
October 28, 2016

Table of Contents

1 ENFORCEMENT OF S2S COMPLIANCE

1.1 *Purpose*

This document is intended to provide information that defines compliance with the State-to-State Verification Service (S2S) and how it will be enforced. It is an attachment to the S2S User Agreement, which is the legal vehicle by which compliance is enforced.

1.2 *Status*

Table 1 Document Status

Item	Status
Document Title	Defining Enforcement of S2S Compliance
Disposition/Status	**Version 1.0**
Primary Contact, Organization	David Ezell, MS Department of Public Safety
Secondary Contact, Organization	Luke McAlpin, MS Department of Public Safety

1.3 *Revision History*

Table 2 Document Revision History

Version	Date	Author(s)	Description of Changes	Executive Committee Approval Date
0.1	9/29/2016	MS Staff/PMO	Initial Draft	
0.2	10/03/2016	MS staff/PMO	Internal comment	
0.3	10/04/2016	MS staff/PMO	Internal Comment	
0.4	10/7/2016	MS staff/PMO	Comments from AAMVA and Clerus staff	
0.5	10/19/2016	MS staff/PMO	Comments from Pilot States	
0.6	10/25/2016	MS staff/PMO	Comments from AAMVA and Clerus staff	
1.0	10/28/2016	MS staff/PMO	Approval of the DIVS EC	

1.4 *References*

- S2S User Agreement

2 INTRODUCTION

The State-to-State Verification Service was developed under a grant from the US Department of Homeland Security (DHS) given to the Mississippi Department of Public Safety (MSDPS). MSDPS formed the DL/ID Verification Systems (DIVS) organization to provide input and guidance to Mississippi for the development and operation of the S2S Pilot, among other things. On March

1, 2017, S2S will transition from pilot to post-pilot and Mississippi and DIVS will transition governance of S2S to AAMVA.

As the S2S service moves from pilot operations to post-pilot operations, the participating states will need to understand their responsibilities regarding compliance. As such it is important for states to understand:

- What constitutes a violation of compliance,

- How remediation of violations will occur and

- What penalties, if any, would be applied if violations are not addressed by the offending state.

It is important to note that S2S will not be governed by the Federal Government. It was developed by the states, for the states. As such, S2S will be governed by the states that participate in the program.

Since S2S will be governed in the post-pilot phase by the participating states, it is appropriate for those states to also define enforcement of S2S compliance. This document reflects the decisions made by the S2S pilot states in the Fall of 2016 regarding enforcement of S2S compliance and, when finalized, will be the definition of enforcement in effect on March 1, 2017. It is acknowledged that as S2S matures, the definition of enforcement may need to change. That change would be identified and approved using a process identified by the S2S Governance Committee.

It should be noted that, based on the approved S2S Financial Model, AAMVA will conduct a compliance review on a given state once every 5 years.

The following statements are assumptions that underlie the approach to enforcement of compliance with S2S:

- The priority is to assist states with resolving operational issues such that they don't become compliance issues.
- It is understood that short term or occasional operational issues may occur. These situations are not considered compliance issues within S2S.
- In any circumstance where operational issues have occurred, the state will be notified of the concern and given an opportunity to remediate the problem.
- If the state is unable or unwilling to address the operational issue, the item will be passed to the S2S Governance Committee to determine if it will be considered a compliance issue.
- **The assessment of penalties will only relate to non-remediated operational issues that have been identified by the S2S Governance Committee as compliance issues.**

3   S2S ENFORCEMENT RESPONSIBILITY

The S2S Governance Committee, composed of participating states and created under the AAMVA Board of Directors, has the responsibility to enforce compliance with S2S. It may, at its discretion, create a sub-committee to take the lead with investigating non-compliance issues and recommending remediation activities and/or penalties. If a participating state is found to be out of compliance, application of penalties is not automatic nor are they required to be applied. Rather, the S2S Governance Committee has the discretion to apply or not apply penalties as they see fit.

4   IDENTIFICATION OF COMPLIANCE ISSUES

Compliance issues can be identified in various ways.

- Participating states may observe activities that appear to be operational issues and can report those to the S2S Governance Committee and to AAMVA staff.
- AAMVA staff may become aware of activities that appear to be operational issues via its monitoring of daily operations.

Regardless of how the issue came to light, AAMVA staff will take the lead by working with the state(s) that appears to have the issue to determine if remedial action is needed and if so, at what level. If AAMVA staff can address the issue with the state(s) it will do so. If the issue isn't resolved between AAMVA staff and the state(s), it will be brought to the S2S Governance Committee for further review. It is acknowledged that all participating states could be impacted by a single state's operational issues and every effort will be made to inform the participating states of the situation so that the impact can be minimized.

5   DEFINITION OF NON-COMPLIANCE

For S2S, non-compliance is defined as the condition where a participating state is doing things differently than the way they have been defined in S2S documentation **such that it is**:

- Disrupting the integrity of the service (e.g. disrupting the one driver/one license concept)

or

- Negatively affecting the other states that are using the service. (e.g. unfairly cause an increased amount of resources to be applied by the other states using the service.)

or

- Unfairly impacting citizens.

This definition conveys the intent that, by using S2S, states will work cooperatively together for the greater good.

Failure to pay S2S User Fees will cause a state to be deemed non-compliant.

5.1 *Examples of Operational Issues That Could Lead to Non-Compliance*

The following are examples of circumstances that could cause a state to be deemed non-compliant. These examples are not intended to be exhaustive. Rather, they are shown to convey the types of things that could cause a state to be deemed non-compliant.

State System Availability

Chronic system downtime can be grounds for a state being deemed non-compliant.

State System Response Times

Chronic slow response times can be grounds for a state being deemed non-compliant.

State Privacy and Security Safeguards

The privacy and security safeguard requirements for S2S are articulated in the S2S User Agreement. A lapse in adhering to the stated privacy and security safeguards can be grounds for a state being deemed non-compliant.

The Correct Format, Content and Coding of Electronic Messages

S2S has a structured testing process that is followed prior to allowing a state to use S2S in production. The compliance concern is that over time, states can unintentionally change the code that supports their use of S2S in such a way as to be non-compliant. Because of the way that S2S and CDLIS are constructed, it is possible for a state to mis-code S2S messages while at the same time correctly coding CDLIS messages. Participating states will need to ensure that they are, at a minimum,

- Properly responding with the correct driver record
- Properly responding with a complete driver record
- Properly responding with conformant and accurate data

Issuance Office Activities

The participating states have defined issuance office activities that need to be followed by all states using S2S in order for S2S to provide the expected benefits. Chronic failure to conduct credential issuance operations as agreed upon by all participating states can be grounds for a state being deemed non-compliant.

Examples include but are not limited to:

As the new issuing state:

- Failure to conduct due diligence within the issuance process
- Failure to take appropriate action when maintaining the pointer index as part of the issuance process
- Failure to take appropriate action when credentials become obsolete
- Failure to notify the customer of potential credential cancellations

As the previous issuing state when a new credential is issued in another jurisdiction;

- Failure to cancel the credential associated with a change state of record
- Failure to cancel the credential associated with the duplicate on an Add, in the circumstance where multiple credentials are not allowed
- Failure to notify the customer of cancellations
- Failure to abide by the privacy and disclosure requirements of S2S
- Failure to be responsive in working with other states to resolve specific issuance issues (ex. resolving possible duplicates)
- Failure to have a process thorough enough to minimize the impact on citizens

Updating of the Pointer Index

Failure to update the pointer index as agreed upon by all participating states can be grounds for a state being deemed non-compliant.

6 PENALTIES IF COMPLIANCE VIOLATIONS ARE NOT ADDRESSED BY THE OFFENDING STATE

Since S2S is voluntary and S2S works best when all states are participating, great care should be given to determine penalties for non-compliance. That said, with no penalties at all, compliance may become problematic.

The following penalties have been identified for non-compliance with S2S:

- The offending state could be deemed ineligible for participating on the S2S governance committee and/or ineligible to vote on S2S policy issues.

If a participating state is found to be out of compliance, application of penalties is not automatic nor are they required to be applied. Rather, the S2S Governance Committee has the discretion to apply or not apply penalties as they see fit.

APPENDIX A: Detailed Description of Non-Compliance Scenarios

The following detailed examples of non-compliant scenarios is provided in the event that the reader would like further explanation of circumstances that can lead to a state being deemed non-compliant.

A core function of the S2S Central site processing is preventing the establishment of two pointers for the same person that meet any one or more of the following conditions:

1. Two drivers licenses
2. Two REAL ID cards
3. A driver license in one state and a CDLIS record in a different state

The scenarios described in this section describe situations where a State fails to properly interact with the S2S central site or with other States. When a State chronically makes mistakes of the types described, especially when it is the same type of mistake being made, that State could be considered non-compliant.

- **Not submitting an inquiry to the central site prior to the issuance of any driver license.**
It is essential that a State submit an inquiry to the central site prior to issuing any driver license card. Failure to do so defeats the purpose of the S2S service, and can result in the issuance of multiple driver licenses to the same person, exactly what the S2S is intended to prevent. Such an action not only disrupts the integrity of the service, but also can unfairly result in another state needing to expend resources to resolve potential duplicates.

- **Not submitting an inquiry to the central site prior to the issuance of any REAL ID credential.**
If a State intends to issue a REAL ID credential, it is essential that the State submit an inquiry to the central site prior to issuing it. Failure to do so defeats the purpose of the S2S service, and can result in the issuance of multiple REAL ID cards to the same person. Such an action not only disrupts the

integrity of the service, but also can unfairly result in another state needing to expend resources to resolve potential duplicates.

- **Not initiating a CSOR when it is required.**

When a State issues any driver license, that State must perform a CSOR on any existing pointer for a driver license or any CDLIS pointer that belongs to another state. Similarly, when a State issues a REAL ID card, that State must perform a CSOR on any existing pointer for a REAL ID card that belongs to another state. Failure to do the CSOR and doing an ADD or Update instead unnecessarily creates a prohibited set of potential duplicates[1]. Such an action not only disrupts the integrity of the service, but also can unfairly result in another state needing to expend resources to resolve potential duplicates.

- **Not cancelling a license when receiving a CSOR.**

When a State receives a CSOR from another jurisdiction, they must cancel the license that relates to that CSOR. If the license isn't canceled, the individual that holds that credential will effectively have two active credentials when in actuality they should only have one. Such an action not only disrupts the integrity of the service, but also can unfairly result in another state needing to expend resources to resolve potential duplicates.

- **Failing to send a Notice of Issuance to another state when it is required.**

It is possible that an issuing State may believe that a person holds a driver license or identification card in another S2S participating State but for which there is no pointer. In this situation, the issuing state must send a Notice of Issuance to the other State. Failing to send the Notice of Issuance denies the other State the opportunity to enforce its own policies regarding a person simultaneously holding credentials in more than one state, thus disrupting the integrity of the service.

- **Failing to ensure that the State has a pointer for every REAL ID card it has issued and every driver license it has issued since implementing S2S.**

When a State implements S2S, that State must create a pointer for all of its existing REAL ID cards, and it may also create pointers for its other existing cards. After implementation, the State must insure it has a pointer for every driver license and/or REAL ID card it issues by submitting an ADD, UPDATE, or CSOR as appropriate in the given situation. Failing to do this results in the creation of a "missing pointer" situation, which adversely impacts the integrity of the service.

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[1] The exception would be when the issuing State believes that the existing pointer is not for the same person to whom it is issuing. In this case, the issuing State would do an ADD or UPDATE, as appropriate, and then work with the State owning the other pointer to mark the two pointers as unique.

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- **Failing to DELETE a pointer when the matching record is no longer available from the State's own system.**

When a State removes the record pertaining to a driver license or identification card from its local system so that it is no longer electronically available to other states, that State must also DELETE any pointer associated with the credential for which the history was removed. Failure to do this results in the creation of a "broken pointer", which adversely impacts the integrity of the service.

- **Failing to respond to another state's request for information in a timely and accurate manner when required to do so.**

In some situations, a State may not be required to send information in response to a request sent by another State. However, when the response is required, the State must respond in a timely manner and with the correct information. Failure to do this not only affects the integrity of the system, it can unfairly cause the requesting state to expend additional resources. Responding with information about the wrong person could also unfairly impact a citizen.

- **Failing to inform an applicant of the ramifications of accepting a driver license or identification card that the state is issuing.**

An applicant should understand that when a state issues them a card, that action could result in the cancellation[2] of any card held in another state, regardless of whether the applicant has reported holding that card. Applicants should also understand what actions the issuing State may take if the applicant subsequently obtains a card issued by another State. Failure to provide this information creates situations in which citizens are treated unfairly, or at least perceive that they were. Moreover, other States may be unfairly required to expend resources to deal with complaints from citizens and resolve related issues.

- **Failing to notify a credential holder when the credential is cancelled.**

States must make a good faith effort to insure that credential holders are aware that a credential has been cancelled. The apparent lack of a current mailing address and similar issues can hamper sending a notification to a credential holder when a State cancels a credential. However, if no notification is sent, a citizen can believe that they have been treated unfairly by having no knowledge that the credential is no longer valid. This is especially problematic when the person's credential was cancelled in error.

- **Failing to use due diligence in the resolution of potential duplicates.**

The resolution of potential duplicates, especially those resulting from bulk loads of pointers from states when they implement S2S, is challenging, and inevitably not every case will be correctly resolved on the first attempt. However, if a State consistently reaches incorrect conclusions (either

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[2] A state may use different terms for this action.

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cancelling a license that shouldn't be cancelled or letting a license stand that should be cancelled), this could be considered non-compliance. A large number of incorrect results will create additional work for other states to rectify the errors, causing them to unfairly expended resources. Also, frequent errors could results in a large number of citizens complaining about unfair treatment, which will in turn result in undermining perceptions about the integrity of the S2S service.

PCL XL Error

     Subsystem: KERNEL

     Error: IllegalTag

     File Name: kernel.c

     Line Number: 1921

S2S Implementation Calendar

2018	Jan		
	Feb	Tennessee	
	Mar	Massachusetts	
	Apr		
	May	Pennsylvania	
	Jun	New Mexico	
	Jul		
	Aug	Mississippi	
	Sep	Washington	
	Oct	Louisiana	
	Nov	North Carolina	
	Dec		
2019	Jan	Utah	
	Feb	Illinois	
	Mar	Missouri	
	Apr		
	May	Maine	
	Jun	Rhode Island	
	Jul	Texas	
	Aug		
	Sep		
	Oct		
	Nov	Montana	
	Dec		

* *Months greyed out are months with no implementation

SPEXS Cyber Security Methodology Summary

Overview

The cyber security process conducted for the State Pointer Exchange Services (SPEXS) follows the Risk Management Framework (RMF) developed by the National Institute of Standards and Technology (NIST) as directed per the Federal Information Security Management Act (FISMA) of 2002. The RMF is a structured security and privacy lifecycle methodology that leverages the various NIST security/privacy standards and guidelines. Below are the core components of the RMF.

1. The selection, documentation and planning of the security/privacy controls per the recommendations from the *NIST Special Publication 800-53A Rev 4: Assessing Security and Privacy Controls in Federal Information Systems and Organizations: Building Effective Assessment Plans*.

2. Implementation of the security/privacy controls in accordance security plan

3. Independent assessment of the security/privacy control implementation

4. Remediation plans define as part of the Plan of Action and Milestones

5. Ongoing monitoring of key controls (e.g., system and database access)

As prescribed in the methodology, a full assessment should be completed every three years, or along with any major change affecting the system. During the interim, the ongoing monitoring (also referred to as "continuous monitoring") is conducted to ensure that key controls continue to meet expectations.

The full RMF methodology was applied to SPEXS and incorporated into the system development lifecycle.

Security and Privacy Controls Synopsis

The security and privacy controls included in the security plan and assessment covered 300+ specific controls and were grouped into four categories:

1. **Management Controls**

   a. Formal information security/privacy program

   b. Security in the system development lifecycle

   c. Security strategies and annual plans in place

2. **Operational Controls**

    a. Formal security/awareness programs

    b. Configuration and change management procedures

    c. Contingency plans/disaster recovery

    d. Security incident response procedures

    e. Media protections (hardcopy, tapes, disk, and other electronic media)

    f. Physical protections

        i. Datacenter physical access protections

        ii. Visitor controls

        iii. Environmental protections (fire/weather/power equipment/HVAC, etc.)

    g. Personnel security

        i. Background checks

        ii. Personnel termination/transfer relative to system access removal

    h. Patching and virus/malware protections

3. **Technical Controls**

    a. Access controls to systems/databases

        i. Session locks/timeouts

        ii. Strong password/pass phrase controls

        iii. Remote access and wireless

    b. Audit logging and retention

    c. Network/System controls

        i. Firewalls/intrusion detection services

        ii. Transmission protections (e.g., encrypted paths for sensitive information)

        iii. Protection of data in storage (e.g., encrypted database storage for sensitive information)

4. Privacy Controls:

    a. Institution of controls as defined in the Privacy Impact Assessment

        i. Data collection and use

        ii. Privacy policy and governance

iii. Minimization of sensitive information (e.g., personally identifiable information, or PII)

iv. Associated security protective controls

Cyber Security Assessment Summary and Ongoing Activities

The assessment results were reviewed and approved by the DL/ID Verification Systems Inc. (DIVS) in July 2015, and shared with the Federal Motor Carrier Safety Administration (FMCSA), an agency of the U.S. Department of Transportation, under strict non-disclosure due to the sensitivity of the assessment information. The assessment results demonstrated:

- No high risk findings

- A defined plan for remediation of medium/low findings

Following the assessment, AAMVA tracked the controls remediation and is managing the execution of the continuous monitoring plan.

The next full system risk assessment is scheduled for 2018.

**safe drivers
safe vehicles
secure identities
saving lives!**

SPEXS SECURITY OVERVIEW

OVERVIEW

The American Association of Motor Vehicle Administrators (AAMVA) is a tax-exempt, nonprofit organization developing model programs in motor vehicle administration, law enforcement, and highway safety. AAMVA is also the operator of a pointer index in accordance with the requirements of the State Pointer Exchange Services (SPEXS). SPEXS supports the functions of the State-to-State Verification Service, an electronic tool assisting States with the enforcement of their own laws regarding the issuance of driver's licenses and ID cards. SPEXS consists of a standardized information exchange protocol, a set of business rules, and a pointer index to identify which State has the authoritative record for an identity document.

The information in the pointer index is limited to what is directly relevant and necessary to accomplish its specified purposes, and includes Personally Identifiable Information (PII). Maintaining the confidentiality of the PII along with ensuring the integrity of the records, and the overall availability of the pointer index, are paramount to AAMVA.

DOCUMENT PURPOSE

This document highlights the safeguards that AAMVA takes to ensure the confidentiality, integrity, and availability of the SPEXS pointer index. This document avoids an in depth discussion of the security technologies, policies and procedures in place at AAMVA, but rather focuses on the security aspects that are most salient and pertinent to an external, non-technical audience.

SECURITY, PRIVACY AND COMPLIANCE

The sections that follow address various aspects related to the security, privacy and related compliance of SPEXS.

Information Security—AAMVA maintains written information security policies and procedures that align with applicable current publications from the U.S. National Institute of Standards and Technology (NIST)[1] and the Center for Internet Security[2]. Those policies cover all aspects of AAMVA operations, including physical, administrative and technological controls to protect the collection, maintenance, transmittal and disposal of SPEXS data.

Compliance—AAMVA follows the Risk Management Framework (RMF) developed by NIST[3] as directed per the Federal Information Security Management Act of 2002 and its amendment, The Federal Information Security Modernization Act of 2014[4]. The RMF is a structured security and privacy lifecycle methodology that

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[1] http://csrc.nist.gov/publications/PubsSPs.html
[2] https://www.cisecurity.org/cybersecurity-best-practices/
[3] http://csrc.nist.gov/groups/SMA/fisma/framework.html
[4] https://www.dhs.gov/fisma

leverages the various NIST security/privacy standards and guidelines. As prescribed in the methodology, AAMVA uses the services of a qualified independent organization to conduct full assessments of the pointer index, the environment and the operational processes. AAMVA conducts these assessments every three years, or sooner if a major change is undertaken. These assessments evaluate—(i) whether the system security plan properly addresses the NIST guidelines based on the categorization[5] of the system; and (ii), using appropriate procedures, the extent to which the security controls are implemented correctly, are operating as intended, and are producing the desired outcome with respect to meeting the security requirements for the system. In between each assessment, also in accordance with the RMF, AAMVA maintains ongoing security monitoring[6] to ensure key security controls continue to meet expectations. Furthermore, AAMVA protects PII in accordance with States' laws and regulations, including those pertaining to data breach notification.

Data Center Security—The pointer index is hosted in managed data centers by leading managed data center hosting providers. This ensures state-of-the-art solutions for all aspects of information technology, including server architecture, networking, and information security. Those providers maintain strong security controls, including physical controls, logical controls, and all the other essentials to reduce the risk of physical and technical attacks, and to ensure the utmost availability of the infrastructure. Those providers also maintain up-to-date recognized third-party certifications and attestations such as the SOC1[7], SOC2[8], SOC3[9] and ISO 27001[10].

Business Continuity—AAMVA maintains a replica of the pointer index that is geographically distant (more than 1,000 miles apart) to maximize business continuity in the event of a catastrophic outage, including complete loss at a data center. The replica is fully provisioned and is kept up to date with data replicated from the primary data center in real time. AAMVA maintains and periodically tests a business continuity plan designed to address numerous outage scenarios, from a single server loss to a major data center outage.

Encryption—AAMVA employs the powerful electronic data encryption technology Advanced Encryption Standard (AES)[11], which was established by NIST and is considered the standard encryption for the Federal government. AAMVA uses AES 256 to encrypt the pointer index. SPEXS data is transmitted over the AAMVAnet® network, a nationwide private network maintained by AAMVA, which also uses AES encryption. AAMVA manages and protects the encryption keys using a secure vault hosted on a completely separate network infrastructure.

Access Control—AAMVA maintains strong access controls throughout its infrastructure to ensure that there is no inappropriate or unauthorized access, or use, of the pointer index PII at any time. The SPEXS environments are segregated from other AAMVA networks and infrastructure.

Monitoring—AAMVA operates a comprehensive monitoring solution that allows consolidation and correlation of events, and takes into account known threat sources from industry recognized sources. In addition, the data center hosting providers also monitor the underlying infrastructure that AAMVA relies on, including intrusion detection and prevention systems. All monitoring systems include active notification and alert escalation.

Application Security—At least annually, AAMVA hires a qualified third party to conduct a penetration test of the SPEXS infrastructure, network, and applications. The tests are designed to detect any material security

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[5] The categorization is the outcome of an impact analysis to the system and the information it processes, stores and transmits. NIST recognizes three levels of categorization, High, Medium and Low. The SPEXS Pointer Index is categorized as Medium.
[6] http://nvlpubs.nist.gov/nistpubs/Legacy/SP/nistspecialpublication800-137.pdf
[7] https://www.ssae-16.com/soc-1/
[8] https://www.ssae-16.com/soc-2/
[9] https://www.ssae-16.com/soc-3/
[10] https://www.iso.org/isoiec-27001-information-security.html
[11] http://csrc.nist.gov/groups/ST/toolkit/block_ciphers.html

vulnerabilities. In addition, throughout the year, AAMVA conducts ongoing security vulnerability assessments to ensure that processes, such as security patching, are effective and timely.

Personnel Security—All AAMVA personnel (employees and contractors) are subject to a commercial background check. On an annual basis, all personnel receive security training and must enter into a legally binding security and confidentiality agreement that takes into consideration their access to AAMVA's sensitive information. Violation of the terms and conditions of the confidentiality agreement may lead to disciplinary action up to, and including, termination and/or civil and criminal prosecution, as appropriate.

Privacy—AAMVA adheres to all applicable privacy provisions of the Federal Privacy Act of 1974[12]. (Access or corrections to a SPEXS pointer upon an individual's request are addressed by the State that owns the record.) The privacy risks and protections of SPEXS are fully documented in the *SPEXS Privacy Impact Assessment*[13].

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[12] https://www.justice.gov/opcl/privacy-act-1974
[13] The SPEXS PIA is available upon request to AAMVA: privacy@aamva.org

AMERICAN ASSOCIATION OF MOTOR VEHICLE ADMINISTRATORS

SPEXS

STATE POINTER EXCHANGE SERVICES

PRIVACY IMPACT ASSESSMENT

6.0 | 2.0

System Release | Document Version

AAMVA

American Association of
Motor Vehicle Administrators

This document outlines the privacy impact assessment (PIA) for the State
Pointer Exchange Services (SPEXS).

The American Association of Motor Vehicle Administrators (AAMVA) is a nonprofit organization, representing the state and provincial officials in the United States and Canada who administer and enforce motor vehicle laws.

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The primary purpose of the State Pointer Exchange Services (SPEXS) is to provide information of use to state driver's license agencies in the issuance of driver's licenses. Participation in SPEXS is voluntary and is totally independent of a state's decision whether or not to seek compliance with the REAL ID Act. If a state chooses to pursue REAL ID compliance, SPEXS can be part of the state's overall compliance program. However, SPEXS is intended to be useful to any state, regardless of its decision to comply with REAL ID.

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CONTENTS

1   INTRODUCTION

1.1   ABSTRACT

The availability of information, including personal information, is made all the easier today due to advancements in information sharing technologies, storage, networks, and the creation of new information systems. The E-Government Act of 2002 mandates an assessment of the privacy impact of any substantially revised or new information system, thus recognizing that these advances have important ramifications for the protection of personal information contained in such systems. The document that results from these mandated assessments is called a Privacy Impact Assessment (PIA).

This PIA also addresses a requirement of the contract between the Mississippi Department of Public Safety and AAMVA, for the development and pilot operations of the State Pointer Exchange Services (SPEXS)[1] , as well as a requirement from the DIVS[2] (DL/ID Information Verification Systems) Privacy Policy for Vendors. The PIA is used to identify and mitigate privacy risks associated with the operation of the service.

1.2   OVERVIEW

The primary purpose of the State Pointer Exchange Services (SPEXS) is to provide information of use to State driver's license agencies (SDLAs) in the issuance of driver's licenses (DL) or ID cards. SPEXS fulfills all CDLIS (Commercial Driver's License Information System) requirements and supports the State-to-State Verification Service project within the DIVS initiative.

CDLIS was established under the Commercial Motor Vehicle Safety Act (CMVSA) of 1986[3] and is based on the Federal Motor Carrier Safety Regulations (FMCSRs) in 49 CFR 383 and 384. CDLIS is a nationwide capability allowing the SDLAs to comply with the Federal requirement that each commercial driver, as defined in the Federal regulations, has only one US-issued driver's license and one complete driver record.

DIVS is a not-for-profit corporation formed by the State of Mississippi to organize, implement, and coordinate electronic information exchange between the SDLAs for the purpose of detecting and deterring driver license and identification card applicant fraud. The function of S2S is to provide an electronic tool for States to use to enforce their own laws regarding the issuance of driver licenses and ID cards. Specifically, all US SDLAs have existing laws that state that a person is not allowed to have more than one current US-issued driver's license. Some States have laws that go even further in that they don't allow a person to have more than one credential (i.e. they can have either a driver's license or an ID card, but not both). S2S provides a means for States to determine whether or not a credential applicant already holds a driver's license or identification card and then take whatever action is called for based on State law.

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[1] Project Number 38394 – Software Development And Hosting Agreement Between the American Association of Motor Vehicle Administrators and the Mississippi Department of Information Technology Services as Contracting Agent for the Mississippi Department of Public Safety.

[2] DIVS is a not-for-profit corporation formed by the State of Mississippi to organize, implement, and coordinate the electronic information exchange between the SDLA for the purpose of verifying identification information provided by driver license and identification card applicants. The organizing Board of Directors of DIVS is comprised of representatives from the States of Mississippi, Indiana, Florida, Kentucky and Nevada.

[3] http://www.fmcsa.dot.gov/registration-licensing/cdl/cdl.htm

SPEXS also supports the requirements of the REAL ID Act; however, participation in SPEXS is voluntary and is totally independent of a State's decision whether or not to seek compliance with the REAL ID Act. SPEXS is intended to be useful to any State, regardless of its decision to comply with REAL ID.

SPEXS is comprised of the followings:

- A set of specifications and procedures that govern the information exchange between participating organizations
- Standardized system interfaces supporting the communications between those organizations' systems
- The SDLA systems that hold detailed applicant information
- A pointer index operated by AAMVA, which identifies which State has the authoritative record for a credential holder (this State is also referred to as the State of Record or SOR).

For the purpose of this document, the scope is limited to the SPEXS pointer index.

2   CHARACTERIZATION OF THE INFORMATION

The following sub-sections are intended to provide answers to questions that define the scope of the information within the pointer index.

2.1   TYPES OF INFORMATION

The information in the pointer index is limited to what is directly relevant and necessary to accomplish its specified purpose(s) and consists of:

For all drivers that have a pointer within the index:

- Driver information such as the name(s), including former name(s), date of birth, gender and a portion of the social security number
- Credential information, including type of credential issued, credential number (e.g. driver license number), including past credential numbers

For only commercial drivers, as defined by Federal regulation:

- Full social security number

The system also stores meta-data information, such as date/time when a pointer is added or updated.

2.2   SOURCES OF INFORMATION

What are the sources of information in the system?

All PII comes from participating SDLAs'. The applicant provides the information to the SDLA when they apply for a credential.

Meta-data is generated by the SPEXS software.

SPEX does not require that any information be collected by the States beyond that which States already collect.

2.3   PURPOSE OF INFORMATION

Why is the information being collected, used, and disseminated?

The information is collected, used and disseminated in order to improve highway safety, homeland security, and identity security by:

- Detecting and deterring driver license and ID card fraud,
- Preventing a person from spreading driving convictions over multiple driving records,
- Inhibiting identity theft
- Inhibiting government benefits fraud

All States must address the following laws and regulations:

- Every State has laws that make it a crime for an individual to possess more than one US-issued driver's license

- Every State has laws that make it a crime to falsify information provided on an application for a driver's license or ID card

- All States must comply with the Commercial Motor Vehicle Safety Act (CMVSA) of 1986 and its subsequent laws and regulations

Some States have laws that make it a crime for an individual to possess more than one US-issued credential (i.e. they can possess a driver's license or and ID card, but not both).

In addition, States that choose to be REAL-ID compliant also must adhere to the Real ID Act of 2005 and its subsequent regulations.

The requirements that are the subject of this PIA come from two sources:

- The requirements documented by DIVS for the S2S project, that were given to AAMVA under the Mississippi contract, which address existing State law and REAL ID requirements, and

- Federal CDL legislation and regulation.

2.4   COLLECTING INFORMATION

How is information collected?

AAMVA does not collect any information from an individual.

The applicant applying for a credential, such as a driver's license, a commercial driver's license or an ID card, provides information to the SDLA.

S2S does not require that any information be collected by the States beyond that which States already collect as required by their state laws and regulations.

Collection of data related to S2S is determined by State law and regulation.

Collection of data related to CDLIS is determined by a combination of State and federal law and regulation.

The SDLA contributes the necessary applicant information to the pointer index through a combination of real-time information exchange (referred to as online transactions) and asynchronous batch processes (referred to as batch transactions).

2.5   ACCURACY OF INFORMATION

How is the information checked for accuracy?

The accuracy of the PII is the responsibility of the State that contributed the pointer. Each State has their own methods for checking the accuracy of the information.

In addition, each State conducts a Master Pointer Record (MPR) Data Quality Validation and Verification process, for pointers associated with commercial drivers, at least once a year. This process compares the State information stored in the pointer index with that of the SDLA database, and reports on any inaccuracies. Discrepancies are tracked through to resolution. The FMCSA monitors resolution of such discrepancies for all commercial records.

A similar process has been developed for non-commercial driver pointers. DIVS and AAMVA will be working with each S2S participant to develop a schedule and resolve any information discrepancies that are identified.

2.6   LEGAL AUTHORITY TO COLLECT INFORMATION

What specific legal authorities, arrangements, and/or agreements define the collection of information?

States have the authority to collect this information based on their individual State laws and regulations.

AAMVA is authorized to house this information based on:

- Individual User Agreements between AAMVA and the State pilot participants, related to operating S2S

- An agreement between FMCSA and AAMVA related to operating CDLIS, called the "CDLIS Cooperative Agreement between FMCSA and AAMVA – June 9, 2008"

- A contract between Mississippi and AAMVA related to non-CDL drivers and ID card holders

2.7   IDENTIFIED PRIVACY RISKS AND MITIGATIONS

Given the amount and type of data collected, what are the identified privacy risks and how are they mitigated?

Because the SPEXS pointer index contains PII, there are privacy risks that must be addressed. Access to the pointer index must be restricted to authorized users and any potential unauthorized access or misuse of the information must be detected and addressed.

It is important to understand the environment so that the assignment of privacy mitigation responsibilities can be understood. When the S2S project began, the first order of business was to determine the best design for the service. Therefore, prior to developing the pointer index, AAMVA through the State of Kentucky and in collaboration with 19 other States[4], conducted a thorough analysis of various design models for S2S, ranging from a completely distributed solution across all the States, to one that would consist of having a large central database containing all the driver detail records. Privacy was one of the significant design criteria concerns. The conclusion[5] was that a pointer index that contains the minimum amount of information necessary to locate the detail records stored within a State offered the best design, including the best privacy protection advantages. This design limits the potential exposure of PII while at the same time provides States with an effective, affordable service to detect and deter fraud.

Because of the design of S2S, States have a significant responsibility to address privacy risks since the detail regarding the individual is stored there. Each State has processes and procedures in place that address these concerns as they are already sharing similar information as part of CDLIS. The User Agreement that is signed by a State when it begins participation describes these responsibilities as they relate to S2S.

The privacy risks with the SPEXS pointer index are addressed through the following controls:

- Formally defined roles and obligations of each participating organization
- Assignment of oversight and compliance monitoring functions

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[4] California, Florida, Georgia, Idaho, Indiana, Iowa, Kentucky, Maryland, Massachusetts, Missouri, Montana, Nevada, New Jersey, North Carolina, South Carolina, South Dakota, Texas, Washington, Wisconsin

[5] REAL ID State-to-State Verification Design Alternatives Analysis; November 2008

2 Characterization of the Information   5

- Reducing the data elements maintained to the absolute minimum required to achieve the SPEXS purpose(s)
- Operating the pointer index in compliance with the Federal Information System Management Act (FISMA), and the security & privacy controls defined by the National Institute of Standards and Technology, including, but not limited to:
    - Implementing strong access controls to ensure that only authorized users/systems can contribute, access and update the information
    - Implementing the necessary audit trails to track changes to the information records
    - Implementing data quality checks and processes to periodically verify the quality and integrity of the information
    - Implementing a comprehensive backup strategy
    - Instituting a security incident response plan, including steps for handling and notification related to a breach of PII
    - For AAMVA employees and contractors, penalties for misuse of PII could include disciplinary action up to and including termination of employment or contract and/or civil and criminal prosecution, as appropriate.

3   INFORMATION USAGE

The following sub-sections are intended to clearly delineate the use of information and the accuracy of the data being used.

3.1   DESCRIPTION OF INFORMATION USAGE

How is the information used?

The information is used by the SDLAs to comply with the purposes specified in 2.3 Purpose of Information. Jurisdictions that do not participate in S2S only have access to CDLIS data.

Only SDLAs participating in S2S have access to non-commercial pointers. All SDLA's have access to pointers related to CDL holders. Access to SPEXS is limited to the purpose of processing an application for a State credential, except as shown below regarding the CDL portion of SPEX.

In accordance with Federal transportation regulations, and in support of the U.S. Department of Transportation's objective to make America's roads safer, access to CDL information in SPEXS is provided to support the following tasks related to commercial drivers:

- Federal Motor Carrier Safety Administration (FMCSA) for the monitoring of and overall compliance with the commercial driver's license CDL program

- Interprovincial reciprocal information exchange between the U.S. and Canada related to the operation of U.S. commercial drivers in Canada

- Law enforcement access, in relation to public safety operations, such as roadside inspections of commercial drivers

- Independent, private sector organizations providing background check services that include verification of a commercial driver status and history prior to, and during employment, subject to the driver's consent

Information system controls are used to prevent the above entities from accessing data that is not part of the CDL Program.

As the pointer index operator, AAMVA maintains agreements and detailed specifications and procedures for each type of allowable access to SPEXS.

Finally, authorized personnel from AAMVA may also use the information in SPEXS to provide support to the SDLA and the aforementioned organizations in accordance with defined policies and procedures.

3.2   ANALYSIS OF INFORMATION

What types of tools are used to analyze data and what type of data may be produced?

Data analysis is limited, and achieved through the use of reports or batch processes.

All data analysis is geared toward ensuring compliance with the system specifications and any associated regulations. The reporting feature enables authorized users to query and extract a predefined set of information from the pointer index, with data formatted into a report style meaningful to the requestor. The batch pro-

cesses are automated; the processes used to initiate a batch process and the data it produces are strictly con-
trolled by the pointer index. The system also ensures that only the data relevant to, and authorized for, a par-
ticular user, SDLA, or inquirer is accessed or shared.

3.3   USE OF COMMERCIAL OR PUBLICLY-AVAILABLE DATA

**Does the system use any commercial or publicly-available information or data? If so, explain why and
how it is used.**

The SPEXS pointer index does not rely on commercial or publicly available data in any way. The only sources
of PII within SPEX are the SDLAs.

3.4   CONTROLS TO ENSURE PROPER INFORMATION HANDLING

**Are there any controls in place to ensure that information is handled in accordance with the above
described uses?**

Each of the SPEXS participating organizations recognize the importance of, and advocate for, strong security
and privacy controls. The oversight bodies, represented by the DIVS, AAMVA and FMCSA, play an essential
role in specifying the minimum security and privacy requirements, and for monitoring ongoing compliance.

Proper information handling is addressed through the following controls:

- Formally defined the roles and obligations of each participating organization
- Assigned oversight and compliance monitoring functions
- Tightly control the organizations having access to the information to ensure it complies with the reg-
  ulations and requirements for which SPEXS was instituted
- Operate the pointer index in compliance with the Federal Information System Management Act
  (FISMA), and the security & privacy controls defined by the National Institute of Standards and Tech-
  nology, including, but not limited to:
    - Implement strong access controls to ensure that only authorized users/systems can contrib-
      ute, access and update the information
    - Implement the necessary audit trails to track changes to the information records
    - For AAMVA employees and contractors, penalties for misuse of PII could include disciplinary
      action up to and including termination of employment or contract and/or civil and criminal
      prosecution, as appropriate.

4   INFORMATION RETENTION

The following sub-sections are intended to describe how long information will be retained after the initial collection.

4.1   RETAINED INFORMATION

What information is retained?

The SPEXS pointer index retains the information defined in the section 2.1 – Type of Information, as well as the audit trails associated with the addition, change or deletion of records.

The SPEXS information exchanged between two participating organizations is not retained, other than the meta-data supporting the exchange (i.e. origin, destination, date and time and type of the request etc.).

4.2   LENGTH OF RETENTION

How long is the information retained?

The regulations governing commercial driver's license (CDL) issuance specify how long a record and its history must be maintained before they can be deleted. This includes the retention periods for CDL convictions and withdrawals in accordance with the Non-Resident Violators Compact and Federal Regulations (49 CFR §384.231(d)). Therefore the retention of a CDLIS pointer is governed by these regulations. Essentially a CDLIS pointer may be deleted once the retention period has been satisfied based on the Federal regulations.

For other types of records, the States follow the SPEXS system requirements, which stipulate that the pointers must be deleted when the State deletes the associated record within their system.

4.3   RETENTION SCHEDULE APPROVAL

Has the retention schedule been approved?

The retention schedule for commercial pointers is defined and approved by Federal regulations.

The retention schedule for other pointers is referenced in 4.2 above and is based on State retention requirements.

A formal record retention schedule is maintained for system artifacts other than the pointers, such as reports, batch files etc. The schedule was reviewed and approved by the participating organizations and AAMVA's privacy officer.

4.4   INFORMATION RETENTION RISKS

What risks are associated with the length of time information is retained and how are those risks mitigated?

AAMVA minimized the data retained to what is necessary to ensure full compliance with the requirements, and to support the required ongoing compliance oversight. The risks are mitigated by:

- Development of a formal record retention schedule addressing all types of pointers

- Formally reviewing and approving the retention schedule

- Instituting periodic verification and validations to ensure record deletions occur in accordance with the retention schedule

- Implementing strong access controls to the stored data

- Encrypting all sensitive information, including PII data in the data store and in the backups

- Implementing a strong backup and disaster recovery strategy

5   INTERNAL SHARING AND DISCLOSURE

The following sub-sections are intended to define the scope of information sharing internally within AAMVA.

5.1   SHARING INFORMATION INTERNALLY

What information is shared internally and for what purpose?

Specific SPEXS pointer index information may be shared internally, within AAMVA, with the authorized personnel, in order to provide help-desk support to those using the SPEXS online and batch transactions. The information shared internally may consist of aggregate, non-identifiable dataset, or detailed record(s) based on the nature of the support requested.

5.2   AUTHORIZATION FOR INTERNAL SHARING

Is the sharing of PII inside AAMVA compatible with the original collection and purpose?

The internal sharing of information is compatible with the purpose for which it was collected. The internal information sharing at AAMVA is subject to AAMVA's privacy policy and conducted in accordance to well defined internal procedures. The procedures are updated, approved and communicated at least once a year.

5.3   SECURITY CONTROLS FOR INTERNAL SHARING AND TRANSMISSION

How is the information shared inside AAMVA and what security measures safeguard its transmission?

The information shared within AAMVA is encrypted while in transport or in storage.

5.4   PRIVACY RISK AND MITIGATION FOR INTERNAL SHARING

What is the privacy risk associated with internal sharing of information and how is the risk mitigated?

The risk of unauthorized disclosure associated with the internal sharing of information is mitigated by:

- Ensuring that all AAMVA personnel receive annual privacy awareness training
- Ensuring that AAMVA maintains a formal Privacy Policy
- Documenting and communicating the standards and procedures by which information can be shared; ensuring that such standards and procedures are reviewed and formally approved and that AAMVA personnel training occurs at least once a year.
- Ensuring that AAMVA personnel signs, on an annual basis, a Security and Confidentiality Agreement that denotes their responsibilities related to the protection of PII and the penalties for un-authorized use, which may include disciplinary action up to, and including, termination of employment or contract, and/or civil and criminal prosecution, as appropriate
- Develop and implement an incident response procedure with specific steps for the handling of a PII breach; including the breach notification requirements

6 EXTERNAL SHARING AND DISCLOSURE

The following sub-sections are intended to define the scope of information sharing outside of AAMVA.

6.1 SHARING INFORMATION EXTERNALLY

With which external organization(s) is the information shared?

Subject to the provision of the Privacy Act of 1974, the Driver Privacy Protection Act (DPPA), and specific State regulations, the SPEXS pointer index information is shared with the participating organizations described in 3.1 Description of Information Usage.

6.2 AUTHORIZATION FOR EXTERNAL SHARING

Is the sharing of personally identifiable information (PII) outside AAMVA compatible with the original collection? What legal mechanism allows the program or system to externally share the PII outside of AAMVA?

The external sharing of information is compatible with the purpose for which it was collected and necessary to address the State and Federal rules and regulations. The legal authority allowing for the sharing of PII is stated in 2.6 Legal Authority to Collect Information.

6.3 SECURITY CONTROLS FOR EXTERNAL SHARING

How is the information shared outside the system and what security measures safeguard its transmission?

To mitigate the risk associated with sharing PII externally, AAMVA implemented the following controls:

- Formally defined the roles and obligations of each participating organization
- Assigned oversight and compliance monitoring functions
- Defined and implemented communication standards and specifications
- Encrypted any PII while in transit using technologies that conform to the standards set by the National Institute of Standards and Technology, including the Federal Information Processing Standards.

6.4 PRIVACY RISK AND MITIGATION FOR EXTERNAL SHARING

What is the privacy risk associated with external sharing of information and how are they mitigated?

External sharing of information increases the risks of unauthorized disclosure and misuse. These risks are mitigated by:

- Developing a privacy framework that clearly states all the intended uses of the information, and specifies each user's and organization's responsibility in ensuring that the privacy of the information is maintained

- Communicating to the users their security and privacy obligations through formal contract or agreement, specifically for, or with explicit reference to, the information system

- Instituting penalties for the users that do not conform with the privacy protection requirements

- Maintaining a governance structure to review, approve and provide oversight over the purpose and participants of the program

- Ensuring that all sharing of information complies with the Driver Privacy Protection Act

- Restricting access to the information to those with a need to know

- Providing a point of contact for any privacy issues or breach

- Developing a comprehensive incident response plan with specific steps for the handling of a PII breach; including the breach notification requirements

7 NOTICE

The following sub-sections are intended to define the notice to the individual on the scope of information collected, the right to consent to usage of their information, and the right to decline to provide information.

7.1 PROVIDING NOTICE

Was notice provided to the individual prior to collection of information?

The participating States have the responsibility to provide notice to the applicant regarding the accuracy of the information the applicant is providing and the State's intent to detect and deter fraud related to the application for a credential.

7.2 USER RIGHT TO DECLINE

Do individuals have the opportunity and/or right to decline to provide information?

Existing State laws and regulations require the information to be collected in order to obtain a credential. The applicant's refusal to provide the necessary information would result in the State's inability to issue a credential.

7.3 USER RIGHT TO CONSENT TO USE

Do individuals have the right to consent to particular uses of the information? If so, how does the individual exercise that right?

The DPPA, along with other State-based legislation, primarily determine the use of information collected by SDLA's. Use of this information within SPEXS conforms to these laws.

7.4 PRIVACY RISK AND MITIGATION

Considering the notice, consent, and opportunities to decline to provide information, what are the identified privacy risks and how are they mitigated?

There is no confusion that the information provided by an applicant seeking a credential, such as a driver's license or an ID card, will be used for the purpose of issuing such credentials. There is also no confusion that this information may be verified later for the purposes outlined in the Driver Privacy Protection Act.

8 ACCESS, REDRESS AND CORRECTION

The following sub-sections are intended to define an individual's ability to ensure the accuracy of the information collected about them.

8.1 INDIVIDUAL ACCESS

What are the procedures that allow individuals to gain access to their information?

The SDLAs are the formal record holders of the information maintained in the SPEXS pointer index. The information in the SPEXS pointer index is a limited subset of the information in the SDLA database. AAMVA asserts no ownership of the information and cannot provide individuals direct access to their records.

An individual may request access to his or her information by contacting the SDLA that issued the credential they applied for. The SDLA may issue an inquiry to the SPEXS pointer index for the purpose of verifying that the information in the pointer index matches that in its own database.

SDLAs are public agencies and their contact information is readily available.

8.2 CORRECTION OF INFORMATION

What are the procedures for correcting inaccurate or erroneous information?

If an individual believes the information in the SPEXS pointer index is inaccurate, the individual is required to contact the SDLA that issued the credential associated with the pointer. Upon adjudication of the mistake, if necessary, the SDLA will issue an *Update* transaction to the SPEXS pointer index to update/correct the information.

8.3 NOTIFICATION OF PROCEDURES TO CORRECT INFORMATION

How are individuals notified of the procedures for correcting their information?

Individuals contacting AAMVA directly with requests to correct their personal information in the SPEXS pointer index will be directed to the SDLA that issued the credential in question.

Specific SDLA procedures supporting data correction are out of scope for this document and vary from State to State.

8.4 ALTERNATIVES TO FORMAL REDRESS

If no formal redress is provided, what alternatives are available to the individual?

If an individual is unable to resolve a data correction problem with the respective SDLA, he or she is encouraged to file a complaint with AAMVA's Privacy Officer by emailing Privacy@aamva.org or calling 703 522 4200.

8.5 PRIVACY RISK AND MITIGATION

What are the privacy risks associated with the redress available to individuals and how are those risks mitigated?

The main privacy risk associated with the SPEXS pointer index redress process relates to the fact that individuals may attempt to contact AAMVA instead of the SDLA that issued their credentials. The risk is mitigated by having well defined procedures allowing the AAMVA personnel to handle such requests in a very efficient manner, and by maintaining the contact list of all SDLAs, including the official Website or 800 number.

9 TECHNICAL ACCESS AND SECURITY

The following sub-sections are intended to describe technical safeguards and security measures.

9.1 PROCEDURES FOR SYSTEM ACCESS

What procedures are in place to determine which users may access the system? Are these procedures documented?

Access to the SPEXS pointer index information is provided to:

- **Authorized Jurisdiction Personnel** through their own SDLA system or through reports received from the pointer index, in accordance to each Jurisdiction acceptable use policy and, for the SPEXS participants, the requirements defined in the *DIVS Program – Pilot State to State Verification Service – Pilot Participant User Agreement.*

- **AAMVA SPEXS Support Personnel** including infrastructure, software, and Help Desk support. Access to computing support equipment (e.g., servers, databases) for infrastructure and application support is provisioned via the AAMVA Access Request System and must be approved by a designated SPEXS support manager. Access to AAMVA Help Desk support is limited to the internal (i.e., not Internet accessible) support web user interface and also managed through the AAMVA Access Request System.

- **Managed Data Center Support Personnel,** including facilities and operational support of the network and computing equipment and the associated operating systems. AAMVA infrastructure oversees the service provider's operational support and approves any changes including firewall policies, patching cycles, the commissioning / decommissioning of equipment.

9.2 CONTRACTOR ACCESS

Will contractors have access to the system?

In the capacity of acting as staff augmentation, contractors providing support services will have access to SPEXS as described in 9.1 Procedures for System Access.

As part of the managed services agreement with the data center managed service provider, system-level access is in place and is required by data center support in the capacity of providing operational services such as backups, patching, and general maintenance.

9.3 PRIVACY TRAINING

What privacy training is provided to users either generally or specifically relevant to the program or system?

As part of the AAMVA Security and Privacy program, all AAMVA staff, including staff equivalent contractors, are required to complete security and privacy training during the personnel on-boarding process, and annually thereafter. The training covers security and privacy matters.

9.4   SECURITY ASSESSMENT AND SYSTEM AUTHORIZATION

Has a formal security assessment and system authorization been completed for the system or systems supporting the program?

A formal security and privacy assessment leveraging the FISMA risk management framework was conducted in July 2015, prior to the launch of the SPEXS pointer index. Among others, the risk management framework complies with the NIST Security Special Publications and FIPS documentation, including:

- *NIST SP 800-53 Rev. 4 Security and Privacy Controls for Federal Information Systems and Organizations*

- *NIST SP 800-37 Rev. 1 Guide for Applying the Risk Management Framework to Federal Information Systems: A Security Life Cycle Approach*

- *FIPS 199, Standards for Security Categorization of Federal Information and Information Systems*

- *FIPS 200, Minimum Security Requirements for Federal Information and Information Systems*

In alignment with *NIST SP 800-37*, the risk management framework includes an analysis of the system impact level ("categorization") which provides for the level of security and privacy controls. The risk management framework also includes a formal system security package, which is comprised of a security and privacy plan, privacy impact assessment, contingency plan, and a risk assessment report. For security reasons, the security package documentation is confidential.

10 TECHNOLOGY

The following sub-sections are intended to critically analyze the selection process for any technologies utilized by the system, including system hardware, software, and other technology.

10.1 PROJECT TYPE

What type of project is the program or system?

This project is described in Section 2.3 Purpose of Information.

10.2 SYSTEM DEVELOPMENT STAGE

What stage of development is the system in and what project development lifecycle was used?

SPEXS is currently in the production pilot stage. All 51 U.S. jurisdictions use SPEXS for their CDLIS participation. A select few Jurisdictions have implemented, or are in the process of implementing, their access to the S2S capabilities.

10.3 TECHNOLOGY PRIVACY CONCERNS

Does the project employ technology which may raise privacy concerns and, if so, what are the implications for implementation?

The SPEXS pointer index does not employ technology that will raise additional privacy concerns. SPEXS provides some services via an Internet-accessible interface. Protective measures have be included in the security plan to define the appropriate levels of protections, commensurate with the additional level of risk, for authentication and authorization mechanisms, firewall protections, intrusion monitoring, proactive penetration testing, and the security of sensitive information as it is transmitted across the Internet.

GLOSSARY OF ACRONYMS

AAMVA	American Association of Motor Vehicle Administrators
CDL	commercial driver's license
CDLIS	Commercial Driver's License Information System
CMVSA	Commercial Motor Vehicle Safety Act
DLN	driver license number
DIVS	DL/ID Verification Systems (DIVS)
FIPS	Federal Information Processing Standards
FISMA	Federal Information Security Management Act
FMCSA	Federal Motor Carrier Safety Administration
MCSIA	Motor Carrier Safety Improvement Act
MPR	master pointer record
NIST	National Institute of Standards and Technology
PIA	privacy impact assessment
PII	personally identifiable information
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act – a Legacy for Users
SOR	State of record
SPEXS	State Pointer Exchanger Services
SSN	social security number