



Memorandum

To: Representative Neil Foster
Co-Chair, House Finance Committee
Alaska Legislature

From: Leslie Ridle
Deputy Commissioner

Date: April 25, 2017

Subject: **Response to questions on HB 74 REAL ID**

1. How long has Alaska been involved with AAMVA?

Response: The American Association of Motor Vehicle Administrators (AAMVA) was founded in 1933. Alaska has been a member for over 25 years.

2. How long has Alaska been providing 5 digits of applicant's SS number to AAMVA?

Response: State to State (S2S) was developed under a grant from the US Department of Homeland Security (DHS) given to the Mississippi Department of Public Safety (MSDPS). Alaska was selected for the pilot in December 2015 and went live in January of 2017 as the 14th pilot state. The pilot program waived the standard fees that range from \$80K to \$116K for implementation and paid for the first partial year of service for Alaska. MSDPS formed the DL/ID Verification Systems (DIVS) organization with a dozen other states to provide input and guidance to Mississippi for the development and operation of the S2S Pilot, among other things. Mississippi contracted with Clerus Solutions to help create the S2S system. The pilot program ended on 3/1/2017 and the operation of the system was turned over to AAMVA and the states that Govern AAMVA, including Alaska.

- S2S was developed by the states for the states
- States own all data that is verified through S2S
- States did not have to collect any new data from citizens to participate in S2S
- The states own and operate S2S, through their association AAMVA (since March 1, 2017)
- No federal agency has access to S2S

3. How long has the SPEXS database been around and how does SPEXS differ from the prior system?

Response: DMV currently utilizes AAMVA's verification systems to comply with federal and state law requiring DMV to protect against issuing duplicate or fraudulent licenses or IDs. SPEXS is based on the CDLIS Database that was used for CDL (Commercial Driver License) records, making sure that only one CDL license is issued at a time. This system has been in place for decades. SPEXS/CDLIS and PDPS have been in place since the 1980's.

- **SOLVE:** Verifies that the social security number that is presented is active and correct for that person. All states use this system.
- **PDPS** (Problem Driver Pointer System): Looks for license withdrawals (suspensions, revocations, etc.) in other states. PDPS will also show DMV if a withdrawal has recently been resolved. If a person has never had any issues or the issues have long since been resolved, DMV gets a “no record on file” response and proceeds with issuance.
- **CDLIS** (Commercial Driver’s License Information System): DMV checks all drivers, including non-CDL holders, because lifetime CDL disqualifications limit those drivers to ID only. Required by federal law since 1987 for CDL holders (49 CFR parts 383 and 384).

Although PDPS and CDLIS assist jurisdictions in upholding the “one driver, one license” law, they are separate systems that check for separate things, leaving gaps in information exchange and verification. Notification between states of license transfer is often not real time. Some notifications are sent manually, some in electronic batches, but it all occurs after the fact.

- Under SPEXS/CDLIS: DMV jurisdictions were dependent on applicant disclosure and surrender of any previous licenses and proper data entry by DMV staff. DMV ability to confirm a license in another state was limited to problem drivers or holders of CDLs. These are being worked by hand to fix.
- Under S2S: S2S incorporates CDLIS with non-commercial driver information to ensure both commercial and non-commercial drivers maintain one driver’s license and one complete driving record. This resolves the gaps and issues noted above. When Alaska DMV entered the S2S system, DMV immediately discovered 3200 duplicate license holders.

4. What documents are provided to AAMVA for the SPEXS database?

Response: Data stored centrally by AAMVA consists of what are called “Pointer Records.” These records contain the minimum amount of Personal Identifying Information (PII) necessary to identify records *maintained in Jurisdiction databases* and information to indicate where the full records are stored .

Pointer records are: full legal name, DOB, and partial social security number.

5. Does the Federal government have the ability to change required documentation when they choose?

Response: PL 109-13 Division B (REAL ID Act of 2005) requires states to work together to ensure access of data to verify identity. The Act does not specify how this is done. CFR Part 37 further addresses the issue of multi-state verification systems. DHS has stipulated the S2S system developed by the states through AAMVA will meet the requirements of the Act and corresponding regulations.

6. Are the contracts Alaska has entered into with AAMVA available for legislative review?

Response: The S2S Verification Service Agreement between Alaska DMV and AAMVA is attached.