



American Association of
Motor Vehicle Administrators


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

Employer Notification System Design & Best Practices Recommendations


Release 1.0.2

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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Executive Summary

Under the Commercial Motor Vehicle Safety Act of 1986 (CMVSA), within 30 days of a conviction for any traffic violation (except parking), a commercial vehicle operator must notify their employer, regardless of the nature of the violation or the type of vehicle which was driven at the time. If an operator's commercial driver's license (CDL) is suspended, revoked, canceled, or if they are disqualified from driving, the driver must notify their employer within one business day following notice. Employers may not knowingly use a driver whose license is suspended. Violation of this requirement may result in civil or criminal penalties.

However, under current regulatory requirements, motor carriers have the burden for discovering driver history and are required to check the driving history record of their drivers annually. As a result, if a driver does not self-report, it could be up to 364 days before a motor carrier obtains this information. In the interim, the driver may have been operating illegally on the roadways. This represents a significant potential highway safety risk, since across all vehicle types, suspended drivers have a crash rate that is 14 times higher than other drivers.¹

Absent a system to facilitate real-time, automatic notification of commercial driver violations (or change in license status) to employers, the current requirement of self-reporting by drivers and annual checks by motor carriers results in a safety vulnerability. This vulnerability allows unqualified drivers (i.e., loss of driving privileges following certain convictions for traffic offenses) to operate on the roadways without the motor carrier's knowledge. Prior research estimated that only 50 to 80 percent of commercial drivers actually self-report.²

The purpose of an Employer Notification System (ENS) is to facilitate a real-time automatic notification to motor carriers on triggering events such as a change in the status of an employee's driver license due to a conviction for a moving violation, failure to appear, crash, driver license suspension or revocation. It would also notify the employer of any other action taken against a driver's driving privileges.

In 2007, a pilot ENS program was conducted to assess the feasibility, costs, safety impacts, and benefits of such a system; and to assess methods for efficient exchange of driver safety data from existing State systems. The pilot program, tested in Colorado and Minnesota, allowed motor carriers to register, with the driver's expressed permission, to receive timely electronic notifications of convictions and suspensions. The results of the pilot indicated that a nationwide ENS was needed and could have significant safety and monetary benefits for motor carriers.

Congress supported FMCSA's efforts to establish an employer notification system for commercial vehicle drivers by establishing section 32303 of the Moving Ahead for Progress in the 21st Century Act (MAP-21). This section would permit employers to satisfy the requirement to check their drivers' histories annually by "receiving occurrence-based reports of changes in the status

¹ National Driver Record Notification System Report To Congress, Federal Motor Carrier Safety Administration, September 2015

² Final Report – Driver Violation Notification Service Feasibility Study, SAIC, American Transportation Research Institute (ATRI), American Association of Motor Vehicle Administration (AAMVA), Commercial Vehicle Safety Alliance (CVSA), November 1, 2004

of a driver’s record from one or more driver record notification systems that meet minimum standards issued by the Secretary.” Through MAP-21, Congress further supported the Secretary’s plans to develop and implement a national driver record notification system for commercial vehicle operators.

In an effort to advance this initiative and identify the States already operating ENS programs, FMCSA provided grant funding to the American Association of Motor Vehicle Administrators (AAMVA). The grant supported the creation of a working group of jurisdictional personnel who discussed the ENS issue and provided input to FMCSA on common ENS protocols and best practices.

Most recently, the FMCSA provided direction to AAMVA to build upon the ENS Working Group discussions to develop a recommendation or “Best Practices” Report to describe and diagram a national ENS that could be effectively and efficiently implemented. AAMVA developed a range of ENS solutions and provided them to the Commercial Driver License Information System (CDLIS) Working Group which considered the following options:

- **Solution 1**—Each jurisdiction builds its own ENS using common standards.
- **Solution 2**—Build a national ENS that jurisdictions can participate in.
 - **Option 1**—Build a national ENS independent of CDLIS.
 - **Option 2**—Build a national ENS leveraging the AAMVAnet network and CDLIS.

The CDLIS Working Group discussed and analyzed the various options and recommended that if a national ENS system were to be developed it should be implemented using the existing AAMVAnet network and CDLIS.

The purpose of this report is to present the pros and cons of the various ENS solutions and propose a fee model to be used for the implementation of a national ENS using AAMVAnet and CDLIS.

1 Background

1.1 Commercial Vehicle Industry Size

In 2015, the FMCSA reported 551,150 interstate motor carriers and intrastate Hazardous Materials motor carriers operating in the U.S.³ These companies employ approximately four million CDL holders. These estimates include bus/transportation companies. The American Bus Association estimates that there are about 3,330 motor coach carriers in the U.S. and the National Association of State Directors of Pupil Transportation Services estimates that there are 14,000 public school districts in the U.S. Combined, the motor coach and school bus industries are estimated to employ 665,000 bus drivers.

According to the same FMCSA report, owner-operators represent about half of all active motor carriers. Owner-Operators own and operate their own trucking business and may lease on to a carrier or they may operate under their own authority.

1.2 Overview of ENS

Under §383.51 of the Federal Motor Carrier Safety Regulations, within 30 days of a conviction for any traffic violation (except parking), a commercial vehicle driver must notify their employer of the conviction, regardless of the nature of the violation or the type of vehicle which was driven at the time. If a driver's commercial driver's license (CDL) is suspended, revoked, canceled, or if he or she is disqualified from driving, the driver must notify his or her employer accordingly within one business day following notice of the action against their CDL. Motor carrier employers may not knowingly use a driver whose license is suspended or revoked. Violation of this requirement may result in civil or criminal penalties against the employer.

Under current regulatory requirements, employers are required to check the driving history record of their employees annually and have the burden of proof for discovering driver violations. As a result, if a driver does not self-report, it could be up to 364 days before a motor carrier obtains this information. In the interim, a driver may be illegally operating on a suspended license. This represents a significant potential highway safety risk, since across all vehicle types, suspended drivers have a crash rate that is 14 times higher than other drivers.

Absent a system to facilitate the real-time, automatic notification of commercial driver violations (or change in license status) to employers, the current requirement of self-reporting by drivers and annual checks by motor carriers results in a safety vulnerability. This vulnerability may allow suspended or revoked drivers (i.e., loss of driving privileges following certain convictions for traffic offenses) to operate on the roadways longer without the motor carrier's knowledge.

³ FMCSA 2016 Pocket Guide to Large Truck and Bus Statistics:
<https://www.fmcsa.dot.gov/safety/data-and-statistics/commercial-motor-vehicle-facts>

1.3 Benefits of Using ENS

Under the most robust models, an ENS enables employers to receive notifications about changes in a driver's status. In addition, it enables employers to be notified when adverse information is added to a driver's record. This allows employers to take appropriate action as soon as the driver has been convicted of a moving violation. In particular, it gives employers essential information to prevent a suspended or revoked driver from getting behind the wheel. Keeping suspended drivers off the roads increases highway safety.

1.4 Prior ENS efforts

In response to requirements established in the Transportation Equity Act for the 21st Century (TEA-21) enacted on July 22, 1998, the FMCSA conducted a Driver Violation Notification Service Feasibility Study (DVN Feasibility Study). The purpose of the study was to determine if developing a nationwide employer notification service was technically feasible, and if it would generate sufficient safety benefits to warrant development.

The DVN Feasibility Study demonstrated that a national system was technically feasible and could generate a significant return on investment. An economic analysis conducted as part of the DVN Feasibility Study estimated the potential monetary benefits of reduced convictions, crashes, injuries, and fatalities at approximately \$120 million, with a payback period of less than 1 year. The economic analysis further estimated the benefit/cost ratio from the development and deployment of a national system at 15:1. The DVN Feasibility Study included a recommended approach to deploying a national ENS program.

In 2007, based on the results of the feasibility study, the FMCSA conducted a pilot program under section 4022 of TEA-21 to determine the extent to which driver performance records should be included in any information systems under the U.S. Department of Transportation's (DOT) oversight.

FMCSA established the following objectives for the ENS Pilot Test:

- Identify states willing and able to participate in the ENS Pilot Test
- Assess the feasibility, costs, safety impacts and benefits of a national notification system
- Work with the states to develop the operational concepts, requirements and designs for the system and process interfaces with State Driver Licensing Agencies (SDLA)
- Develop an implementation plan for the deployment and testing of an ENS Pilot System
- Deploy and test the ENS Pilot System

Despite challenges recruiting states to participate in the pilot program and through partnership with a third-party driver information services provider, a new architecture for the ENS Pilot Test was developed and deployed, and live transactions began in January 2007. Following the recruitment cycle, the States of Colorado and Minnesota participated in the ENS Pilot Test.

The motor carrier recruitment effort resulted in the direct participation of seven motor carriers in the ENS Pilot Test. The pilot program allowed motor carriers to register, with the driver's ex-

pressed permission, to receive timely electronic notifications of convictions and suspensions received by their drivers.

Two of the motor carriers that used the ENS Pilot System operated mid-sized fleets of 32 and 70 power units each. Five of the motor carriers that used the ENS Pilot System were very large carriers, ranging from approximately 1,250 to 13,000 power units. In total, these seven companies enrolled 1,099 drivers in the ENS Pilot System, representing approximately 2 percent of the drivers the companies employed or contracted for driver services. All of the carriers operated interstate, covering 48 States and parts of Canada (except one carrier, who limited operations to 28 States). The participants primarily operated as truckload carriers, hauling general freight, dry bulk goods, food products, and building materials. Three of the largest carriers also hauled metal products, machinery, paper products, and chemicals.

From an operational concept and technical point of view, the ENS Pilot Test was a success. The ENS Pilot System operated to specification and demonstrated an effective architecture for connectivity with a third-party service provider to identify exceptions in enrolled drivers' DHRs. Further, the ENS enabled pilot program users to obtain the DHRs from the states of record and deliver them securely to the drivers' motor carrier employer or motor carrier.

The motor carriers participating in the ENS Pilot Test described significant potential benefits in terms of early identification of poor driver performance. This allowed the carriers to remediate the driver performance to reduce crash risk immediately, rather than wait for information through annual DHR requests. This benefit also extended to identifying drivers whose driving privileges might have been suspended or revoked. Early notification enabled employers to prevent these drivers from getting behind the wheel of a truck, thus removing a potential safety and legal liability in the event of a crash or interruption of freight service as a driver is put out of service. The motor carriers also described potential administrative cost savings due to the reduced time involved in reviewing exception-based notices (notices generated when there is a change in CDL status) versus the time it takes to order and review annual (or sometimes more frequent) DHR pulls for all drivers.

Given the clear safety and operational benefits, the motor carrier participants unanimously claimed they would enroll in a national ENS if available, and that their participation in a national program should carry regulatory relief from the need to conduct annual DHR pulls.

1.4.1 DOT SAFETEA-LU Task Force

Section 4135 of the Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users (SAFETEA-LU) (P.L. 109-59) required DOT to convene a task force to identify and implement lasting program improvements to close the existing safety gap. The December 2008 report to Congress, available online at <https://www.fmcsa.dot.gov/mission/policy/commercial-drivers-license-task-force-report> also concluded that an ENS system would have significant safety benefits. The report included a recommendation to "Implement a nationwide proactive employer notification system." The Task Force report noted that implementation of an ENS program would require that a significant number of States revise their systems, resulting in in-

creased costs and that these costs would need to be supported by the CDL Program Improvement grants.

1.4.2 Previous AAMVA ENS Efforts

In May 2002, a national trucking trade association, the American Trucking Associations (ATA), sent AAMVA a proposal to implement a National Employer Pull Notice (EPN) Program -- essentially an automatic notification to a commercial driver license (CDL) holder's employer that the driver has incurred a violation while in a commercial motor vehicle. The trucking association was seeking AAMVA's support to encourage all jurisdictions to implement the EPN program. After receiving the proposal, AAMVA conducted a survey of its member jurisdictions' CDL Coordinators and driver license contacts.

At the end of September 2002, 44 jurisdictions had responded to the survey. The following bullet points highlight the findings of the survey.

- Of the 42 jurisdictions that responded, 23 jurisdictions supported the concept of developing a single national centralized EPN Program, 21 did not. Reasons for not supporting a centralized EPN Program included costs/negative revenues associated with the Program and privacy concerns.
- An additional four jurisdictions favored an EPN Program for a total of 27 jurisdictions if there was a decentralized jurisdiction based EPN Program which used common standards. Sixteen jurisdictions were not in favor of a jurisdictional based system.
- However, overall 37 jurisdictions responded that there is a need for a type of EPN Program, to improve safety on the roads and highways.
- Nine jurisdictions (AR, CA, IL, MI, NE, NY, OR, VA, WI) indicated that they have a program similar to the EPN Program outlined by ATA.
- Four jurisdictions (IA, KY, NC, and NJ) were planning/considering on offering a type of EPN Program.
- Thirty-one jurisdictions were not planning to develop such a program primarily due to funding issues, limited resources, priority of projects, or legal/institutional barriers.

1.5 SDLA Perspective

Motor carriers are required to obtain a copy of their drivers' history record annually. Thus, State Driving Licensing Agencies (SDLAs) provide approximately four million CDL holders in the U.S. with a DHR annually, sometimes more than once since many drivers change employers throughout the year. In many jurisdictions, the process of providing the DHR is a manual over-the-counter process. Jurisdictions that have an ENS report safety and customer service gains from the capability of providing the DHR electronically and reporting a change in driver status to the employer when a driver is convicted of a moving violation.

It is important to note that jurisdictions with current ENS offer the service to employers of light-duty vehicle fleets that may not employ commercial truck and bus drivers. For example, a com-

pany with a significant sales force operating regular two-axle vehicles may include in its safety policies DHR notifications of any change in the employee's driving status.

1.6 Motor Carrier Perspective

For motor carriers who pull employer records only once a year, it could be up to a year before an employer would find out that a driver was unqualified to be driving. With an ENS, the employer would receive notification whenever a conviction is added to the driver's record or when the driver's license status changes due to a suspension, revocation, or license downgrade. The timeliness of such a notification would permit the employing motor carrier to take appropriate action regarding the driver. For example, a motor carrier could institute remedial or behavioral training if the conviction indicated a possible trouble area, or the motor carrier could remove the driver from operating the company's trucks or buses if the driver was deemed unqualified to drive.

1.7 Public Policy & Safety Perspective

In 2005, the American Transportation Research Institute (ATRI) conducted research that identified specific truck driver behaviors that are most predictive of future truck crash involvement. In 2011, ATRI performed an updated analysis to discern which truck driver behaviors from the original study continue to hold predictive value in terms of crash involvement.⁴

Driver data from 587,772 U.S. truck drivers were gathered from a two-year time frame (2008-2009) and analyzed across those years to determine the future crash predictability of violations, convictions and crashes which occurred the previous year.

The analysis found that a "failure to use/improper signal" conviction was the leading conviction associated with an increased likelihood of a future crash. When a truck driver was convicted of this offense, the driver's likelihood of a future crash increased 96 percent. Ten additional convictions were also significant crash predictors; of these, eight had an associated crash likelihood increase between 56 and 84 percent, while two registered between 36 to 40 percent.

In relation to driver violations, an improper passing violation had the strongest association with crash involvement. Drivers with this violation were 88 percent more likely than their peers to be involved in a crash. Seven additional violations had significant crash associations, with five ranging in magnitude between 38 and 45 percent and two between 18 and 21 percent.

A national ENS system could improve public safety by informing employers when their drivers were convicted of these moving offenses. This would enable the employer to take immediate action regarding the driver in an effort to improve poor driving performance, reduce future offenses and prevent future crashes. Such action could involve counseling or remedial training or be as severe as removing the driver from a driving status.

⁴ Predicting Truck Crash Involvement: A 2011 Update, American Transportation Research Institute (ATRI), April 2011

2 MAP-21 Requirements for ENS Standards

2.1 Background of MAP-21 Working Group

Congress supported FMCSA's efforts to establish a notification system by providing section 32303 in the Moving Ahead for Progress in the 21st Century Act (MAP-21). MAP-21 permits employers to satisfy the requirement to check their drivers' histories annually by "receiving occurrence-based reports of changes in the status of a driver's record from one or more driver record notification systems that meet minimum standards issued by the Secretary."

Through MAP-21, Congress further supported the Secretary's plans to develop and implement a national driver record notification system. The plan was to include an assessment of the merits of achieving a national system by leveraging the Commercial Driver's License Information System (CDLIS) and an estimate of the fees that an employer would pay to offset the operating costs of the national system. The recommendations and plan were to be reported to the Committee on Commerce, Science, and Transportation of the Senate and the Committee on Transportation and Infrastructure of the House of Representatives.

In an effort to quickly advance the MAP-21 initiative and identify the States already operating ENS programs, FMCSA provided CDL Program Improvement grant funding to the American Association of Motor Vehicle Administrators (AAMVA). This grant supported the creation of a cadre of jurisdictional personnel whose mission was to discuss CDL issues and provide input to FMCSA on common protocols and best practices. The AAMVA-established working group consisted of representatives from 17 States.

The tasking to the working group was to identify the following:

- Which jurisdictions have an ENS already in place?
- What are the types of ENS currently in existence?
- What are the basic data elements of existing ENS systems?
- What are the best practices to ensure data are accurate, consistent, and complete?
- What are the recommendations and plans for the development and implementation of a national ENS, including the merits of achieving a national system by leveraging the Commercial Driver's License Information System (CDLIS)?
- What is the estimate of the fees that a motor carrier would pay to offset the operating costs of a national ENS?
- What is the level of involvement of motor carriers? What are their responsibilities under a nationwide ENS?

2.2 Existing ENS Systems

As a first step, the MAP-21 Working Group surveyed the U.S. Jurisdictions asking if they had a program by which motor carriers could register their drivers and be notified whenever their registered driver received a conviction on their DHR or when their license status changed from a licensed or eligible status. Most states responded to the survey.

Based on the survey, the following states report having an ENS in place:

Arkansas	New York
California	North Carolina
Idaho	North Dakota
Maine	Oregon
Massachusetts	South Carolina
Michigan	Texas (planned in 2017)
Nebraska	Virginia
New Mexico	Wisconsin

These jurisdictions were queried to determine the following:

- The basic data elements of their notification system
- The process by which a motor carrier enrolls its drivers
- The costs of enrolling a driver and obtaining an updated DHR
- How the employer notification was handled, either by sending the motor carrier an updated driver history when convictions or status changes occurred or simply notifying the motor carrier that a change had occurred on an enrolled driver history and the motor carrier then must submit a request for the new driver history.

Some of the features of the individual jurisdictional ENS are:

- Most jurisdictions utilize an online portal to register and view information about drivers.
- Some jurisdictions only monitor status changes, while others consider convictions, failures to appear, crashes, suspensions and revocations as triggering events.
- Some jurisdictions also monitor license and medical certification expiration dates.
- While most jurisdictions send the specific status change or driver history record to the employer when there is a change in the driver's record, some jurisdictions send a notification indicating that there has been a change. In such cases, the employer must request the driver's record to get more information.

- With some jurisdiction systems, employers are able to customize when and what information they receive based on the change in their driver's records.
- Jurisdictions send the notification or DHR to the registered employers in different ways. Some send it electronically, some upload it to the online portal to be viewed by the employer and some send it by mail/fax.
- Some jurisdictions charge a setup/maintenance fee, while others do not.
- Jurisdictions charge in a range of \$1.50 to \$13.00 per DHR and lower amounts for notification of a change in status or conviction (e.g. \$0.06 - \$0.09 per notice).

The detailed survey results are provided in [Appendix A: Jurisdictional ENS Survey Results](#).

2.3 Recommended Data Elements for Notification Message

The MAP-21 Working Group has made the following recommendations for mandatory data elements for an employer to subscribe to receive notification messages when there is a change in the Driver's Record.

- Driver name
- Driver license number
- Driver license State
- License class
- Date of birth
- Driver address
- Driver release – if required by jurisdiction, to demonstrate the driver understands their employer will be notified whenever the driver's status has changed
- Driver's Privacy Protection Act reason
- Motor Carrier Information:
 - Company Name
 - Doing Business As (DBA) Name
 - Mailing Address
 - Physical Address (if different from mailing address)
 - Billing Address (if different from mailing address or physical address)
 - Motor Carrier contact person
 - Contact person telephone number
 - Contact person email address
 - Motor Carrier Website

- Federal Employers Information Number

The SDLA, which serves as the home State of Record for a driver, already has the driver information in its database and would not have to collect those data elements when registering the driver. The majority of the missing data would be provided by the motor carrier during registration.

The data elements listed above are what the MAP-21 Working Group determined to be required for the development and deployment of a national ENS. However, if a decision is made to actually implement a national ENS, new data elements may be identified through additional analysis and design work undertaken to incorporate requirements desired by the jurisdictions, employers and FMCSA not outlined in the MAP-21 legislation.

2.4 Best Practices Recommendation for Implementation of Minimum Standards for ENS

The MAP-21 Working Group provided additional recommendations:

- Jurisdictions must post convictions to the driver's record when jurisdictional and federal regulations require. That would be whenever a conviction is received or once the jurisdictional appeals process has taken place and the conviction is finalized.
- A national ENS system should avoid negatively impacting the revenue jurisdictions derive from the sale of Driver records and should avoid negatively impacting third party DHR providers (TPP).
- The application and amount of jurisdiction fees to the motor carrier should be left up to the jurisdiction. The jurisdictions should determine if a motor carrier is billed when information is pushed or pulled.
- Motor carriers must be required to register all CDL holders they employ with the CDL issuing jurisdiction.
- Any type of proposed national ENS system must allow the jurisdictions to continue their current TPP notification access.
- At a minimum, any ENS developed, either jurisdictional or national, should automatically furnish an employer with a notification when there is a change in the status of an enrolled employee's driving privileges.
- The motor carrier should either be notified that a change in a driver's record has occurred, followed by a separate request from the employer for the driver history, or the driver history would be automatically sent to the motor carrier.
- A national ENS or mandate should recognize that some jurisdictions have statutes mandating the level of driver history detail reported to motor carriers. Under any ENS, the driver history detail obtained by a motor carrier should contain, at a minimum, all convictions, crashes, withdrawals, failures to appear, driver's license suspensions and revocations.

tions, as well as any other detail required by federal regulations and be provided in a format that is easily understood by the motor carrier.

- Any type of ENS system should allow for future expansion, for example the expiration of medical certification information could be sent to the motor carrier when a medical certification is about to expire or has expired.
- There must be an easy and cost-effective technology to allow all motor carriers to register their drivers and also allow for motor carriers to upload multiple driver records at the same time (batch processing), instead of requiring drivers to be added one at a time.

3 Other ENS Implementation Considerations

3.1 Overview

Based on the recommendations of the MAP-21 working group, AAMVA worked on identifying possible solutions for designing and implementing a national ENS. The solutions were based on the following principles:

- Jurisdictions that are currently using an employer notification system of their own should be able to continue to do so, provided the system meets the minimum regulatory requirements that are established.
- Jurisdictions should retain their record sales revenue for providing DHRs sent.
- Jurisdictions that do not wish to participate in sending DHRs to employers through a national ENS would have the option to opt out of sending DHRs through the national ENS and only choose to send a notification to employers.
- The design of the national ENS will allow TPPs to continue to play the role of intermediaries, as they currently do.
- Employers who choose to use the service of TPPs, will register at the ENS through a TPP.
- Employers who choose to use the service of TPPs, will receive notifications from ENS through a TPP.
- Employers may want to use the ENS for tracking CDL and non-CDL drivers.

The remainder of this section is structured as follows:

- [§3.2 Individual Jurisdictional ENS](#) describes a solution consisting only of individual jurisdictional ENS.
- [§3.3 National ENS Independent of CDLIS](#) describes a solution consisting of a National ENS independent of AAMVAnet and CDLIS.
- [§3.4 National ENS by Leveraging CDLIS](#) describes a solution consisting of a National ENS by leveraging AAMVAnet and CDLIS.
- [§ 3.4.1 Merits of National System leveraging CDLIS](#): describes the merits of a National ENS by leveraging AAMVAnet and CDLIS.
- [§ 3.4.2 Information Sent to a TPP/Employer](#) describes the information sent to TPP/Employer.

3.2 Individual Jurisdictional ENS

The following table sets out the objectives of a solution consisting only of an ENS developed and operated by individual states.

Objectives:

- Each jurisdiction must build its own ENS.
- Motor carriers will register their company directly or through a TPP with the jurisdiction's ENS.
- Motor carriers will register the employed drivers either directly or through a TPP with the jurisdiction's ENS.
- When there is a change in driver's record, the jurisdiction will notify the driver's employer or TPP using their own ENS.

In this solution, each jurisdiction must build its own ENS. TPPs/Motor carriers will register their company and their employed drivers with the ENS provided by the jurisdiction of license issuance. If a motor carrier employs drivers from multiple jurisdictions, the TPPs/motor carriers would have to register with multiple ENS to be able to receive notifications for all their employed drivers.

For example, suppose an employer in the DC metro area employs 6 CDL drivers, as follows:

- Drivers D1 and D6 have licenses from Maryland,
- Drivers D2 and D3 have licenses from Washington DC
- Drivers D4 and D5 have licenses from Virginia.

In this case, the employer will have to register with all the three jurisdictional ENS, as shown in Figure 1, in order to receive notifications and/or a DHR in the event the employee's driving record has changed.

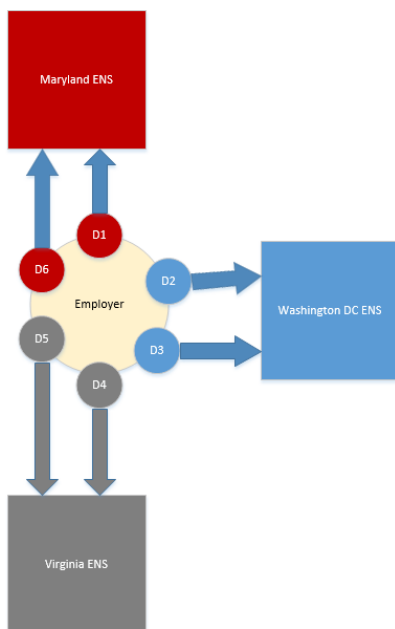


Figure 1: Employer/TPP registering with three Jurisdictions

The possible components of a jurisdictional individual ENS would consist of the following:

- Online Portal:** This would allow the TPPs/Employers to register in order to subscribe to the Jurisdictional Employer Notification System. The online portal would allow companies to register themselves by providing their company information. It would also allow companies to register the employed drivers by providing essential driver information.

The online portal would provide a means for TPP/Employers a secure login information, and upon logging in would provide them an opportunity to view details of their drivers and view any changes in their driving records.
- Employer Registry:** This would be the source where all the registered TPP/Employer information is stored. When the TPP/Employers register their company, this information is stored here.
- Driver Registry:** This contains the basic driver information for all registered drivers. The TPP/Employer information stored at the Employer Registry will be mapped to the driver's information stored in the Driver Registry. This driver registry can be the DHR repository at the Jurisdiction.

When there is a change in the driver's record, the jurisdiction of license issuance sends the driver information to the driver's employer through their jurisdictional ENS. The ENS would be able to match the driver to the TPP/employer, provided the driver is registered. ENS would then send the driver information to the TPP/employer in a secure way, as shown in Figure 2.

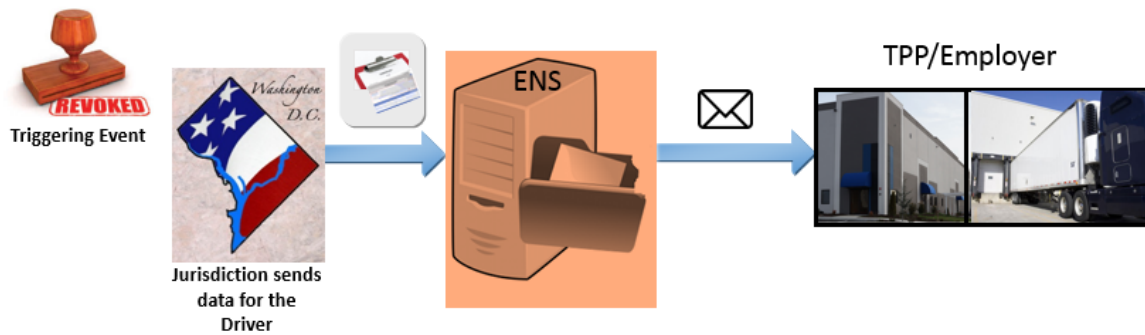


Figure 2: Jurisdiction ENS Sends Notification to the Registered Employer

Table 1 lists the merits and drawbacks of this approach.

Table 1: Merits & Drawbacks of Individual Jurisdictional ENS

Merits	Drawbacks
<p>Jurisdictions have the flexibility of designing the system with features and options that they desire.</p> <p>Jurisdictions have the flexibility with the revenue generated, as they can make changes to the fees without depending on another entity (like National ENS).</p>	<p>Not all jurisdictions may have the resources necessary to build and administer their own notification system.</p>
	<p>Registration cost may be high for TPPs/employers as they have to register and maintain connectivity with multiple systems.</p>
	<p>TPPs/Employers will be responsible for keeping track of each employed driver and the current jurisdiction where the driver is licensed.</p>
	<p>Added overhead for administering multiple contracts with multiple organizations.</p>

3.3 National ENS Independent of CDLIS

The following table sets out the objectives of a solution consisting of a national ENS independent of CDLIS.

Objectives:

- A national ENS will be developed as a stand-alone system.
- This stand-alone system will be independent of CDLIS.
- If jurisdictions choose to participate, TPPs/employers will register their company and employed drivers licensed in these jurisdictions at this national ENS.
- For jurisdictions that choose not to participate in the National ENS, TPPs/employers will have to register individually with each jurisdiction that does not participate.
- When there is a change in driver’s record, the jurisdiction (that participates with the national ENS), will notify the driver’s employer or TPP using the national ENS.
- The national ENS will contain TPP/employer information as well as the basic driver information.

In this solution, a national ENS will be developed, for jurisdictions that do not have their own ENS, or for those that choose to participate in a national notification system. TPP or motor carriers will register their company and the drivers with the national ENS. If a motor carrier employs drivers from different jurisdictions, they would still be able to register via a common registration portal, provided all of the jurisdictions of license issuance participate in the national ENS. Such employers, however, will receive notifications only on drivers licensed in jurisdictions participating in the national ENS. When a TPP/motor carrier registers their company and the employed drivers, both the TPP/employer information as well as the basic driver information will reside at the ENS.

For example, suppose there are three motor carrier companies, A, B and C as shown in Figure 3.

- Employer A, B and C will all register with the National ENS.
- Employer A will register their drivers with the National ENS.
- Employer B will register their drivers with the National ENS.
- Employer C will register their drivers with the National ENS.

All employer data will reside in one central location, at the national ENS.

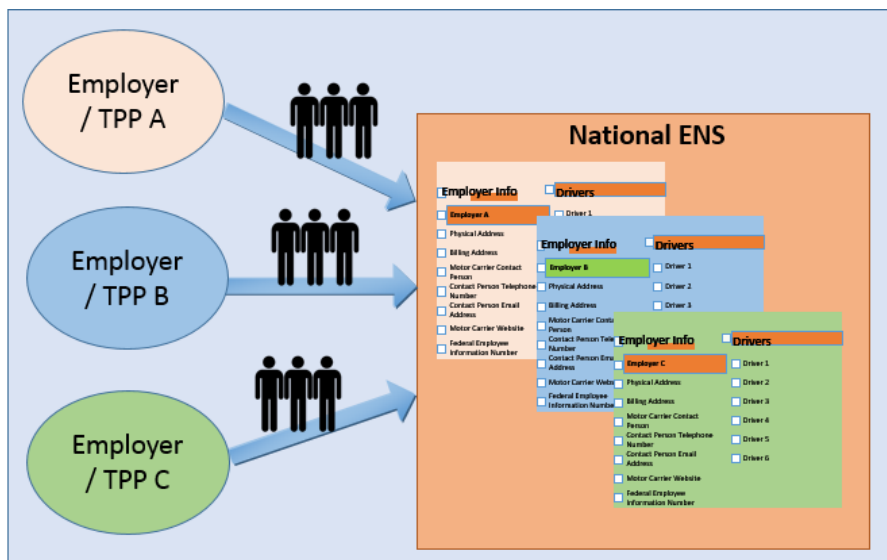


Figure 3: Different Employers/TPPs Register at National ENS

The possible components of a national ENS independent of CDLIS would consist of the following:

- **Online Portal:** This would allow the TPPs/Employers to register in order to subscribe to the National Employer Notification System. The online portal would allow companies to register themselves by providing their company information. It would also allow companies to register the employed drivers by providing essential driver information.

The online portal would provide a means for TPP/Employers a secure login information, and upon logging in would provide them an opportunity to view details of their drivers and view any changes in their driving records.

- **Employer Registry:** This would be the source where all the registered TPP/Employer information is stored. When the TPP/Employers register their company, this information is stored here.
- **Driver Registry:** This contains the basic driver information for all registered drivers. The TPP/Employer information stored at the Employer Registry will be mapped to the driver’s information stored in the Driver Registry.

When there is a change in the driver’s record, the jurisdiction of license issuance sends the driver information to the TPP/Employer through the national ENS. When the jurisdiction sends the driver information to the national ENS, the driver information is matched with the TPP/employer information, provided the driver is registered with the system. Once the ENS has the TPP/employer information for the driver, ENS will send the driver information to the TPP/employer in a secure format, as shown in Figure 4.

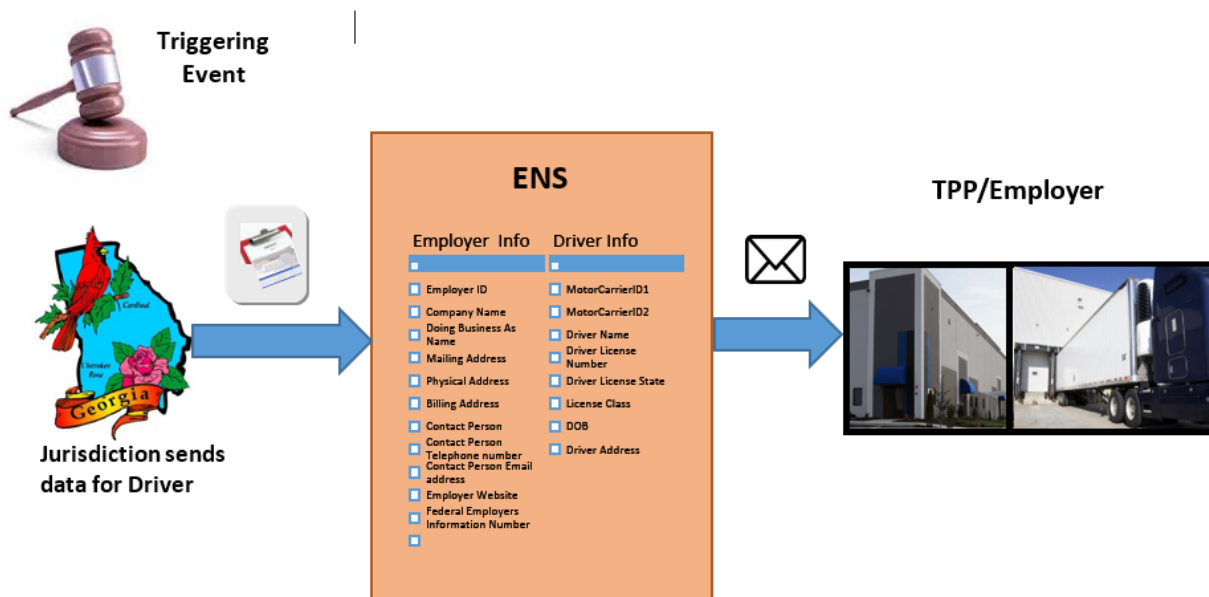


Figure 4: National ENS sends driver information to Employer/TPP

Table 2 lists the merits and drawbacks of this approach.

Table 2: Merits & Drawbacks of the CDLIS-Independent National ENS Approach

Merits	Drawbacks
Less burden on the jurisdictions as they don't have to spend time and resources to build their own systems.	Driver data is duplicated at ENS and CDLIS, making the system more prone to errors.

Cost effective and practical for TPPs/employers, as they would only need to register at one national system (for jurisdictions participating with the national ENS).	New message format and communication protocol (different from AAMVAnet standards) have to be implemented by the jurisdictions.
Offers simplicity from an administrative point of view both, for participating jurisdictions and motor carriers.	Not cost effective, as there is need for excess storage and new communication networks.

3.4 National ENS by Leveraging CDLIS

The following table sets out the objectives of a solution consisting of a national ENS leveraging CDLIS.

Objectives:

- A national ENS will be developed using the existing AAMVAnet infrastructure and will be offered to jurisdictions that wish to participate. CDLIS will be used to verify the drivers that are being registered at the ENS.
- If jurisdictions choose to participate, TPPs/employers will register their company and employed drivers licensed in these jurisdictions at this national ENS.
- When there is a change in driver’s record, the jurisdiction (that participates with the national ENS) will notify the driver’s employer or TPP using the national ENS.
- The national ENS will contain TPP/employer. Driver information will not be duplicated at the ENS. The ENS will use the basic driver information that is already present in CDLIS.

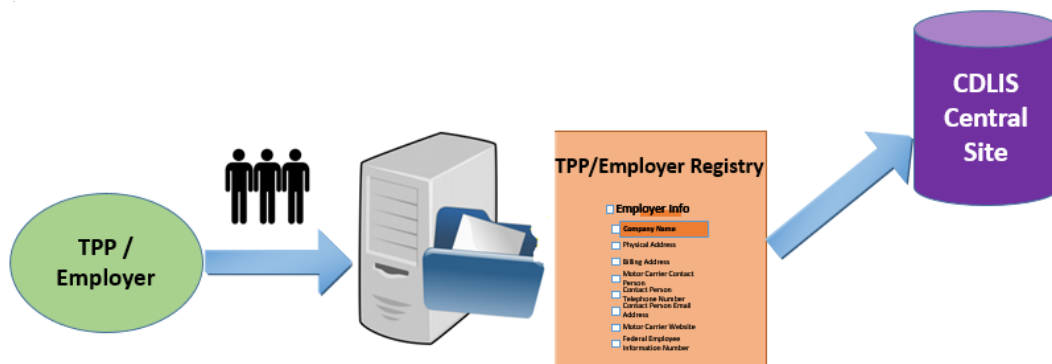


Figure 5: National ENS Leveraging CDLIS

In this solution, a national ENS will be developed using the existing AAMVAnet infrastructure and will be offered to jurisdictions that do not have their own ENS or wish to participate in a national notification system. CDLIS will be used to verify the drivers that are being registered at the ENS. TPPs/employers will register their company and their employed drivers with the national ENS as shown in Figure 5 above. If a motor carrier employs drivers from multiple jurisdictions,

they would still be able to register in one place at the national ENS. Such employers, however, will receive notifications only on drivers licensed in jurisdictions participating in the national ENS.

The components of a national ENS built using AAMVAnet and CDLIS would consist of the following:

- **Online Portal:** This would allow the TPPs/Employers to register in order to subscribe to the National Employer Notification System. The online portal would allow companies to register themselves by providing their company information. It would also allow companies to register the employed drivers by providing essential driver information.

The online portal would provide a means for TPP/Employers a secure login information, and upon logging in would provide them an opportunity to view details of their drivers and view any changes in their driving records.

- **Employer Registry:** This would be the source where all the registered TPP/Employer information is stored. When the TPP/Employers register their company, this information is stored here.
- **CDLIS Central Site:** This contains the basic driver information for all commercial driver license holders. The TPP/Employer information stored at the ENS will be mapped to the driver's master pointer record (MPR) on CDLIS.

When there is a change in the driver's record, the jurisdiction of license issuance sends the driver information to the TPP/Employer through the national ENS. When the jurisdiction sends the driver information to this system, the driver information is verified with the driver's MPR on the CDLIS Central Site. The driver's TPP /Employer information is retrieved from the employer registry, if the information received is for a driver registered with the system. The driver information is then sent to the TPP/Employer in a secure way as shown in Figure 6.

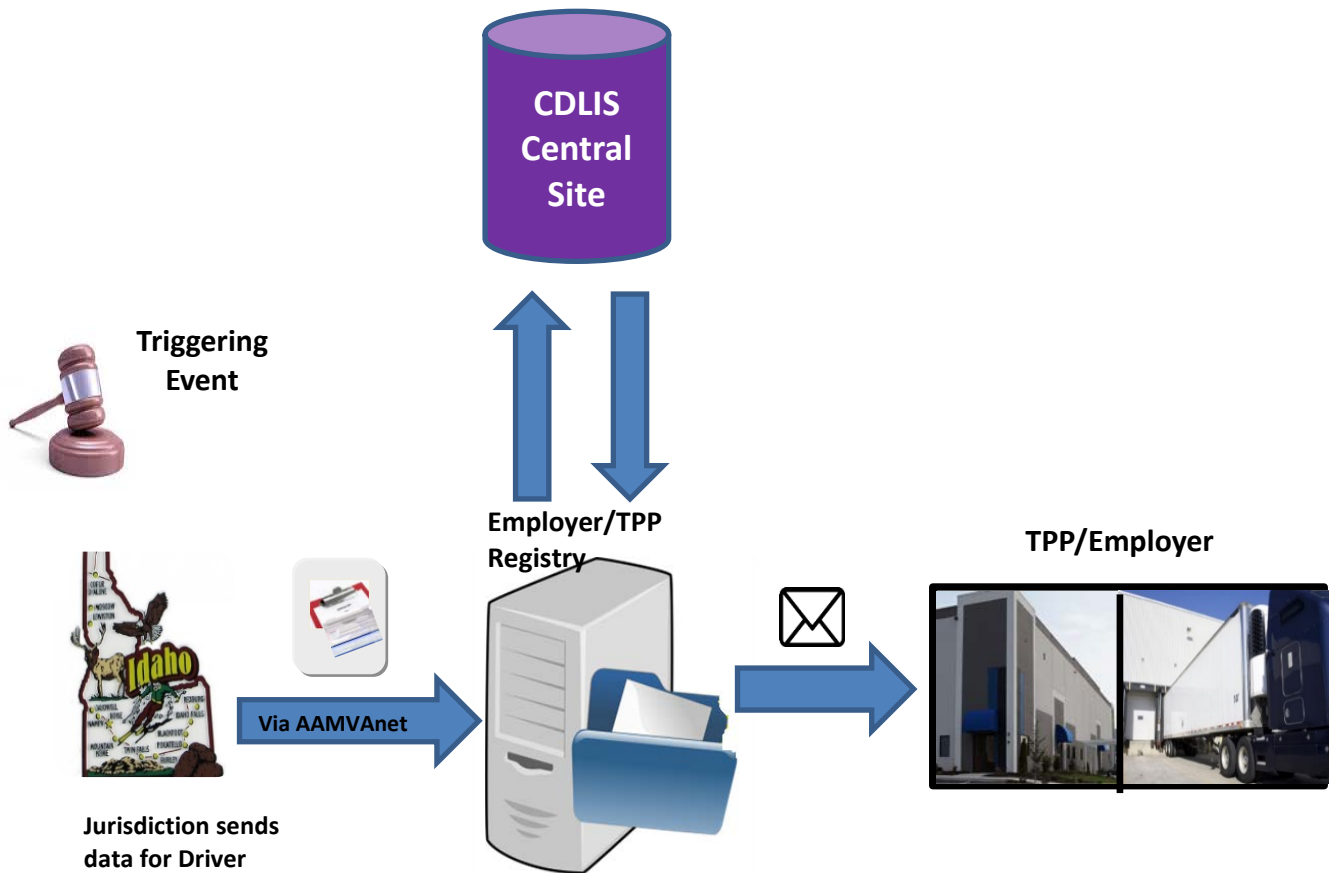


Figure 6: National ENS Leveraging CDLIS Sends Driver Information to TPP/Employer

3.4.1 Merits of National System leveraging CDLIS

Based on some of the drawbacks seen for other implementations, AAMVA performed a detailed analysis of the merits of building a national ENS by leveraging AAMVAnet and CDLIS. Some merits of this solution in comparison to the other solutions are:

- Less burden on the jurisdictions to spend the time and resources to build their own individual notification systems.
- Cost effective and practical for TPP/employers as they would only need to register at one National system (for jurisdictions participating with the national ENS).
- Offers simplicity from an administrative point of view both, for participating jurisdictions and motor carriers.
- The TPP/employer registry will be a compact system that contains information of only the registered employers, not having to store information about the drivers.
- Driver data is not duplicated as the system would use the driver information already present at CDLIS, making it less prone to errors.

- Driver data sent by the jurisdiction when there is a change in driver's record can be verified with existing pointer information at the Central Site, to make sure that the information is for a valid driver for whom a pointer already exists. This would reduce the risk of errors.
- The system leverages jurisdiction's existing AAMVAnet/CDLIS message format and protocol making it easier to implement.
- The system will use the benefits and information already present in an existing system.

3.4.2 Limitations of National System leveraging CDLIS

- Though the National ENS is designed to meet most of the Jurisdictions' desired features, there is a possibility that it might not be able to accommodate some.

3.4.3 Information Sent to TPP/Employer

When there is a change in the driver's record, the jurisdiction of license issuance sends a notification to the TPP/employer through ENS. The information sent from the jurisdiction can be the DHR, or only a notification indicating that there has been a change in driver's record, or both.

Following are four options for the data sent by the jurisdiction to the employer when there is a change in the driver's record.

1. Jurisdiction sends a notification that contains the reason for change and minimal information to identify the driver. The TPP/employer may follow existing procedures to obtain DHR separately.
2. Jurisdiction sends the DHR for the driver only.
3. Jurisdiction sends the notification that contains the reason for change in driver's record and the DHR for the driver.
4. Jurisdiction first sends the notification that contains the reason for change in driver's record, and will only send the DHR if the jurisdiction chooses to participate in sending driver records through ENS.

4 CDLIS Working Group’s Recommended Solution

4.1 Overview

AAMVA presented all the implementation options discussed in [§3 Other ENS Implementation Considerations](#) to the CDLIS Working Group. Following the presentation, the states were sent a short survey that asked them to vote on the implementation option they would recommend as the most favorable. The CDLIS Working Group recommended building a national ENS by leveraging CDLIS. The Working Group also recommended that the system should provide jurisdictions the capability to opt in or out of sending the DHR to the TPP/Employer (option 4 under [§3.4.2 Information Sent to TPP/Employer](#)).

In this option, the jurisdiction first sends the notification that contains the reason for change in driver’s record. Once ENS receives this from the jurisdiction, it will request a DHR from the jurisdiction, if it has chosen to participate in sending DHRs through ENS. ENS will then send this notification/DHR to the employer/TPP.

4.2 Recommended Solution Process Flow

The following sub-sections provide the technical process flow diagrams for the recommended solution.

4.2.1 Employer and Driver Registration

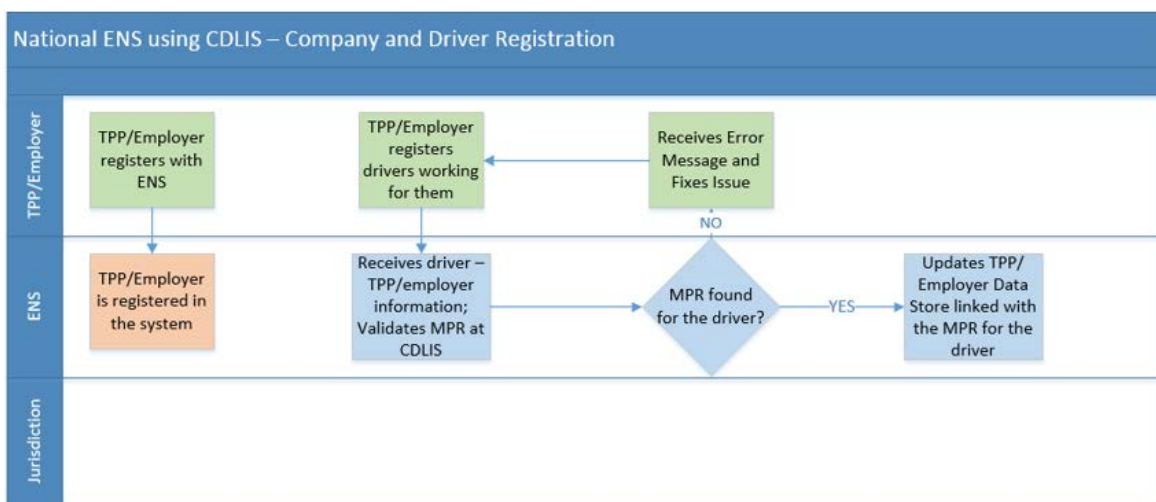


Figure 7: Process Flow for TPP/Employer Registration

4.2.2 TPP/Employer Registration

1. TPPs/Employers that choose to receive notifications about their drivers register with the ENS.
2. Once the TPP/employer registers, their information is stored at the ENS.

4.2.3 Driver Registration

1. TPP/Employer registers drivers working for them with the ENS.
2. The ENS verifies driver information against CDLIS MPR for the driver.
3. If the MPR is not found for the driver, ENS sends an error message back to the TPP/employer.
4. If the MPR is found for the driver, it updates the TPP/employer information in the TPP/employer data store.
5. This TPP/employer data store will link employer information with the MPR for the driver.

4.2.4 TPP/Employer Notification

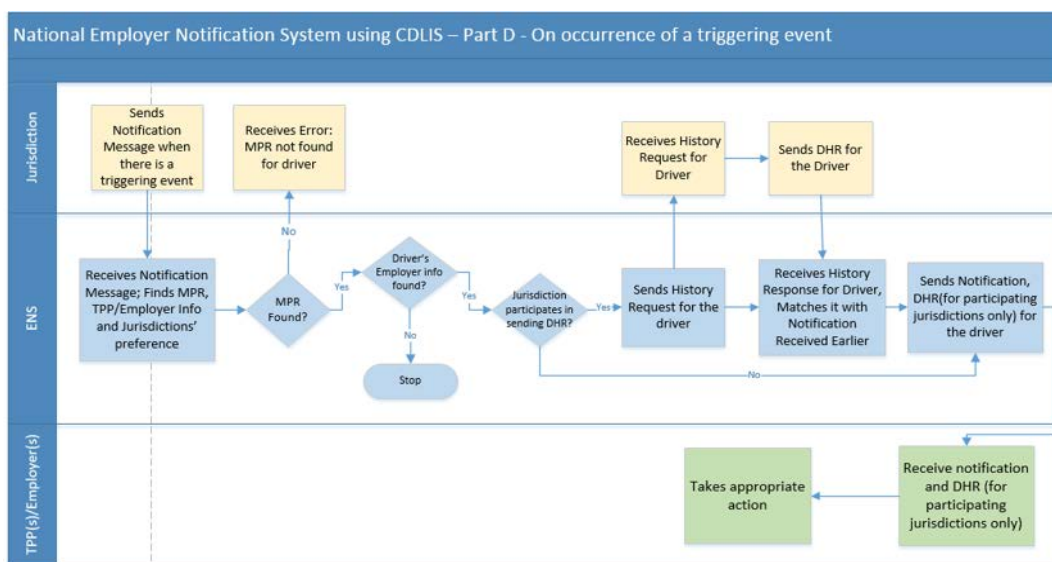


Figure 8: Process Flow for sending TPP/Employer Notification

4.2.5 Jurisdiction Sends Notification

Jurisdiction sends notification to ENS when there is a triggering event and there is a change to the driver’s record.

1. ENS finds the MPR for this driver and verifies driver information received.
2. If it is not able to find MPR, it sends an error message back to the jurisdiction.
3. ENS then verifies to see if the driver is registered and employer information could be found.
 - If TPP/employer information is not found, ENS stops further processing.
 - If the information sent is for a valid registered driver, ENS checks if jurisdiction participates in sending DHR.
 - If yes, then ENS sends DHR request for the driver to the jurisdiction.

4.2.6 Jurisdiction Sends DHR

1. Jurisdiction sends the DHR for the driver.
2. ENS receives DHR for the driver, matches it with the notification message received earlier.

4.2.7 ENS Sends Notification/Driver History

- ENS sends the Notification, & DHR (for states opting to send the DHR via the ENS) received from the jurisdiction to the TPP/employer.

4.3 Fee Model

AAMVA has put together an estimate of costs and fees for the recommended solution.

4.3.1 General Assumptions for Fees

The fee model is based on these assumptions:

- The total number of operational CDL drivers has been estimated at 4 million drivers based on the FMCSA 2016 Pocket Guide to Large Truck and Bus Statistics. The 2016 Pocket Guide can be found by following the link below:
<https://www.fmcsa.dot.gov/safety/data-and-statistics/commercial-motor-vehicle-facts>
- Estimating that there will be a need of 5 years for administrative approvals, final rule establishments, specifications and requirements gathering, design, implementation and testing of the system. All estimates have been done assuming the system would be operational in 2022.
- The fee model is based on the assumption that there will be a ramp up time of 3 years for all drivers to be registered with the notification system, after it is first operational.
- The fee model assumes that states using their own ENS will not be mandated to use the nationwide system.
- The fee model assumes that states using the nationwide solution will not be charged a participation fee.
- No adverse impact is anticipated to TPP/Employer Fees. The current business relationship between TPP and employers will not be impacted. TPPs will be given the opportunity to participate in the nationwide ENS solution and to provide an additional notification service to their existing portfolio of information services.
- No adverse impact is anticipated to revenue collected by States for DHR. Jurisdictions will be able to collect the same DHR charges for driving records they send either directly to the employers or via the ENS system. The DHR charges varies with each jurisdiction and will be accurately charged to the TPP/Employer based on the particular jurisdiction's charges.

- 2016 DHR fees that States charge to TPP/Employers range between \$1.50 and \$13.00. This needs to be added to the total fees assessed on the TPP/Employer.
- Implementation of a national ENS would require a significant number of States to revise their systems, resulting in increased costs. These costs would need to be offset by making federal funds like the CDL Program Improvement grants, available to the jurisdictions.
- The jurisdictions will not be assessed a fee for using the national ENS.
- The jurisdictions may receive a share of the fees collected from the TPPs/Employers registered to use the national ENS.

The fees are comprised of three parts, as set out in the following sub-sections.

4.3.2 Annual Driver Fees

In order to provide predictability in cost for ENS participants a fee per registered driver was selected as opposed to a fee per notification. This fee covers costs for the initial set up and, operations and maintenance of the system.

In order to make a fair assessment of the costs for a scenario that may be present at the time of implementation of this solution, estimates were developed for four possible scenarios. The scenarios primarily differ based on the number of participants in the national notification system. Currently, 16 states have implemented their own ENS. Each of these systems function independently of each other. Estimates were developed assuming that a range of 16 to 21 states will use their own ENS, even after a nationwide system is implemented. This implies that the national ENS will have 30 to 35 participating states.

The estimates also compared scenarios with or without federal funding for the initial development and operations of the national ENS.

The table below shows the annual per driver fee for the participating employers/TPPs.

Per Driver Annual Fees for an Employer/TPP
\$0.11 to \$0.57

It is important to note that the annual per driver fee assessed on employers/TPPs reduces by approximately 45%, if federal funds pay for the initial development and maintenance of the national ENS.

4.3.3 State Fees

This is a fee assessed by the jurisdictions for each DHR transmitted to the TPP/Employer. 2016 fees range between \$1.50 and \$13.00 per DHR.

Per DHR Fees for an Employer/TPP
\$1.50 to \$13.00

4.3.4 Third Party Provider Fees

It is possible that the TPP may assess fees on the employers for the usage of the national ENS. The estimates for these fees have been excluded from this report as AAMVA has not been able to find enough information on the subject.

5 Best Practices for People & Processes

Any employer notification system works best when an organizational structure is established for the people and processes involved. It is highly recommended that an Implementation Guide/Procedures Manual be documented that explains best practices in detail for the participants of the ENS. The following sections provide some high level recommendations.

5.1 Jurisdictions

Jurisdictions must post convictions to the driver's record when jurisdictional and federal regulations require. That would be whenever a conviction is received or once the jurisdictional appeals process has taken place and the conviction is finalized. This is highly critical for the national ENS to be effective in keeping unsafe drivers off the roads.

Any type of national ENS system shall continue to generate revenue for the jurisdictions for the DHRs sent.

5.2 Third Party Providers/Motor Carriers

Many organizations currently serving as TPPs to provide either Driving History Records and/or Notification of status change to employers should be allowed to continue to do so. It is recommended that TPPs be permitted to play the same role of intermediaries, between the employers and the national ENS that they currently play with state's individual ENS systems.

Employers who choose to use the service of TPPs, would register at the national ENS through a TPP and receive notification from ENS through that TPP as shown in the figure below. Jurisdictions who currently work with TPPs to provide the DHR, would have the option to opt out of participating in sending DHRs through the national ENS and only choose to send a notification.

Motor carriers should be required to register all CDL holders they employ, and will want to be sure they have an employment policy in place to ensure drivers acknowledge the employers access and use of driver record information as a condition of employment. Such a policy might include notice that the employee's driving record may be reviewed within the context of the driver's entire motor vehicle record before disciplinary action is taken. However, it would be appropriate for the motor carrier to prohibit the employee from operating a company CMV if the change in license status disqualifies the driver under state or federal standards.

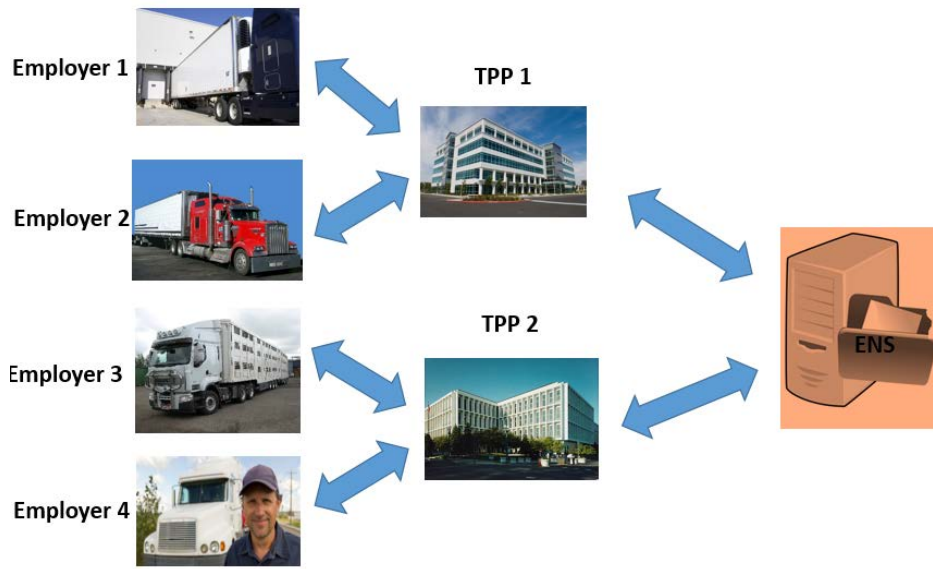


Figure 9: Employers registered at the ENS through TPPs

5.3 Third Party Provider/Motor Carrier Registration

It is recommended that ENS system documentation explain how TPPs/Motor Carriers would register their business entities at the ENS including the following in detail:

- Motor Carriers registration process with ENS directly or through a TPP.
- Any registration fees or charges.
- Method of registration for TPP/Motor Carrier, e.g. through an online portal.
- TPP/Motor Carrier shall provide the following information at the time of registration:
 - Company Name
 - Doing Business as Name
 - Mailing Address
 - Physical Address – if different from mailing address
 - Billing Address – if different from mailing address or physical address
 - Contact Person
 - Contact Person Telephone number
 - Contact Person Email Address
 - Website
 - Federal Employers Information Number

5.4 Third Party Provider/Motor Carrier Registration of Participating Drivers

It is recommended that the documentation clearly detail how employers will register their employed drivers in the ENS. The document will explain the registration process and talk about the following in detail.

- How motor carriers would register CDL holders they employ with the ENS directly or through a TPP.
- How motor carriers may register their drivers with the national ENS through an online portal.
- How motor carriers may register multiple drivers at the same time through a batch process, instead of requiring drivers to be added one at a time.
- The process for motor carriers to collect a Driver Release, if required, to demonstrate that the driver understands their employer will be notified whenever the driver's status has changed.
- The information that motor carriers would provide at the time of driver registration. At a minimum, the information should include the following:
 - Driver Name
 - Driver License Number
 - Driver License State
 - Date of Birth
 - Employer Name

5.5 Driver Participation

The Implementation Guide should document the role of the drivers in the national ENS. Drivers need to be made aware that their employers, when registered in the ENS, will receive notifications about changes to their driving records. Drivers would submit a Driver Release, if required, to demonstrate that he/she understands their employer will be notified whenever the driver's status has changed.

6 Best Practice Recommendations

6.1 Best Practices for Outreach & Training

It is recommended that training sessions be made available to the employers/TPPs and jurisdictions to cover the following topics:

- Registration process
- Benefits to be realized from the system
- Technical considerations related to the software
- Training on how to administer and use the system
 - Logging into the system
 - Updating business information
 - Adding and deleting employees
 - Setting employer business rules
 - Setting up parameters regarding when to receive notifications
 - Setting up parameters regarding when to receive DHR'

Outreach and training may be delivered via online portals, webinars or conferences. The objective should be to ensure all stakeholders are aware of the requirements and how the new system may be used to satisfy these requirements.

6.2 Best Practices for Safeguarding Privacy

The CMVSA requires employers and prospective employers to ensure their commercial drivers are not precluded from operating a commercial motor vehicle. CDLIS allows employers and prospective employers to obtain basic identification data on a driver, with the certified permission of the driver, directly from the CDLIS Central Site. The employers are also required to obtain a DHR each year for each CDL holder they employ.

A national ENS system allowing the U.S. Motor Vehicle Agencies to provide automatic notification of driver convictions and license sanctions to employers would be operated under the oversight of the Federal Motor Carrier Safety Administration.

The Privacy Act of 1974, the Fair Credit Reporting Act of 1970 (FCRA) and the Driver's Privacy Protection Act of 1994 (DPPA) define the legal framework under which personal information may be collected, used, maintained and shared by an ENS system.

Written policies should be established, including requirements addressing the protection of the confidentiality and privacy of personally identifiable information (PII) through appropriate administrative, technical and physical safeguards to deter and detect unauthorized access, destruction, use, modification, or disclosure.

Appendix A: Jurisdictional ENS Survey Results

The following table summarizes the results of a survey conducted by the MAP-21 Working Group to determine whether or not jurisdictions are using an ENS.

Table 3: MAP-21 Working Group Jurisdictional ENS Survey Results

Jurisdiction	Have ENS?		Comments
	no	yes	
Alabama	✓		-
Alaska	✓		-
Arizona	✓		-
Arkansas		✓	Arkansas has an ENS called Driver Watch. Driver Watch monitors the validity of any commercial driver's license issued in Arkansas. Through scheduled driver status checks of Arkansas driving records — bi-monthly, monthly, quarterly or semi-annually — Driver Watch keeps an eye on the drivers listed in your Driver Watch List and makes the results available online anytime of the day or night. Base fee for driver record request is \$11.50 plus a \$95.00 annual account fee. See http://www.arkansas.gov/driverwatch .
California		✓	The CA Employer Pull Notice (EPN) system provides the employer with a report showing the driver's current public record, any subsequent convictions, failures to appear, accidents, driver license suspensions or revocations, or any other actions taken against the driving privilege or certificate. A code is added to the driving record, when an employee is enrolled in the program that identifies the employer that will be receiving the driving record. When an employee's driving record is updated to record an action/activity, a check is made electronically to determine if a pull notice is on file. If the action/activity is one that is specified to be reported under the EPN program, a driver record is generated and sent either electronically or mailed to the employer of record. The EPN program automatically generated a driver record when any of the following action/activities occurs: <ul style="list-style-type: none"> • Upon enrollment of the driver in the EPN program.

Jurisdiction	Have ENS?		Comments
	no	yes	
			<ul style="list-style-type: none"> • Annually from the date of enrollment or 12 months from the last action/activity printout. • When a driver has any of the following action/activities added to his/her driving record: <ul style="list-style-type: none"> - Convictions - Failures to Appear - Accidents - Driver License Suspension or Revocations - Any other actions taken against the driving privilege Employer Pull Notice website: http://www.dmv.ca.gov/vehindustry/ept/eptformlist.htm
Colorado	✓		-
Connecticut			-
Delaware	✓		-
D.C.			-
Florida			-
Georgia	✓		-
Hawaii	✓		-
Idaho		✓	Idaho has an online service called Access Idaho. Organizations can get subscription to this and provide driver license numbers to be monitored. Idaho driver records are checked automatically twice a month for any new conviction and/or suspension, and are flagged. These can be reviewed immediately. Medical certificate issue & expiration dates and driver license expiration date are updated and viewable from the dashboard provided to subscribers.
Illinois	✓		-
Indiana	✓		-
Iowa	✓		-
Kansas	✓		-

Jurisdiction	Have ENS?		Comments
	no	yes	
Kentucky	✓		-
Louisiana	✓		-
Maine		✓	Maine has an online service that for a fee allows employers to automatically receive notification about changes to an employee’s driving record. The employer sets up a profile of their drivers, the frequency that they want to receive notification along with an e-mail address and results are sent automatically and electronically.
Maryland			-
Massachusetts		✓	The Massachusetts service is called Driver Verification System. Employers may opt in to the system, and are given a web portal to post their driver information. The employer is responsible for keeping their driver roster current. The employer receives an email notification of a change of status of the license; from active to expired, revoked, suspended, etc. Notification is not provided if there is a conviction that does not require an action on the right to operate causing a change in license status.
Michigan		✓	The program is called Driver Record Subscription Services and provides an organization with a baseline driver record of their employees when enrolled, on an annual basis, and whenever there are any violations, restrictions, suspensions, or revocations posted to the record. The fee for each record is \$8.00 and is billed monthly. To obtain the forms to participate in the program, send an email to: mailto:CommercialServices@michigan.gov
Minnesota	✓		Motor carriers can access driver license status information 27/7 via DPS website.
Mississippi	✓		-
Missouri	✓		-
Montana	✓		-
Nebraska		✓	Driver License Record Monitoring - This service allows online service subscribers to monitor Nebraska driver license records for changes due to any adjudicated traffic citation or admin-

Jurisdiction	Have ENS?		Comments
	no	yes	
			<p>istrative action. Listings of records are submitted by the subscriber via FTP for monitoring on a monthly basis. A \$.06 fee is charged per record. If changes have been made to the driver record during the monitoring period, the full record is returned via a batch process and the statutory \$3.00 driver record fee is charged to the subscriber.</p> <p>Driver License Record Administration System - This service allows online service subscribers to maintain a listing of individuals/employees online that require frequent review of driver license records. Once the driver information is entered into the system, it can be purchased and reviewed immediately with a click of a button. The entries are retained by subscription customer account to provide for future purchase and review of the same records by a click of the mouse. The statutory \$3.00 per record fee is charged to the subscription account for each matching record.</p> <p>Planned updates, scheduled to be deployed first quarter 2014, to this System will provide for the monthly monitoring of selected records for a fee of \$.06 per record per month with email notifications when changes due to any adjudicated traffic citation or administrative action occur. If changes have been made to the driver record during the monitoring period, the full record may be viewed by a click of the mouse and the statutory \$3.00 driver record fee is charged to the subscriber.</p> <p>Businesses that submit frequent requests for driving records may wish to consider receiving these records electronically. Specific information regarding this method of receiving records may be obtained by contacting:</p> <p style="padding-left: 40px;">Nebraska.gov 301 South 13th Street, Suite 301 Lincoln, NE 68508-2593 (402) 471-7810</p>
Nevada	✓		-
New Hampshire	✓		-

Jurisdiction	Have ENS?		Comments
	no	yes	
New Jersey	✓		-
New Mexico		✓	-
New York		✓	New York has an automated program called LENS - License Event Notification System. An employer must enroll in the voluntary program and depending on the level of service the employer chooses they can get accidents, convictions, expirations, suspensions and revocations. LENS home page: http://dmv.ny.gov/lens
North Carolina		✓	The NC Transportation Notification System (TNS) provides city agencies, state agencies, county agencies, federal agencies and commercial companies 24/7 "at a glance" access to view a company's driver license status. The TNS provides on line real-time viewing of a driver's traffic convictions, driver license suspensions, driver license cancellations and commercial driver license disqualifications. In addition, when a driver receives a traffic conviction, the company in which the driver is employed receives notification of the citation the driver received. Contact Barbara Webb - (919)861-3299
North Dakota		✓	Online Portal through a TPP. Driving records are queried once a month to see if there are any changes. A driver report is sent once a month to the employer stating the changes if any. Report sent electronically to the employer and a letter is sent to the driver as well. The fee for each record sent is \$3.00.
Ohio	✓		-
Oklahoma			-
Oregon		✓	Oregon currently has an ENS program for motor carriers called ARS, Automated Reporting System. Employers sign up for the program. Based off of a request from the employer, DMV puts a tickler on the driver's record. The tickler automatically sends a record out to the employer when a DMV changes certain information on driver's record, such as, adding a conviction or suspending a driver. The fee for the record is \$1.50. We have a couple special

Jurisdiction	Have ENS?		Comments
	no	yes	
			records for motor carriers that contain the medical card data and one that contains positive drug test results. Website: http://www.oregon.gov/ODOT/DMV/pages/faqs/records.aspx
Pennsylvania	✓		-
Rhode Island	✓		-
South Carolina			-
South Dakota	✓		-
Tennessee	✓		-
Texas	✓		Developing a notification program now. Will require the purchase of a driver record and for a fee of .09 - .11 cents per month the department will monitor the record for any status change or driver history updates and notify the employer or insurance company.
Utah	✓		-
Vermont	✓		-
Virginia		✓	This program was originally implemented in 1990 as a requirement under the Federal Commercial Driver License requirements to assist schools and employers of CDL drivers with complying and receiving an annual risk assessment driving transcript for employees. Today, the program has been expanded even further to allow any company to enroll in the Driver Alert program. As of June 2012, a manually administered paper program became fully automated with electronic transmission of data and the capability of the employer adding and deleting employees and selecting the notification criteria. The enhanced voluntary Driver Alert program gives employers the opportunity to customize when they would like to receive driving transcripts for their employees and are billed \$9 for each driving transcript generated. Companies enrolling in the Driver Alert program use a custom designed secure web application to maintain their lists of employees/drivers they wish to have monitored. Employers may select one or any combination of electronic notification criteria: <ul style="list-style-type: none"> • Immediate pre-employment driving record access

Jurisdiction	Have ENS?		Comments
	no	yes	
			<ul style="list-style-type: none"> Immediately following any moving violation conviction Upon receipt of the accumulation of seven demerit points within a calendar year Immediately following any suspension, revocation, disqualification; reckless driving or driving while intoxicated convictions. <p>To date, over 786 employers have elected to monitor their employees and the number continues to grow. We are currently monitoring 3 million drivers and we collected \$5.1 million dollars in revenue last fiscal year.</p> <p>Website: http://www.dmv.virginia.gov/commercial/#voluntary.asp</p>
Washington		na	-
West Virginia	✓		In planning stages now
Wisconsin		✓	<p>Wisconsin has Employer Notify. It is a feature within our Public Abstract Records System (PARS). Employers can sign up to receive real-time and weekly updates on changes to their employee driver records. It is free to sign up and to register for employee notify and to receive notices. Employers can then purchase the driver record for \$5, and receive it electronically in pdf format. FedMed information is provided for free on other screens, showing tier of operation (NI, NA, EI, EA), expiration date for FedMed card. Employers can upload new FedMed cards for free as well. Notifications are also sent for Interstate Non-excepted drivers 60 days before expiration, at expiration, and at downgrade (10 days later). PARS is administered by Wisconsin interactive Network. Organizations sign a contract, provide background checks for all employees, and set up an Automated Clearing House account for payment. They receive access to purchase vehicle and driver records, register employees, sign up for employer notify, and audit their employees' use of the application.</p> <p>Link to the PARS website: http://www.dot.state.wi.us/drivers/drivers/pars/index.htm</p>
Wyoming			-

Glossary

AAMVA	American Association of Motor Vehicle Administrators
AAMVAnet	AAMVA's telecommunication network that links Motor Vehicle Departments, other public and private sector authorized users, and data repositories.
ATA	American trucking Association
ATRI	American transportation research institute
CDL	Commercial Driver's License
CDLIS	Commercial Driver's License Information System
DHR	Driver History Record
DOT	Department of Transportation
DPPA	Driver's Privacy Protection Act
DVN	Driver Violation Notification
EIS	Explore Information Service
ENS	Employer Notification System
EPN	National Employer Pull Notice
FCRA	Fair Credit Reporting Act
FMCSA	Federal Motor Carrier Safety Administration
MAP-21	Moving Ahead for Progress in the 21st Century Act
MPR	Master Pointer Record
OODA	Owner-Operator Independent Driver Association
PARS	Public Abstract Records System
PII	Personally Identifiable Information
SAFETEA-LU	Safe, Accountable, Flexible, Efficient Transportation Equity Act: A Legacy for Users
SDLA	State Driver Licensing Agency
TNS	Transportation Notification System
TPP	Third Party Provider

Release History

Release	Date	Name	Comments
1.0.1	27 Oct 2016	AAMVA	Initial release.
1.0.2	25 Jan 2017	AAMVA	Updates after FMCSA review