



State-to-State FAQ

1. What is the purpose of the State-to- State service?

Every state in the U.S. has a law that restricts a person from holding more than one driver's license. These laws have existed for many years and states have relied upon an applicant's self-attestation when signing their license application. With no ability to verify information (beyond what an individual voluntarily offers a licensing agency), there has not been a mechanism to confirm a person's identity and their driving history. To remedy this, states built the State-to-State Verification Service (S2S): An electronic tool that allows states to determine whether an applicant already holds a license or ID card in another state.

2. Are states required to use the State-to- State service?

Driver licenses are state documents and as such, it is each state's prerogative to determine the standards and process they want to use in issuing them. In the case of a Commercial Driver's License (CDL), there are Federal standards that the states must meet as part of the issuance process. For non-CDLs, however, there is no federal standard, unless a state chooses to comply with the Federal REAL ID law.

For those states (i.e. states choosing to comply with REAL ID), the Department of Homeland Security has indicated that participation in S2S will be required for the state to be REAL ID compliant. This is because the Congressional Act requires states participating in REAL ID to ensure that a person holds only one REAL ID credential. S2S is the most effective means for states to comply with this federal requirement. In addition, the law and regulations governing REAL ID include requirements for state licensing agencies to connect their databases in a way that improves identity security as part of the licensing issuance process.

States that do not intend to comply with REAL ID can choose to participate in S2S to improve their licensing processes and leverage the benefits S2S provides. Benefits include improved customer service, fighting and reducing Identity fraud, process efficiency through increased automation of manual processes, and improved highway safety by identifying and eliminating potential duplicate licenses.

3. What type of platform/system is State-to-State?

S2S leverages an existing pointer system that allows the licensing systems of individual state agencies to “talk” to each other through a third-party proprietary technology platform. This platform is owned by the states, and is known as the Commercial Driver Licensing Information System (CDLIS). The state licensing agencies collaborated in the late 1980’s to develop CDLIS to meet new federal mandates of the 1986 Commercial Motor Vehicle Safety Act. These mandates required that states ensure professional drivers of large trucks and buses only hold one Commercial Driver License (CDL) and there only be one driving record. This record would follow the driver if they changed states and obtained a new license.

CDLIS is composed of a pointer index linked to state driver licensing systems. This allows states to check the pointer file for a match and then, if applicable, connect to the state that holds the record. CDLIS became operational on January 1, 1989 with California as its first participating state. All states have been using CDLIS since April 1, 1992.

S2S extends this platform beyond commercial drivers to all drivers and identity card holders to empower states to check with each other when issuing non-CDL licenses just as they have been able to with CDLs for many years. This reduces circumstances where people can hold more than one active driver’s license.

4. Have other technical solutions different than a pointer system been considered?

Yes. During the initial design phase of the S2S service, states evaluated five alternative designs. A four step process was used in developing a recommended REAL ID State-to-State Verification system design: (1) identify a wide range of design alternatives, (2) identify criteria to be used in evaluating the alternatives, (3) grade the alternatives based on comparative analyses of the alternatives against the criteria and, (4) use the grading as the basis to recommend a design.

Privacy organizations such as the Center for Democracy and Technology (CDT) and the American Civil Liberties Union (ACLU) were also consulted during the study. Barry Steinhardt, director of the technology and liberty program for the American Civil Liberties Union was quoted in a Washington Technology article dated January 10, 2008 saying "A pointer system is acceptable," and "We have said we have no objections to a pointer system."

The pointer system architecture was selected as the best solution to meet all selection criterion including privacy protection. The full report titled REAL ID STATE-TO-STATE VERIFICATION DESIGN ALTERNATIVES ANALYSIS was then distributed widely to several organizations and is currently available upon request to AAMVA.

5. What happens when a state discovers that a person has more than one license?

Currently, as states are joining S2S, when a duplicate license is discovered the states involved will collaborate to determine who holds the most recent record. Once that is determined, the old record is sunset and only the most current driver record is retained. If a customer visits an agency to apply for a license and the agency discovers a record already exists in another state, they will give the customer the option for continuing with their new application, in which case the state will request the state holding the record to transfer the record to the new state, or,

the customer can decline to move forward with their new application and retain their license in their previous state.

6. What information, including PII, is contained in a central location?

When the states designed S2S they chose to leverage the existing CDLIS platform in large part because the pointer index approach provides the greatest protection of privacy. Similar to an index at a library, the S2S pointer index contains the minimum amount of information needed to “point” the inquiring state to the jurisdiction that has the individual’s record. Each S2S pointer contains name, date of birth, license number, and the last five digits of a person’s Social Security Number (SSN). This information is used solely for inquiring states to locate the jurisdiction that holds the record.

7. Is SSN required or optional?

Yes SSN is required. However, the service does provide support for individuals who are not eligible for a SSN by allowing states to enter a substitute SSN.

8. Who owns and operates S2S?

The states own and operate S2S, through their association AAMVA (see AAMVA Background information below).

9. Does the federal government have access to the data through the S2S process?

No, in fact, the law that funded the development and initial deployment of S2S prohibits the use of funds to create any new means of Federal access to state driver information or any new Federal system of records based on state data. The S2S Service is owned and governed by the states that are participating States and they do not allow any Federal agency access to S2S.

10. Does it cost states money to participate in S2S?

Yes, following conclusion of the S2S pilot program (February 2017), states pay fees to participate in the service. The actual cost to an individual state is based on a combination of equal shared costs among all participating states and the size of the driver population in that state. These fees and how they are calculated are consistent with existing fees states pay for access to comparable services they rely on every day to protect their citizens from identity theft and fight against licensing fraud.

11. How to submit questions regarding S2S?

Questions regarding S2S can be submitted to Claire Jeffrey, Communications & Multimedia Manager, at cjeffrey@aamva.org.