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Report to the Mississippi Legislature

Review of the Department of Public Safety Driver Service Bureau's Management of Customer Service Delivery

PEER: The Mississippi Legislature's Oversight Agency

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December 16, 2019

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On December 16, 2019, the PEER Committee authorized release of the report titled *Review of the Department of Public Safety Driver Service Bureau's Management of Customer Service Delivery*.

A handwritten signature in black ink that reads "Becky Currie".

Representative Becky Currie, Chair

This report does not recommend increased funding or additional staff.

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Review of the Department of Public Safety Driver Service Bureau's Management of Customer Service Delivery

CONCLUSION: The Department of Public Safety (DPS) Driver Service Bureau suffers from inefficiencies driven by staffing shortages, changes in the technological and legal environment, and issues with kiosk services resulting in increased wait times for customers. Although the Bureau is filling examiner vacancies and improving the functionality of kiosks in order to lessen wait times at field offices, PEER recommends promoting online and kiosk services, improving the website, expanding appointments, utilizing management information from its new computer system to more efficiently allocate resources, exploring youth testing and licensing alternatives, and partnering with counties.

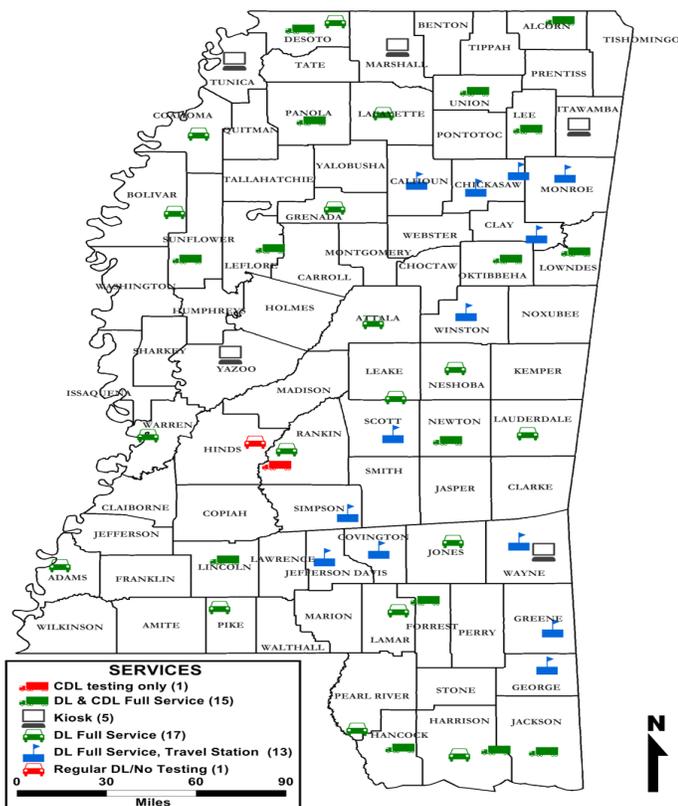
Background:

The Department of Public Safety's Driver Service Bureau issues drivers' licenses to persons who wish to drive the state's roads, commercial drivers' licenses to those who drive commercial vehicles, and identification cards to persons who require a form of identification for such transactions.

The Bureau maintains 34 permanent offices, which provide full services (i.e., drivers' testing, license renewals), and thirteen travel offices, which also provide full services, but are open only on a part-time basis. As of October 2019, the Bureau's field offices are staffed by 129 examiners.

Changes in federal and state laws have impacted the functions of the Bureau, and necessitated an upgrade in the Bureau's computer system. Upon becoming operational in the fall of 2018, the new system has contributed to increased customer wait times.

Exhibit 1: Driver Service Bureau Locations



Have wait times for customers increased at Driver Service Bureau field offices?

On average, customers' wait times to obtain drivers' licenses or ID card renewal services from Bureau field offices have tripled between FY 2017 and FY 2019.

For example, at the Gulport field office, average wait times increased from 11 minutes in FY 2017 to 1 hour and 33 minutes in FY 2019. In Jackson, at the Metrocenter field office, wait times increased from approximately an hour in FY 2017 to 2 hours and 20 minutes in FY 2019.

What are the primary causes for the increases in customer wait times at Bureau field offices?

There are varied reasons for the increases in customer wait times at the Bureau's field offices. Among these are an increase in the vacancy rate for examiner positions at the Bureau's field offices—which increased from 20% vacant positions in June, 2018 to 30% vacant positions in June, 2019. Additionally, issues associated with the development and implementation of the Bureau's new computer system have impacted wait times, specifically trouble interfacing with federal and out-of-state databases for some transactions, and issues with data migration and retention from the old computer system.

Other challenges of the new computer system include its demanding documentation features (born out of necessity to comply with federal mandates) that lessens examiners' flexibility in processing transactions and contributes to increased wait times. Further, the training necessary to operate the new computer system and changing documentation requirements have challenged the Bureau's examiners and impacted wait times. Finally, processing times for routine transactions (i.e., driver's license, ID card, and CDL renewals) have increased 40% to 50% since implementation of the new computer system. While no single factor is overwhelmingly significant, when taken together, all contribute to increased times customers must wait.

Are there tangential factors that have prevented customers from receiving timely service?

The Bureau maintains 11 kiosks installed at 9 locations through the state and 5 stand-alone kiosks at county courthouses. However, problems with functionality, such as error messages that do not explain the nature of the error, and difficulty in accepting addresses input by customers inhibit the kiosks' usefulness. Further, incomplete or missing information on the DSB website affects the website's utility and impedes drivers from receiving timely services. For example, the DSB website contained an outdated application that would not be accepted at Bureau field offices, thus increasing wait times as customers filled out the correct form at the counter. The website does not publish an up-to-date location list and phone numbers for each field office, and does not inform customers of REAL ID requirements (i.e., documents required to obtain the new gold star license that the Bureau has issued since January 2019).

Due to staffing shortages, the Bureau closes as many as 5 field offices per day, which prevents customers from receiving timely services. In offices with only two examiners, if an examiner is sick or giving a road test, the office must temporarily close, or close for the full day inhibiting drivers from receiving services.

Finally, incomplete or inaccurate information provided by Bureau examiner staff impacts a customer's ability to provide required documentation needed to complete transactions. Posing as a customer, PEER asked each DPS district headquarter office what documentation is required to change a maiden surname to a married surname on a driver's license. Nine headquarter offices told the "customer" to provide proof of marriage, while only one examiner described the three documents required to complete such a transaction.

Can other states' driver customer service delivery models provide solutions for Mississippi's wait time issues?

Contiguous states (i.e., Alabama, Arkansas, Louisiana, and Tennessee) provide potential solutions to Mississippi's increased wait time issues in two categories: face-to-face office services and online services.

Face-to-face office service solutions reveal a trend of the contiguous states' departments of public safety or state police partnering with counties to offer driver services in Tennessee, while Alabama and Arkansas partner with another state agency to assist in service delivery. In addition to these inter- and intra-governmental partnerships, Louisiana trains and certifies private driving academies to administer road skills tests (the only option for such tests in Louisiana). Contiguous states' driver service delivery models provide local services in all counties and parishes except in Tennessee which has offices in 70 of its 95 counties. In contrast, the DSB has service offices in 43, or approximately half, of Mississippi's 82 counties.

While Mississippi and all other contiguous states offer license and ID card renewals, CDL medical certification submissions, and driving history records requests online, some of the contiguous states also offer services unavailable in Mississippi including the ability to change an address, pre-register for new licenses and ID cards, obtain graduated licenses, and schedule regular road skills tests.

What actions have been or could be taken to address customer wait time issues?

Actions taken by DPS to improve issues with customer wait times:

- Filling vacant examiner positions;
- Implementing appointment scheduling for license renewals in 6 offices and weekend testing for youth drivers on a limited basis; and
- Providing new kiosks and increased kiosk functionality to reduce the number of failed transactions.

DPS should analyze the use of local county offices, such as tax collectors, which already process motor vehicle tag registrations, and county clerks to provide renewal of drivers' licenses and ID cards.

DPS should consider other options to improve issues with customer wait times:

DPS should consider implementing a home or school-based online testing protocol for youth drivers and certifying and accepting results from school-based driver education instructors as proof of mastering driving skills, if feasible. Additionally, DPS should allow young eligible drivers to obtain graduated licenses through the online portal when restrictions are removed as young drivers age.

Further, the Bureau should utilize its new computer system to provide management information that can enhance efficient operations of the bureau by examining the types of services requested to determine if fast service queues are appropriate, analyzing examiners' workloads to determine which offices require additional staffing, potentially closing infrequently-used offices and reallocating those resources to busier offices, and finally, analyzing supervisor workloads to allocate them to field offices in a more equitable manner.

DPS can improve website information by posting all field office telephone numbers, ensuring it maintains accurate information and forms online, posting the location of field offices and kiosks, and promoting online portal and self-service kiosks. Finally, DPS should consider expanding appointment scheduling to include road test appointments for obtaining new drivers' licenses.

Review of the Department of Public Safety Driver Service Bureau's Management of Customer Service Delivery

Introduction

Authority

The PEER Committee authorized a review of the Department of Public Safety's Driver Service Bureau due to significant delays in customer service delivery. The Committee acted in accordance with MISS. CODE ANN. Section 5-3-51 et seq. (1972).

Scope and Purpose

In conducting this review, PEER sought to address the following questions:

- Have wait times for customers increased at Driver Service Bureau field offices?
- What are the primary causes for the increases in customer wait times at Driver Service Bureau field offices?
- Are there tangential factors that have prevented customers from receiving timely service?
- Can other states' driver customer service delivery models provide solutions for Mississippi's wait time issues?
- What actions should be taken to address the customer wait time issues?

Method

In conducting fieldwork, PEER:

- interviewed Driver Service Bureau personnel and other agency personnel regarding the functions, staffing, responsibilities of the bureau, and the operations of the new computer system;
- reviewed and analyzed the Driver Service Bureau's organization, staffing, and operations;

- reviewed and analyzed the State Personnel Board's Driver Service Bureau staffing data;
- reviewed and analyzed Department of Public Safety and Department of Information Technology Services documents related to the procurement and implementation of the Driver-360 computer system;
- interviewed Department of Information Technology Services staff regarding the procurement and implementation of the Driver-360 computer system;
- observed Driver Service Bureau operations at the Jackson headquarters office and the Brookhaven district office and conducted a nine-district telephone survey;
- reviewed and analyzed content of the Department of Public Safety and Driver Service Bureau's websites through which services are provided to customers;
- reviewed information from contiguous states' websites regarding the delivery of driver services to their customers; and,
- reviewed and analyzed state and federal laws pertinent to the functions of the Driver Service Bureau.

Background

During the first decades of the twentieth century, states began to take steps to address the challenges posed by a new form of personal transportation, the automobile. Traffic laws, including speed limits, were established during this period, as well as automobile registration. Part and parcel of this regulation was the licensing of drivers. California became the first state to require drivers' licenses in 1913, and drivers' examinations in 1927. However, it took several decades for drivers' licenses and tests to be adopted by all states. In 1930, only 24 states required a license to drive a car and just 15 states had mandatory driver's exams.

In 1938, Mississippi joined these states by enacting Chapter 143, *Laws of 1938*, requiring that Mississippi drivers be licensed and take an examination containing at least ten questions testing the applicants' knowledge of driving. This act additionally created the Department of Public Safety and the Mississippi Highway Patrol. The Commissioner of the newly created Department of Public Safety was given the responsibility of licensing and examining drivers, and for appointing persons who could assist in the process.

This chapter addresses the:

- Department of Public Safety's Driver Service Bureau; and,
- complex environment of driver services.

Department of Public Safety's Driver Service Bureau

The Department of Public Safety's Driver Service Bureau issues drivers' licenses to persons who wish to drive on the state's roads and highways and those who drive commercial vehicles. The Driver Service Bureau also issues identification cards to persons who require a form of identification for transactions that require such. Additionally, the Driver Service Bureau is responsible for keeping drivers' records.

At present, the Department of Public Safety (DPS), working through its Driver Service Bureau (the Bureau), is responsible for issuing a vast array of credentials and processing other requests related to driving as well as some transactions that have no relation to driving, such as the issuance of concealed handgun carry permits and re-registering sex offenders. See Appendix A, page 34, for a list of all transactions that the Bureau centrally processes and that examiners must process in each of the field offices.

Types of Driver Service Bureau Field Offices

Presently, the Bureau renders services through an array of offices located throughout the state, as detailed below:

- thirty-four permanent offices, which provide full services—e.g., drivers’ testing, license renewals, permit processing—and are open on a full-time basis; and,
- thirteen travel offices, which also provide full services but are open on a part-time basis—e.g., typically only open one day per month in a designated location.

The permanent and travel offices are located in either state-owned buildings, leased buildings, or facilities owned by counties, and made available to the Bureau. At present, the Bureau has offices in 43 of Mississippi’s 82 counties, with some counties having more than one type of office. See Exhibit 1, page 5, for the location of the offices and the types of services rendered in each office. Since 2013, the Bureau has opened or closed driver services offices with the Bureau currently having five fewer field offices than in 2013.

Driver’s License Services Offered in Field Offices

The primary responsibilities of the Bureau’s field offices are to test drivers for their initial license and / or to renew drivers’ licenses. The two primary types of licenses processed by the field offices are a regular personal vehicle driver’s license and a commercial driver’s license (CDL). As shown in Exhibit 1, page 5, the Bureau provides these services through:

- seventeen full-service offices that offer regular driver license testing only;
- fifteen full-service offices that offer both regular and CDL driver license testing;
- thirteen full-service part-time travel offices that offer regular driver license testing services only;
- one office that offers CDL testing only; and,
- one office that offers regular driver license services only excluding testing.

Because all Bureau offices are full-service, there are no offices offering renewal services only, which is the service typically needed by individuals holding a regular license.

Exhibit 1: Driver Service Bureau Locations, October 2019

County Offices:

- Adams – 1
- Alcorn – 1
- Attala – 1
- Bolivar – 1
- Calhoun – 1
- Chickasaw – 2
- Clay – 1
- Coahoma – 1
- Covington – 1
- DeSoto – 2
- Forrest – 1
- George – 1
- Greene – 1
- Grenada – 1
- Hancock – 1
- Harrison – 2
- Hinds – 1
- Jackson – 1
- Jefferson
- Davis – 1
- Jones – 1
- Lafayette – 1
- Lamar – 1
- Lauderdale – 1
- Leake – 1
- Lee – 1
- Leflore – 1
- Lincoln – 1
- Lowndes – 1
- Monroe – 1
- Neshoba – 1
- Newton – 1
- Oktibbeha – 1
- Panola – 1
- Pearl River – 1
- Pike – 1
- Rankin – 2
- Scott – 1
- Simpson – 1
- Sunflower – 1
- Union – 1
- Warren – 1
- Wayne – 1
- Winston – 1



DL Full Service:

- Clarksdale
- Cleveland
- Grenada
- Gulfport
- Hattiesburg West
- Kosciusko
- Laurel
- Meridian
- Natchez
- Olive Branch
- Oxford
- Pearl
- Philadelphia
- Picayune
- Summit
- Vicksburg
- Walnut Grove



DL & CDL Full Service:

- Batesville
- Biloxi
- Brookhaven
- Columbus
- Corinth
- Gautier
- Greenwood
- Hattiesburg
- Indianola
- Kiln
- Nesbit
- New Albany
- Newton
- Starkville
- Tupelo



DL Full Service, Travel Station:

- Amory
- Collins
- Forest
- Houston
- Leakesville
- Louisville
- Lucedale
- Magee
- Okolona
- Pittsboro
- Prentiss
- Waynesboro
- West Point



Regular DL/No Testing:

- Jackson (Headquarters)



CDL Testing Only:

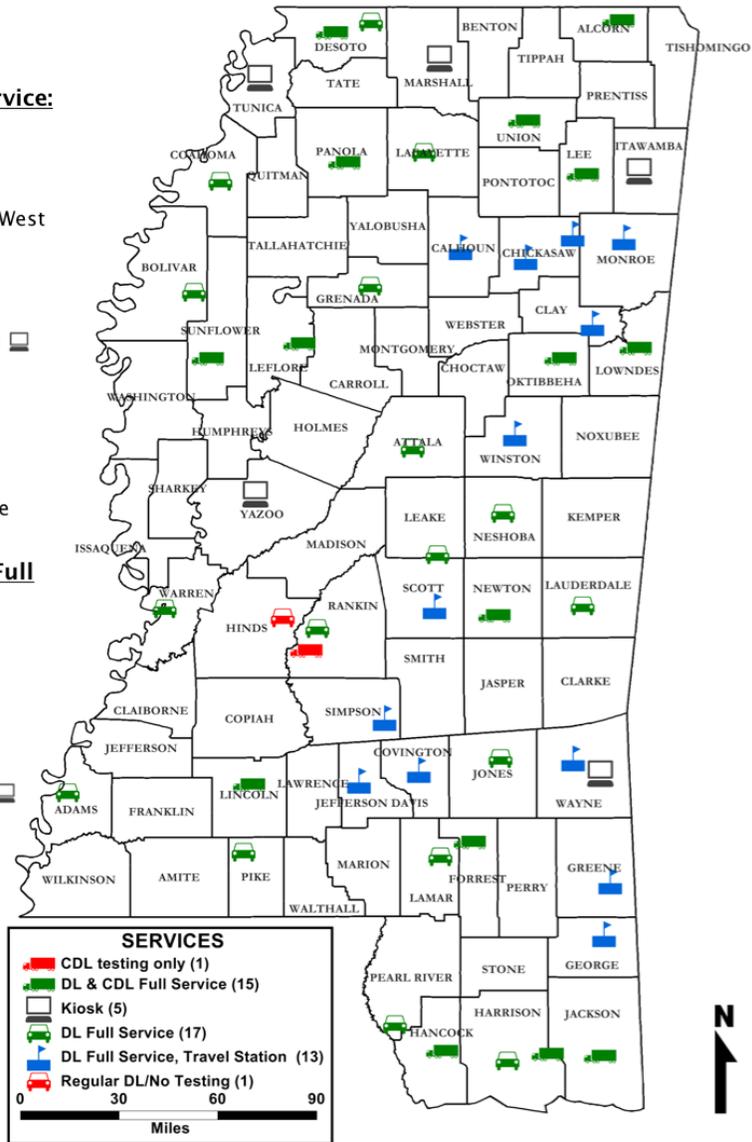
- Richland



Kiosk Service Only:

- Fulton - Itawamba
- Holly Springs - Marshall
- Tunica - Tunica
- Waynesboro - Wayne
- Yazoo City - Yazoo

Denotes offices with a kiosk(s)



SOURCE: PEER created from information provided by the Department of Public Safety, October 2019.

Staffing and Management of the Field Offices

As of October 2019, the Bureau staffed its field offices with 129 examiners who comprise the primary workforce and provide driver services offered by the Bureau. During the review period, PEER noted that the Driver Service Bureau hired eight examiners, going from 121 positions to 129.

To offset transaction processing times, reduce customer wait times, and manage crowd control to avoid problems and comply with mandatory fire codes, the Driver Service Bureau hires contractual “greeters” at an hourly rate of \$12.00 per hour. “Greeters” ensure customers have accurate and sufficient documentation prior to them receiving counter service and prevent them from having to return to a service office. The Driver Service Bureau suggests the hiring of a greeter at permanent stations that employ four or more examiners. As of October 21, 2019, 19 of 34 permanent offices had 21 greeters assigned and the Driver Service Bureau is requesting an additional 25 greeters at select offices.

All of the Bureau’s field offices are located organizationally within the Department of Public Safety’s (DPS) three service regions and nine trooper districts. Each service region is managed by a lieutenant—i.e., trooper—classified as a region supervisor who must possess two years of supervisory experience. The nine trooper districts are managed by 14 Master Sergeants who must only possess work experience as a trooper within DPS’s Highway Patrol Division. DPS staff contends that Master Sergeants are carefully selected during a rigorous recruitment process and adequately trained to manage driver service offices, although minimum qualifications do not require any specific driver service or supervisory experience.

Presently, there are no civilian managers of the Bureau’s field offices. However, on June 5, 2019, the State Personnel Board approved the reallocation of Bureau positions to Branch Director II supervisory positions. The positions have a special qualification: applicants must possess five years of experience within the Driver Service Bureau. The Branch Director positions, which presumably will be filled by civilians, will support the sworn officers who manage the Bureau’s field offices. To date, the Bureau has not filled these positions.

Options Other Than Field Offices to Obtain a License

In an effort to provide convenient options to individuals who need a driver’s license, DPS allows the use of the Internet, automated kiosks, and the U.S. Mail for the receipt of a license.

- *Department of Public Safety Internet Portal and Driver Service Bureau Website:* Through an Internet browser, individuals may perform the following tasks:
 - renew a regular driver’s license or identification card;

- request a duplicate regular driver's license or identification card;
- pay a reinstatement fee;
- schedule a CDL road test;
- submit a medical certification necessary for a CDL;
- request a record of driving history; and,
- request a driver's license manual.

Furthermore, persons may access the Department of Public Safety's website through the portal and review the answers to frequently asked questions. The Driver Service Bureau website provides additional information relevant to the services they provide and a link to online services on the DPS portal.

- *Automated Kiosks:* Driver Service Bureau has 11 automated kiosks¹ at nine locations throughout the state. There are five stand-alone kiosks in courthouses in Itawamba, Marshall, Tunica, Wayne, and Yazoo counties. (See map on page 5.) Kiosks provide self-service capabilities for citizens requiring replacement or renewal of licenses. Kiosks can take new license pictures, but users may not update their name, and other identifying information.
- *Mail-in applications:* The Driver Service Bureau also processes applications for concealed carry permits, which may be submitted by mail.

Complex Environment of Driver Services

Considerable changes in federal and state laws have impacted the functions of the Department of Public Safety's Driver Service Bureau. These changes require Bureau staff to be familiar with a broad range of legal mandates and databases that need to be applied or reviewed when making decisions ranging from the credentialing of a customer to performing functions related to the implementation of the Federal Motor Voter Law. New federal requirements for drivers' licenses and commercial drivers' licenses mandate a high level of security and accuracy from the state agents who process and issue these credentials.

Over the past decades, the legal environment in which driver licensing occurs has become much more complex. Drivers' licenses are no longer simply evidence of competence to drive an automobile. Flying commercially requires the passenger to show proof of identification with a driver's license or passport in order to board the aircraft. Drivers' licenses are also a favored form of identification for persons who would wish to enter secure locations, such as military bases or nuclear power plants. Therefore, so that persons examining these forms of identification can rely on their accuracy, states have a considerable burden placed on them to ensure the information contained in driver licenses or ID cards is correct, and that the person presenting the

¹ A kiosk is a small, stand-alone booth with a computer terminal featuring specialized hardware and software that provides access to information and applications for communication, commerce, entertainment, or education.

identification is eligible to hold the document. Additionally, the staff assigned to process applications for drivers' licenses have a more extensive set of duties today regarding the management of drivers' records as well as other functions that have been assigned them by state and federal governments.

Major Federal Mandates

Several federal mandates enacted over the past 25 years have had an impact on the responsibilities of the Mississippi Driver Service Bureau regarding the issuance of credentials for licenses and identification cards.

The National Voter Registration Act²

The so-called "motor-voter" act requires states to establish voter registration procedures for federal elections so that eligible citizens might apply to register to vote (1) simultaneously while applying for a driver's license, (2) by mail, and (3) at selected state and local offices that serve the public. The law, adopted in 1993, took effect on January 1, 1995, for most states. In Mississippi, this requirement impacts voter rolls for all elections.

With respect to simultaneous applications for voter registration and applications for a driver's license, the law covered new applications, renewals, and changes in address for drivers' licenses. Under the law, an application for a driver's license also served as an application for voter registration for federal elections, unless the applicant failed to sign the voter registration application. The voter registration application form was to be a part of the motor vehicle license application form. The form could ask for information necessary to prevent duplicate registrations and to enable state election officials to determine the eligibility of the applicant and to administer voter registration laws. Furthermore, the law required that the form include a statement that listed each eligibility requirement (including citizenship), contained an attestation that applicants meet each requirement, and required the signature of the applicants under penalty of perjury. The form also had to include a statement about penalties for the submission of a false voter registration application and a statement that information about either the declination or the office where the citizen registered would remain confidential.³

When persons present themselves before a Department of Public Safety driver's license examiner, the examiner must work with the applicant to review and understand the "motor-voter" application if the applicant chooses to complete the form.

² 42 U.S.C. §1973gg et seq.

³ Royce Crocker, *The National Voter Registration Act of 1993: History, Implementation, and Effects*, Congressional Research Service, September 18, 2013.

REAL ID Act of 2005

Adopted in response to the terrorist attacks on the World Trade Center and the Pentagon in 2001, the REAL ID Act sets stringent requirements on the issuance of drivers' licenses and identification cards. States must adopt stringent standards for the issuance of these credentials if they are to be recognized by federal agencies for official purposes. Such purposes include: accessing federal facilities, boarding federally regulated commercial aircraft, entering nuclear power plants, and any other purposes that the Secretary of Homeland Security shall determine.

To be compliant, states must require an applicant to present: (1) a photo identification document or a non-photo document containing both the individual's full legal name and date of birth; (2) date of birth; (3) proof of a social security number (SSN) or verification of the individual's ineligibility for a SSN; and (4) name and address of the individual's principal residence.

The REAL ID Act also requires states to:

- verify the applicant's legal status;
- sets standards for issuance and verification of documentation for temporary permits and licenses;
- retain digital or paper copies of required documentation;
- establish mandatory facial image requirements;
- establish procedures for verification of information on renewal applications;
- establish procedures for confirming Social Security Account numbers;
- determine if applicants have licenses or ID cards issued in other states;
- establish security over equipment and facilities where licenses and IDs are produced;
- require screening of personnel who produce licenses and ID cards;
- provide training to staff who must recognize fraudulent identification documents;
- limit a license or ID card's period of validity to no more than eight years; and,

- require states not issuing licenses or ID cards in compliance with the REAL ID Act to clearly identify such as being non-compliant.⁴

Commercial Drivers' Licensing Safety Regulations

When the states issue commercial drivers' licenses (CDL), they operate within a complex federal regulatory environment wherein persons operating commercial vehicles in interstate commerce must be licensed in accordance with federal standards. These standards are promulgated by the Federal Motor Carrier Safety Administration, a part of the United States Department of Transportation.⁵

Most significantly, states must have a system to check a national database for drivers' records on license applications to ensure that the applicant has not been disqualified in another jurisdiction or that the applicant is not licensed elsewhere. CDL holders are not allowed to have licenses from multiple jurisdictions. Records checks require that states check drivers' records in all states where the applicant was licensed back 10 years. States must also verify medical records on applicants. To facilitate these functions, states must be connected to the CDL Information System and the National Driver Register in order to exchange pertinent information regarding the license status of drivers' and their driver records. Certain driving offenses, such as alcohol and drug related matters, disqualify drivers from obtaining a license. States must also have a skills-based testing process and prepare CDL manuals for applicants. (See Subpart G and H of 49 CFR Part 383.)

Mississippi Licensing and Vehicular Mandates

While federal mandates have made the driver services environment more complex and demanding, several changes in state law have had similar effects on the responsibilities of Bureau staff. These state mandates touch upon several topics including the taking of applications for gun permits to registering sex offenders. In addition to federal mandates, the state has also enacted laws that place requirements on the Department of Public Safety to collect information that is managed through the Driver Service Bureau databases.

Sex Offender Registration

MISS. CODE ANN. Section 45-33-21 et seq. (1972) requires the registration of persons adjudicated guilty of committing certain sex offenses. The registration requires that they keep law enforcement officials apprised of their address, employment, or school registration. Although original full registration of sex offenders occurs at local sheriff's offices, the Department of Public Safety is responsible for keeping this data up-to-date so that local law enforcement and the public can be knowledgeable of the

⁴ Michael John Garcia, Margaret Mikyung Lee, and Todd Tatelman, *Immigration: Analysis of the Major Provisions of the REAL ID Act of 2005*, Congressional Research Service, May 25, 2005.

⁵ See 49 U.S.C. § 113.

whereabouts of such offenders. This mandate was enacted in 2000.⁶

Concealed Carry Licenses

MISS. CODE ANN. Section 45-9-101 (1972) provides for the issuance of concealed carry licenses. Prior to the issuance of these licenses, the Department of Public Safety must complete a criminal record check on the applicant before issuing such licenses. The Driver Service Bureau runs these checks.

Financial Responsibility

MISS. CODE ANN. Section 63-16-3 (1972) requires the Department of Public Safety to maintain a common carrier-based motor vehicle insurance verification system to verify the compliance of a motor vehicle with motor vehicle liability policy requirements under the Mississippi Motor Vehicle Safety-Responsibility Law. This system must be regularly updated and able to distinguish between vehicles that must be insured as opposed to those that are exempt or covered by legally authorized bond or self-insurance. The system must be accessible 24 hours a day, seven days a week.

Driver's History

Growing concern over the safety of drivers has made it necessary to keep accurate and comprehensive records of a driver's history. The commission of certain offenses requires administrative action to suspend or revoke a driver's license. Under such conditions, it is imperative that the Department of Public Safety, the only state agency with the administrative authority to suspend or revoke a driver's license, have accurate information upon which to make a decision [See Section MISS. CODE ANN. 63-1-53.(1972)].

These new mandates have required Departmental managers to develop information systems far more complex than methods or systems that were used decades ago for keeping records of licensed drivers.

Technological Changes to the Licensure Environment

Changes in the legal environment have impacted the operational and technological environment in which the Bureau's staff must function. New federal mandates, particularly the REAL ID Act and changes to commercial drivers' licensing regulations of the United States Department of Transportation, require that the Bureau's staff document that applicants meet certain requirements set out in law as preconditions to the issuance of a driver's license or identification card. The Department must ensure the security and accuracy of its issuance procedures to comply with the increasingly demanding requirements of federal law.

⁶ Chapter 499, *Laws of 2000*.

To work effectively in the complex modern legal environment, the Department of Public Safety embarked on the development and implementation of a new drivers' licensing and records computer system.

The Driver-360 System has been in development since 2011. For a description of the development and implementation of the Driver-360 system, see Appendix B, page 36.

When posed with the possibility of upgrading the current system, DPS managers and planners examined the complexities of the environment and decided that the implementation of an integrated system to manage the issuance of licenses (credentialing) and driver records would be the most beneficial. These managers appreciated the fact that the older systems were fast becoming obsolete, and might soon not be supportable. Additionally, modern information management strategies are rapidly moving away from mainframe applications, such as those that were critical to running older Driver Service Bureau software.

The new system would enable the department to effectively function in the new environment. Noteworthy in the DPS planning process was the goal of making the new system capable of efficiently managing complex transactions while addressing the customer's desire for efficient disposition of business. The DPS planners made it a goal to provide for separate processing for simpler transactions, such as renewals of drivers' licenses and identification cards, and to enhance the usefulness and functionality of online services and kiosks for these functions.

While delays occurred in the implementation of the new system, the system became operational in all Driver Service Bureau field offices in the fall of 2018. At this time, it became apparent that the system was not providing the efficient services that DPS wanted as wait times for customers increased.

Have Wait Times for Customers Increased at Driver Service Bureau Field Offices?

In early 2019, state and national news organizations began running stories regarding wait times at the Driver Service Bureau's field offices. The Associated Press stated that "getting a new driver's license in Mississippi can be a multiday ordeal with long lines at Department of Public Safety stations that are short-staffed⁷." Other media stories included interviews with drivers who stated that they waited two hours outside a field office before they could get inside to take a number to get into the queue to be served, only to be told to leave the office because the line was too long⁸. One story described how drivers in the Jackson-metro area often drove an hour or more to seek shorter lines in smaller towns⁷.

The wait time issue caught the attention of state legislators. During a 2019 Senate appropriations subcommittee meeting, a Senator stated that "four-hour wait times are flat-out unacceptable for citizens of Mississippi. Something has to change. I've heard of people coming in to say they just need to change their address and they're told come back in six hours." The DPS Commissioner acknowledged that he has been aware of the wait time issue since he assumed control of the agency in early 2017 and has monitored some of the field offices and interacted with drivers attempting to receive services.

In light of the public's concerns regarding the wait time issue, PEER sought to determine whether the issue is a recent phenomenon or one that has existed in the past.

Customer Wait Times at Driver Service Bureau Field Offices

On average, customers' wait times to obtain driver's license or ID card renewal services from Bureau field offices have tripled between FY 2017 and FY 2019.

To analyze whether the timeliness of services has declined at the Bureau's field offices, PEER obtained information from the Driver Service Bureau regarding the amount of time customers had to wait at a field office to renew a non-commercial driver's license or identification card during fiscal years 2017 through 2019. (PEER chose to analyze the wait times for renewal services because those are the typical services required by customers at the Bureau's field offices.)

Although PEER reviewed the wait time for all of the Bureau's 47 field offices, Exhibit 2, page 14, presents the average wait times

⁷ Emily Wagster. "Mississippi Driver's License Process: Long Lines, Long Wait." *U.S. News & World Report*. 23 March 2019.

⁸ Bob Bakken. "Supervisors Air Concerns About License Stations." *Desoto Times-Tribune*. 27 June 2019.

over a three-year period for the Bureau’s ten busiest field offices. As shown in Exhibit 2, below, the wait times at those field offices were relatively short during FY 2017, with customers who used the Gulfport field office having to wait only an average of 11 minutes to renew a driver’s license or ID card. On the other extreme, the exhibit also shows that customers who used the Bureau’s Jackson Metrocenter field office had to wait approximately an hour in FY 2017 for renewal services, with the wait time increasing to at least 2 hours and 20 minutes in FY 2019.

While Exhibit 2 does not illustrate the significant wait times featured in media accounts, the exhibit confirms that wait times for the Bureau’s renewal services became progressively longer at the ten busiest field offices over the three-year period. As shown in Exhibit 2, the wait times for some of the offices improved during September 2019, while others declined quite significantly.

Exhibit 2: Average Wait Times at Selected Driver Service Bureau Field Offices⁹

Office	FY 2017 Average	FY 2018 Average	FY 2019 Average	September 2019 Average
Jackson HQ	0:34	1:04	1:42	1:30
Tupelo	0:24	0:52	1:33	1:08
Gautier	0:14	0:25	1:34	1:21
Jackson Metro	0:51	1:36	2:20	**
Hattiesburg	0:24	0:44	0:56	1:17
Nesbit	0:13	0:23	1:16	2:04
Gulfport	0:11	0:46	1:33	1:23
Pearl Troop C	0:46	1:36	1:55	1:06
Biloxi	0:34	1:07	1:44	1:03
Olive Branch	0:12	0:15	1:00	1:52

** The office was closed due to lease cancellation.

NOTE: Data is shown in hours and minutes.

SOURCE: PEER analysis of DPS Driver Service Bureau data.

⁹ Wait times do not reflect the length of time a customer has waited prior to logging in or signing into NEMO-Q (the Bureau’s customer queuing system) after receiving permission from staff.

What are the Primary Causes for the Increases in Customer Wait Times at Bureau Field Offices?

PEER determined that the increase in customer wait times at the Bureau's field offices have been influenced by staffing shortages, computer system operational issues, ongoing system development and training, and lack of staff familiarity with the new computer system.

Driver Service Bureau Position Vacancies

From FY 2018 to FY 2019, the Driver Service Bureau experienced a significant vacancy rate within the driver license examiner positions assigned to provide services at field offices.

According to the Mississippi State Personnel Board (MSPB), a driver license examiner:

administers oral, written, and skill driver's license tests for the Department of Public Safety to applicants seeking a Class R or Class A, B, C, and D driver's license, learner's permit, identification card, or information for motor voter registration. Incumbents are also responsible for vision screening of applicants, renewing, and reinstating Mississippi driver's licenses.

After the FY 2020 authorized salary realignments, an examiner earns \$25,870.42 annually.

As shown in Exhibit 3, below, the Bureau had 20% of its examiner positions vacant on June 30, 2018. The percentage of vacant examiner positions increased to 30% by June 30, 2019, one year later.

Exhibit 3: Driver License Examiner Filled and Vacant Positions

Date	Total	Filled	Vacant	Percent Vacant
June 30, 2018	177	143	34	20%
June 30, 2019	178	125	53	30%

SOURCE: PEER analysis of Department of Public Safety personnel.

Thus, approximately one-third of the driver license examiner positions assigned to the Driver Service Bureau as of June 30, 2019, were vacant.

Driver Service Bureau's New Computer System

Issues associated with the development and implementation of the Driver Service Bureau's new computer system have impacted customer wait times.

The Department of Public Safety (DPS) began developing a new computer system—i.e., the Driver-360 System—in 2011. At its inception, the new computer system was designed to combine the Bureau's credentialing, records management, and access functions into an integrated system. In early Fall 2018, the system became operational at all Driver Service Bureau field offices.

Appendix B, page 36, provides a timeline of the development and implementation of the new computer system and describes the computer system-related challenges and delays that have impacted customer wait times.

As described below, DPS's Information Technology (IT) staff identified the following computer system-related issues that have impacted customer wait times.

- The system would either not print the required information on a driver's license or ID card properly, or the card would emerge damaged from the printer.
- In some cases, printers located in the field offices could not print new drivers' licenses or ID cards at all, requiring IT staff to troubleshoot and correct the problem on-site.
- The system must interface with federal and out-of-state databases for some transactions. For example, some transactions require the computer system to interface with the Social Security Administration's databases to confirm addresses. Additionally, a broad range of databases must be contacted for the issuance of alien or immigrant credentials or to identify any convictions imposed on a driver nationwide prior to the issuance of a CDL license. For some CDL transactions, the computer system must interface with out-of-state databases to ensure that the customer does not hold a driver's license in another state.
- Unique driver-related information maintained in the Bureau's former computer system—e.g., proof of birth or residency—did not always migrate to the new computer system upon implementation.
- The system could not efficiently process transactions related to a CDL—e.g., a driver downgrading to a regular driver's license because of health reasons, processing CDL

medical records cards, and adding or removing endorsements for CDLs.

- The new computer system requires rebooting or restarting on a frequent basis. While most computer systems periodically require a reboot, Driver Service Bureau customer transactions could not be processed while the new system was unavailable.

Driver-360 Documentation Features

The demanding documentation features of the new computer system lessen examiners' flexibility in processing transactions and impact customer wait times.

The Bureau's new Driver-360 system is a rules-based system that requires examiners' rigid compliance with documentation features of the system. In the bureau's older mainframe system, examiners could "skip" entering certain information into the system without impacting the processing of a transaction. For example, if a transaction required a customer to provide proof of address and the customer did not provide such documentation, the examiner could "skip" that particular step, thereby overriding the requirement for proof of address.

Primarily due to federal statutory mandates, such as REAL ID and CDL requirements imposed on states, the Bureau's new computer system does not provide examiners with processing flexibility—i.e., all required documentation for a transaction must be collected and entered into the system before the transaction can be completed. The federal mandates impose on states a difficult burden to have auditable systems that contain the documentation necessary to establish that a person is the individual who is eligible to apply for a state's credential, such as a driver's license or ID card.

Because of the increased documentation requirements, due primarily to federal mandates such as REAL ID, customers who do not bring the correct documentation to the Bureau's field offices for a new driver's license or ID card—e.g., a certified birth certificate or two forms of proof of domicile—will have to be sent away only to return to the office later with the appropriate documentation. Such customers become a part of the future workload at the Bureau's field office, which contributes to the number of persons at an office waiting to be served.

Examiners Face Challenges with Computer Training

Training necessary to operate the Bureau's new computer system and changing documentation requirements have challenged field office examiners and impacted customer wait times.

Conversion from an old computer system to a new computer system requires extensive training and diminishes the value of

veteran employees' institutional knowledge. While the contractor who developed the Bureau's new Driver-360 system prepared training plans, objectives, and materials, and the Bureau provided training to its examiners, the new system involves new processes and procedures to complete most transactions. While in the past, a Bureau examiner who had worked with the former computer system could serve as an experienced guide and mentor to new examiners, the Bureau's new system makes knowledge of the former system meaningless. In a December 2018 study conducted by Capgemini Consulting, 95% of the Driver Service Bureau examiners considered themselves to be proficient in the use of Driver-360, and only one in five considered themselves to be an expert of the system. Additionally, approximately 25% of the Bureau's examiners did not consider the contractor's training materials to be easy to understand and implement.

In addition to learning the intricacies of the new computer system, Bureau examiners are required not only to know the credentials and laws of Mississippi, but also to have knowledge of over 60 types of federally-issued immigrant registration papers and only issue a Mississippi credential after proper validation of each type of credential is received from the federal database. Examiners deal with constantly changing and evolving interfaces, legislation and policies, both for federal permits for non-citizen residency, but also Mississippi changes. For instance, the federally required Verification of Lawful Status has continually had new releases throughout the Driver-360 computer system deployment and requires changing procedures and examiner rules and processes. Additionally, the State Pointer Exchange Service (SPEXS), the database that examiners must access to determine if a person applying for a REAL ID has a license or ID in another jurisdiction, was installed on the new computer system on April 8, 2019, and required extensive training for the examiners to utilize this new required national verification service. Furthermore, fees and fee policies are constantly changing—e.g., the recently discontinued \$25 CDL application fee, the DUI Interlock fees, and the reinstatement fees for drug-related under-the-influence fees. Therefore, the Bureau examiners are required to constantly change what they already learned to do. This is not entirely the fault of the new computer system, but is a result of legislative changes, policy changes, or federally imposed requirements.

Processing Times for Routine Transactions

Processing times for routine transactions—i.e., driver's license, ID card, and CDL renewals—have increased 40% to 50% since implementation of the Bureau's new computer system.

For most transactions conducted at Bureau field offices, more time is needed to transact business through the new Driver-360 system than the older mainframe system. In addition, increased documentation and processing required under enhanced security standards carries with it a price. In this case, the price is increased

time necessary to process a transaction, which results in customers waiting longer to receive services.

PEER analysis of Driver Service Bureau data from FY 2016 through FY 2019 shows that the transaction processing time for driver's license and ID card renewals has increased from 7:28 minutes per transaction to 10:22 minutes per transaction, an approximate 40% increase in processing time. The transaction processing time for CDL license renewals increased from 9:42 minutes per transaction to 14:13 minutes per transaction, an approximate 50% increase in processing time.

As shown in Exhibit 4, below, processing times for other transactions handled by field office examiners have also increased following the implementation of the Bureau's new computer system.

Exhibit 4: Processing Times for Selected Transactions

Transaction Type	Average Time First Half of FY 2016	Average Time First Half of FY 2019
General Permit	7:46	9:52
Gun Permit Renewal	8:26	9:28
License Reinstatement	6:48	6:10
Motorcycle Permit	6:54	8:27

NOTE: Data is shown in minutes and seconds.

SOURCE: PEER analysis of DPS Driver Service Bureau data.

Driver Service Bureau staff contend that the new computer system was developed first and foremost to be compliant with various federal requirements for conducting secure transactions and not to facilitate rapid transactions. DPS planners and program managers knew that the former mainframe system could not provide the type of service required under more stringent federal requirements.

In summary, customer wait times for service have been impacted by a variety of factors. While no single factor is overwhelmingly significant, all contribute to increased times customers must wait.

Are There Tangential Factors That Have Prevented Customers from Receiving Timely Service?

While issues related to the implementation of the Bureau's Driver-360 system have had a noticeable impact on the amount of time Driver Service Bureau customers must wait in field offices, PEER notes that several other factors, which are not directly related to the new system, have contributed to customer wait times. These relate to the usefulness and functionality of kiosks and information provided on the Driver Service Bureau's website.

Limitations of Kiosks as an Alternative to Face-to-Face Interactions

Automated kiosks enable a person to renew a license without having to interact with Bureau field office examiners. However, problems with the functionality of kiosks inhibit their usefulness.

Kiosks are an automated dispenser of drivers' licenses from which a person may obtain a driver's license or identification card renewal. At present, the Driver Service Bureau has 11 kiosks installed at nine locations throughout the state and five stand-alone kiosks at county courthouses as shown in Exhibit 1 on page 5.

While kiosks can offer a fast, automated alternative to waiting for counter service, as described below, several factors make kiosks less than ideal service substitutes.

- **Information regarding a customer must be entered exactly as it appears on the customer's driver's license:** The technology supporting a kiosk requires that the information entered by the customer match exactly the information included in DPS's database. Thus, the system cannot recognize the slightest variation in information and any variance will produce an error message. For example, if a customer's address is recorded in the database as 1234 *Hwy. 49 South* and the customer entered 1234 *Highway 49 S*, the kiosk would experience an error and the transaction would be aborted automatically.
- **Error codes are not meaningful:** As described above, incorrect information entered into a kiosk will result in an error with the customer receiving an error message on a slip of paper. However, the error message does not delineate the reasons for the error. As a result, a customer has no means of knowing what information needs to be corrected or what steps need to be taken so that another transaction may be attempted immediately. Without the kiosk providing helpful information to avoid an aborted transaction, a customer would have to resort to face-to-face interaction with a field office examiner.
- **Kiosks produce a printed receipt but not an actual driver's license:** At the conclusion of a transaction, a customer who uses a kiosk will receive a printed receipt that is to serve as the customer's driver's license until such time as DPS mails the customer a new driver's license

card. According to Bureau staff, customers tend to not use a kiosk because they typically prefer to receive an actual driver’s license or ID card at the conclusion of the transaction and not a paper receipt.

- **Kiosks only accept two types of payments:** As kiosks are programmed presently, they only accept a Visa (credit only) or MasterCard (credit or debit) as a form of payment. The kiosks will not accept any other form of payment, specifically other types of credit cards, such as Discover or American Express. This limitation inhibits the usefulness to users, particularly if they would prefer to use other types of debit cards. Recently, DPS began accepting all major branded credit and debit cards.

PEER analyzed customers’ use of kiosks during two months—i.e., April 2018 and April 2019. As shown in Exhibit 5, below, customers attempting to use a kiosk to renew a driver’s license were not very successful—i.e., 76% and 69% of the transactions were either cancelled or failed during the two months.

Exhibit 5: Results of Customers’ Use of Kiosks

	April 2018	Percent of Total	April 2019	Percent of Total
Successful	1,777	24%	3,030	31%
Cancelled	1,764	24%	2,265	23%
Failed	3,878	52%	4,618	46%
Total	7,419	100%	9,913	100%

SOURCE: PEER analysis of DPS Driver Service Bureau data.

Utility of the Department’s Website Information

Incomplete or missing information on the Department of Public Safety’s website affects its utility and impedes a driver’s ability to receive timely services.

As with most state agencies, the Department of Public Safety maintains a website to provide the public with pertinent information regarding its divisions, including the Driver Service Bureau. Given the serious complaints and concerns regarding customer wait times at Bureau field offices, PEER reviewed the Driver Service Bureau information on the website to determine how informed a customer could be prior to attempting to receive services from Bureau staff.

While Driver Service Bureau staff have made improvements to the department website information while PEER was conducting fieldwork for the project, the website had deficiencies that affected its utility. For example, PEER observed two applications on the website for a driver’s license, one of which was required of an underage driver and one for an adult driver, which is no longer accepted in field offices. The underage

driver application was actually the only application that would be accepted in the field office for any driver, but was not labeled indicating that it could be used by an adult driver. Had an adult driver completed the old adult application prior to going to a field office, the driver would have had to complete the correct application on site, possibly at the counter with examiner assistance, thereby exacerbating wait times and interrupting work flow. The Driver Service Bureau recently updated its website to only include the accepted and clearly labeled application to be used by all drivers.

Until recently, the website also did not include sufficient information to inform drivers of REAL ID requirements—i.e., documents required by federal law to prove a driver's identity or a picture of the new gold star license they have issued since January 2019. The Driver Service Bureau also took down their Frequently Asked Questions (FAQ) page while PEER was conducting fieldwork.

The website did not include an accurate listing of all field office locations and the types of services that could be rendered at each location. The Driver Service Bureau has since updated its website with the exception that a new permanent office still reflects travel office operating hours.

In addition, the website does not include telephone numbers for each of the Bureau's field offices. There is only one number listed for each district headquarters.

PEER observed a user did not receive a reply to questions for help entered in the website's "Questions and Comments?" feature.

Finally, the website does not prominently promote the Bureau's online renewal option or the use of kiosks located in field offices. Although the Bureau's website homepage states the location of kiosk services is accessible on the site, there is no link to the information; if a user searches for "kiosk" in the site's search bar, it navigates to a blank page entitled, "License Renewal Kiosk Locations."

Conflicting and Inaccurate Information Provided by Examiners

Incomplete or inaccurate information provided by Driver Service Bureau examiner staff impacts a customer's ability to provide required documentation to complete transactions and impedes a driver's ability to receive timely services.

To test the completeness and accuracy of information provided by field office examiners to customers, PEER contacted the main field office in each of DPS's nine troop districts. Posing as a customer, PEER asked each office: *what documentation is needed to change a maiden surname on a driver's license to a married surname?* Examiners in each of the nine field offices told the 'customer' to provide proof of marriage, while an examiner in only one of the nine field offices described to the 'customer' the three documents that are required to affect a surname change on a driver's license—i.e., a Social Security card showing the new married surname, marriage license/certificate, and the customer's current driver's license. Failure to be informed and be able to provide all three documents upon

arrival at a field office would prevent a customer from being successful in changing a surname on a driver's license.

PEER's telephone survey also involved calling one field office at different times during the workday. During those calls, PEER observed that different examiners answered the telephone call each time. Because all calls intended for all field offices within each of the nine districts are routed to the main office, examiners' workflow is interrupted as they answer the telephone while attempting to interact face-to-face with customers in the main office.

When customers do not receive correct information regarding a potential transaction, they may not learn about the correct information until they have waited to be served at a field office. The customer would then possibly have to return home to obtain correct documents and return to the field office for a second time. In addition, without the ability to contact by telephone specific field offices, a customer cannot ask the examiner that may be waiting on them questions about what types of documentation will be needed for their specific transaction in advance of their visit, ask for operating hours, verify that they are open, and even more concerning they could arrive at an office with the expectation that it would be open only to learn that it was temporarily closed due to a lack of staff or another reason.

Office Closures

Due to staffing shortages, the Driver Service Bureau closes as many as five field offices in a day, which prevents customers from receiving timely services.

In addition to the permanent closing of the Jackson Metrocenter field office, the Driver Service Bureau temporarily closes as many as five offices per day statewide due to staffing shortages. In accordance with the Bureau's workload and safety requirements, an office may not open or remain open when only one examiner is available to work in the office. For example, if one of two examiners assigned to a Bureau field office is sick or is giving a road test, the office must be closed temporarily or for the entire day until both examiners are available. Because many of the Bureau's field offices are not fully staffed and some only have two examiners, office closures are fairly typical throughout the state on a regular basis. Comments on social media show that customers have driven to as many as three field offices in one day attempting to locate an open office.

Can Other States' Driver Customer Service Delivery Models Provide Solutions for Mississippi's Wait Time Issues?

In order to understand how Mississippi's contiguous states provide driver services and minimize customer wait times, PEER assessed each state's driver service delivery model. For face-to-face and online service delivery, PEER sought to understand the following for each state:

- entity / entities responsible for driver services;
- type, number, and location of driver service offices; and,
- services provided on-site at the offices and online.

Face-to-Face Office Service Delivery

Alabama Driver Services

Alabama offers driver services through a network of locations throughout the state, including services offered through county probate court offices. The Alabama Law Enforcement Agency (ALEA), Department of Public Safety, Driver License Division has 73 driver service offices in 66 of Alabama's 67 counties. The offices offer a full range of driver services, including regular and CDL knowledge testing.

Skills testing in Alabama is administered separately under ALEA's 12 civilian managed examining trooper district offices, which are responsible for administering regular and CDL skills testing only.

The Alabama Department of Revenue provides license renewal and duplication services in every county at local county probate offices and, on a more limited basis, at local License Commissioner Offices. Both offices are responsible for issuing state and county business privilege licenses. Counties receive \$1.50 of the license fee for each license issued.

Through a network of county and state service offices administered by the Department of Public Safety and the Department of Revenue, drivers have access to local services in all of Alabama's counties.

Arkansas Driver Services

Arkansas divides driver services responsibilities between the Arkansas State Police (ASP) and the Arkansas Department of Finance and Administration (DFA).

The ASP is responsible for all aspects of driver examination, including knowledge and skills testing, and operates driver license testing offices in all of Arkansas's 75 counties. In addition to ASP troop headquarters, the ASP offers testing services during specified hours at a wide variety of

locations—i.e., county courthouses; sheriff's offices; libraries; municipal buildings; city halls; courts; police departments; fire departments; community, recreational, and civic centers; community colleges; workforce training centers; housing authorities; veteran's buildings; and a non-profit electric cooperative. The ASP administers CDL written tests at troop testing sites and all CDL skills tests must be scheduled in advance through the ASP CDL Help Desk at six locations statewide.

The DFA Office of Driver Services administers civilian managed driver services in 135 Revenue Offices located in Arkansas's 75 counties, with a majority of the counties having more than one office. Twenty-five of the offices are designated as REAL ID Offices.

Louisiana Driver Services

The Louisiana Department of Public Safety and Corrections, Public Safety Services, Office of Motor Vehicles (OMV), has 79 civilian managed driver service field offices, with at least one office being located in each of the state's 64 parishes. The OMV administers driver, dealer, and vehicle services, including vehicle and tag registrations.

Seventy-three of the 79 driver service field offices issue and renew regular and commercial licenses (CDL). Seventy-four of the 79 driver offices have regular operating hours, with the remaining four offices being open only part-time.

Driver examination knowledge tests are not administered at field offices and may only be taken at private driving schools. Road skills tests are administered at field offices by appointment only or may be taken at third party testers. OMV's Training and Certification Unit licenses hundreds of commercial driving schools and third-party road skills testers and examiners to certify new drivers after attending a state required 14-hour pre-licensing course and/or a 38-hour driver education course.

The OMV and the Louisiana State Police (LSP) are separate divisions under Public Safety Services and the LSP has no role in managing OMV field offices, licensing drivers, or driver examination.

Tennessee Driver Services

The Tennessee Department of Safety and Homeland Security (TDSHS) provides services through its Driver Services Center offices. In addition, the Department partners with county clerks to provide local license renewal services. TDSHS's combined network of Driver Services Center offices and county clerk partners provides local access to driver services in 70 of 95 Tennessee counties.

The TDSHS Driver Services Division operates 43 Driver Services Center offices offering full services, including driver examination knowledge and skills testing, in 38 of Tennessee's 95 counties. CDL skills tests are only offered at seven Driver Services Center locations and must be scheduled in advance by telephone.

The Driver Services Division has civilian leadership, including an Assistant Commissioner, Director of Driver Licenses, and three regional managers. The Tennessee Highway Patrol does not have a role in examining or licensing drivers because it is a separate division under TDSHS responsible for handling gun permits; crash reports; commercial vehicle enforcement, endorsements, and permits; forfeitures and seizures; safety education and driver education courses (traffic schools); protective services; and special programs, investigations and operations.

TDSHS has also partnered with 47 “County Clerk Partners,” responsible for registering vehicles, which allows drivers to renew or duplicate their licenses in 43 of 95 Tennessee counties.

TDSHS also has 37 self-service services kiosks to renew or duplicate licenses in 19 of Tennessee’s counties.

TDSHS’s website offers an informative and exhaustive list of all service locations by city, county, other partners, county clerk partners and type of service (full, non-commercial duplicates and renewals, CDL skills tests, self-service kiosks etc.), which enables customers to easily search for the nearest service office.

Online Service Delivery

Alabama Driver Services

In Alabama, drivers are able to renew and request duplicate drivers’ licenses and ID cards online and request driving history records. Customers may also schedule an appointment with the Driver’s License Division to schedule a road test.

CDL customers in Alabama may renew and request a duplicate CDL license, schedule a CDL skills test, and submit a required medical certification using an online portal.

Arkansas Driver Services

Arkansas allows customers to request license and ID card renewals and duplicates online. Customers may also pay reinstatement fees, change their address, pre-register for a new driver’s license or ID card, and request driving history records.

Arkansas allows CDL customers to submit medical certifications online. CDL skills testing must be scheduled by telephone.

Louisiana Driver Services

Relative to Mississippi’s contiguous states, Louisiana offers the least in the way of online services, but allows customers to renew their drivers’ licenses and ID cards and request driver history records online. CDL customers may submit medical certification forms online.

Tennessee Driver Services

Tennessee allows customers to obtain a broad range of driver services online. Tennessee customers may renew and request duplicate licenses and ID cards, pay reinstatement fees, reinstate licenses, change addresses, schedule road tests, and request driving history records online. Youth drivers can advance a graduated license (GDL) online and avoid visiting a service office when restrictions are removed from their license as they age.

CDL customers in Tennessee may submit their medical certification forms online. CDL customers must schedule a road test by telephone.

What Actions Have Been or Could be Taken to Address Customer Wait Time Issues?

To lessen customer's wait times, the Department of Public Safety has attempted to fill vacant examiner positions, improve the functionality of its kiosks, and experiment with other innovations, such as appointment scheduling and weekend testing.

During PEER's fieldwork, the Department of Public Safety took positive steps to lessen customer wait times, as described in the following sections.

Department of Public Safety's Actions Taken to Lessen Customer Wait Times

Filling Vacant Examiner Positions

During its 2019 Regular Session, the Legislature included in the Department of Public Safety's FY 2020 appropriation bill \$3.3 million (above the department's FY 2019 appropriation) to provide support for the "duties and operations of the Commercial Driver's License (CDL) and other Driver Services operations." The department plans to use a portion of those funds to fill vacant positions within the Driver Service Bureau. On June 30, 2019, the bureau only had 129 of its 175 examiner positions filled, with 46 being vacant. By October 1, 2019, the department had either filled or begun recruitment efforts for the 46 positions. Appendix C, page 43, provides a listing of positions currently assigned and planned assignments to the Bureau's field offices.

Customer Appointments for License Renewals

The Driver Service Bureau has implemented "Wait Anywhere" same-day scheduling of license renewal services at the following field offices:

- Jackson Headquarters;
- Pearl Troop C;
- Hattiesburg;
- Nesbit;
- Gautier; and,
- Tupelo.

Customers may select an appointment time during the day to schedule a renewal of a license or ID card.

Functionality of Kiosks

On September 19, 2019, the Department of Information Technology Services approved Change Order #9 to the Bureau's Drivers' License

Modernization Contract. In addition to providing for new kiosks, the change order should improve the functionality of the kiosks by:

- *Providing improved address validation*—Changes will improve and enhance the kiosk address verification software, which will reduce the number of failed transactions due to customer address entry errors. The updated address validation and verification logic will support properly formed address entry by the kiosk customer.
- *Screening of ineligible transactions*—Some transactions cannot be completed by using a kiosk—e.g., persons with a suspended, cancelled, or inactive license or a license that has been expired for more than 18 months cannot renew their license through a kiosk. Improvements to the kiosk will inform the customer as to whether a kiosk may be used or whether an examiner must provide the service.
- *Producing an actual license*—Historically, customers using a kiosk received a paper printout that served as a driver’s license until such time that the Jackson headquarters could produce and mail a license to the customer. Planned kiosk improvements are intended to enable the production of a license after the completion of a transaction. This will be limited to kiosk locations with a printer, but could increase their usefulness contribution in relieving workload.

Weekend Driver Testing

The Driver Service Bureau has recently begun a “Jump Start” program directed at young drivers 15 years and older. Youth drivers may schedule a knowledge and skills driving test on two specific Saturdays each month through December 2019.

PEER’s Recommendations to the Department of Public Safety

In addition to steps already taken, PEER recommends that the Department of Public Safety should implement alternatives to its current testing protocol, improve its management of resources by analyzing data provided by its computer system, use other government offices as service providers, and improve information on the Driver Service Bureau’s website.

While the Department of Public Safety (DPS) has taken positive steps to lessen customer wait times, DPS should consider other improvements described in the following sections. These above-noted steps should reap benefits in the near future.

Testing Alternatives

DPS should consider implementing a home or school-based online testing protocol for youth drivers who are seeking their driving permits. Assuming that this type of testing protocol could be developed with sufficient security safeguards, DPS could remove

youth examinees from the Driver Service Bureau's local workload, and provide an efficient secure option for young drivers to obtain permit testing.

In addition, DPS should consider certifying and accepting results from school-based driver education instructors as proof that a student seeking a permit has successfully mastered essential driving skills. This step could also remove youth drivers from the customer base seeking services at Driver Services Bureau field offices.

Graduated Drivers' Licenses

DPS should implement procedures allowing young eligible drivers to obtain graduated licenses through the online portal when restrictions are removed as they age. This service reduces the number of times a young driver must visit a service office to obtain their next driver's license.

Resource Management

The Driver Service Bureau should utilize the capabilities of its new computer system to produce management information that can enhance the efficient operations of field offices. The new computer system can generate a wealth of information about the number of customers served and not served during a day, the types of transactions completed, and total number of transactions completed at a driver service office. Utilizing this type of information, coupled with reliable staffing reports on positions assigned to each office, can assist the Bureau in making decisions about the management and assignment of resources to each office.

- *Types of services requested*—According to information DPS prepared during the planning for the new computer system acquisition, approximately 40% of all transactions processed are less complicated transactions, such as license and ID renewals that require less time to process than more complex matters, such as those involving CDL's. Careful study of field office workload could assist the Bureau in determining if it would be appropriate to implement fast service queues to serve such customers.
- *Examiner workload analysis*—The new computer system could assist the Bureau in developing workload metrics to assist Bureau managers in allocating staff to appropriate field offices based on workload. A simple type of workload analysis is transactions per examiner. For example, Exhibit 6, page 31, shows the number of transactions processed by each examiner in ten Bureau offices during August 2019. Such information could be used by Bureau managers to determine which field offices require additional staffing based on workload.

mExhibit 6: Transactions Per Examiner

Office	Transactions Per Examiner
Meridian	963
Newton	852
Picayune	847
Gulfport	843
Corinth	787
Hattiesburg West	666
Vicksburg	659
Olive Branch	631
Biloxi	610
Laurel	571

SOURCE: PEER analysis of DPS transaction data, August 2019.

PEER notes that two of these offices, Laurel and Vicksburg, are not slated to receive new examiners. Use of these metrics can help DPS manage the assignment of staff to offices and ultimately better serve the public.

- *Office closures and staffing*—As shown in Appendix C, page 43, once the Bureau fills all planned examiner positions, two offices, Clarksdale and Philadelphia, will continue to have only two examiners. Bureau managers should carefully study the workloads of those offices and the number of days that the offices are closed due to staffing issues and determine if the offices should be closed permanently and staff moved to busier offices.
- *Additional Jackson-metro area field office*—For many years, the Bureau has provided services to the Jackson-metro area through two field offices, one located at the DPS headquarters and one located in the former Metrocenter Mall. The Bureau closed the Metrocenter location when the building owner decided to repurpose the building. During 2017 and 2018, the Metrocenter field office processed 24,000 and 27,000 customers, respectively, making the office one of the busiest in the state. Customers who previously used the Metrocenter office were suddenly dispersed to other Bureau offices. Due to the volume of work previously handled by this office, DPS should seriously considering opening another field office in the Jackson-metro area.
- *Allocation of Master Sergeants managing field office examiners*—The Driver Services Bureau utilizes Master Sergeants, who are sworn officers, to manage and oversee examiners in the various field offices. These individuals each manage between 5.5 to 15 examiners, depending on

the district in which they provide supervision. Due to the number of field offices and examiners within the districts, there is a disparity among Master Sergeants regarding their supervisory workload. In addition, based on a one-way trip from district headquarters to each office within the district, some Master Sergeants only have to travel a radius of 60 miles to supervise their examiners, while others are required to travel a radius of approximately 290 miles to supervise examiners.

DPS should analyze the workloads of the Master Sergeants to determine how supervision of the field offices could be reconfigured to provide supervision in a more equitable manner.

Use of Other Government Offices

As has been done in Mississippi's contiguous states, the Department of Public Safety should analyze the use of local county offices such as tax collectors, which process motor vehicle tag registrations, and county clerks to provide renewal and duplication of driver's licenses and ID cards. Such an arrangement would provide services to the public in their local communities.

Improve Website Information

As noted in this report, the Driver Service Bureau website often contains incorrect information. Additionally, it lacks information necessary to provide assistance to customers of the department. In the future, DPS should:

- Place the telephone numbers of all driver service offices on the website so that potential customers can call to determine if the office is open or closed or ask other questions in advance of their visit. If an office is closed, use of a pre-recorded message telling the caller that the office is closed could be sufficient.
- Ensure the accuracy of information on the website. PEER found evidence that incorrect forms were maintained on the website, which have the potential to confuse customers and could even make them spend additional time at the driver service office filling out the correct forms. Line by line instructions on how to complete an application could assist customers who may have difficulty and reduce errors. The ability to complete and print an application online prior to visiting a service office could save time and improve legibility during examiner processing.
- Provide service office location information that is searchable by city and county to enable drivers to locate the nearest service office. Provide a list of all kiosk locations for drivers to locate convenient self-service options.

- Promote alternatives to using examiner desk services such as online services offered on the DPS portal and Bureau websites and self-service kiosks. Website-based explanations of the alternate services could be beneficial to potential customers and could conceivably lessen dependence on examiners for renewal services. As noted in the report, DPS makes many services available on its portal and the Bureau website but the Department should consider offering additional services offered in contiguous states including the ability to change an address, which was offered online until recently. As noted in the report, DPS is taking steps to improve the functionality of its kiosks.

Expansion of Appointments

DPS should consider expanding customers' ability to schedule appointments to include transactions other than renewals. Such an expansion might allow persons to schedule road test appointments to obtain new drivers' licenses.

Appendix A: Transactions Processed by the Driver Service Bureau

The following lists comprise transactions processed by the Driver Service Bureau. The first list includes all transactions processed. The second list includes only those processed by examiners assigned to the local driver service field offices.

All Transactions Processed by the Driver Service Bureau:

1. *Issue 14-year-old Driver Ed learner's permit.*
2. *Test driver's knowledge (Knowledge Test Kiosk).*
3. *Conduct driving test.*
4. *Light-commercial class D knowledge test.*
5. *Issue driver's license.*
6. *Issue light-commercial class D license.*
7. *Renew driver's license.*
8. *Issue Class R under-17 driver's license.*
9. *Issue motorcycle endorsement.*
10. *Issue duplicate license.*
11. *Issue ID card.*
12. *Issue duplicate ID card.*
13. *Issue disability card.*
14. *Issue duplicate disability card.*
15. *Issue MDPS employee ID card.*
16. *Print motor vehicle report.*
17. *Pay reinstatement fees.*
18. *Check driving record.*
19. *Renew ID card.*
20. *Issue CDL learner's permit.*
21. *Conduct commercial road test.*
22. *Commercial knowledge test (Kiosk)*
23. *Issue commercial license.*
24. *Issue hazmat endorsement.*
25. *Issue tanker endorsements.*
26. *Issue doubles/triples endorsement.*
27. *Issue passengers endorsement.*
28. *Issue school bus endorsement.*
29. *Perform original inquiry.*
30. *Verify individual for state pointer.*
31. *Perform individual inquiry (state to NDR).*
32. *Request driver history (state to state).*
33. *Request driver's license abstract (state to state).*
34. *Request driver status.*
35. *Respond to driver history request (state to state).*
36. *Report out-of-state conviction.*
37. *Negate out-of-state conviction.*
38. *Report out-of-state withdrawal.*
39. *Negate out-of-state withdrawal.*
40. *Process court order.*
41. *Suspend/revoke driver's licenses.*
42. *Reinstate driver's licenses.*
43. *Process departmental action.*
44. *Conduct administrative hearing.*
45. *Process DUI conviction.*
46. *Process Failure to Appear (FTA).*
47. *Process Failure to Pay (FTP).*
48. *Process DUI.*
49. *Process citation intake.*
50. *Post citation to driver record.*
51. *Process DUI arrest.*
52. *Process out-of-state citations and violations.*
53. *Register/reregister sex offender (original full registration occurs at local Sheriff's Office).*
54. *Issue sex offender card.*
55. *Perform accident report intake.*
56. *Produce accident report copy.*
57. *Produce accident reconstruction report.*
58. *Process proof of insurance.*
59. *Process insurance affidavit.*
60. *Perform FR accident processing.*
61. *Issue firearms permit.*
62. *Renew firearms permit.*
63. *Conduct firearms background check.*
64. *Issue retired law enforcement firearms permit.*
65. *Issue security guard permit.*
66. *Renew security guard permit.*
67. *Conduct security guard background check.*
68. *Issue retired law enforcement security guard permit.*
69. *Process Social Security Administration verification.*
70. *Process a surrendered license.*

Driver Service Bureau Examiner Transactions Processed at the Office Counter:

1. *Duplicate Learner's Permit*
2. *Learner's Permit*
3. *Intermediate License*
4. *Original Non-US Citizen Driver License*
5. *Regular Class R Driver License*
6. *Light-Commercial Class D Driver License*
7. *Driver License Renewal*
8. *Driver License Non-US Citizen Renewal*
9. *Motorcycle Permit*
10. *Motorcycle Endorsement*
11. *Duplicate Driver License*
12. *Original ID Card (Regular and Disability)*
13. *Duplicate Intermediate License*
14. *Duplicate ID Card (Regular and Disability)*
15. *Duplicate ID Card Non-US Citizen*
16. *Driver Record MVR*
17. *ID Card Renewal (Regular and Disability)*
18. *Duplicate ID Non-US Citizen*
19. *Duplicate Driver License Non-US Citizen*
20. *CDL Permit*
21. *Duplicate CDL Permit*
22. *CDL Medical Card Update*
23. *Duplicate CDL License*
24. *Original CDL (Class A, B, C)*
25. *Hazardous Material Endorsement (H)*
26. *Tank Endorsement (N)*
27. *Doubles/Triples Endorsement (T)*
28. *Passenger Endorsement*
29. *School Bus Endorsement*
30. *Out State License Surrender*
31. *Copy of Tickets/other documents*
32. *Ignition-Interlock-Restricted License*
33. *Reinstatement Fees (Regular, DUI, Child Support)*
34. *Compliant Sex Offender*
35. *Crash Photo Copy*
36. *Firearm Permit Duplicate*
37. *Original Firearm Permit*
38. *Firearm Renewal*
39. *Duplicate Security Guard Permit*
40. *Original Security Guard Permit*
41. *Security Guard Renewal*
42. *CDL Book sale*
43. *Regular DL Book sale*
44. *Motorcycle Book sale*
45. *Copy Blood Alcohol Content (BAC) Report*

SOURCE: Driver Service Bureau information provided to PEER as of Fall 2019.

Appendix B: Driver's License Modernization Project

In 2012, the Department of Public Safety (DPS) began a comprehensive upgrade of the information technology systems used to support the Driver Service Bureau. This project, generally known as the Drivers' License Modernization Project, traces its origins to a detailed study of the needs of DPS relative to the efficient and effective delivery of services for the people of Mississippi.

Genesis of the Driver's License Modernization Project

Prior to entering into a contract for the new system, DPS developed a roadmap for the phased implementation of a new or replacement Drivers' License (DL) System. The roadmap was based, in part, on the evaluation of the Bureau's existing DL system with the intent of developing a procurement strategy for a new or replacement DL system, including time and cost requirements.

Contracting with a Consulting Firm

To study the internal and external environment in which driver service activities are carried out, DPS contracted a Seattle-based consulting firm, MTG Management Consultants. MTG developed several important findings and conclusions regarding both the current business environment and the technical environments in which driver services are delivered. In summary, the most significant conclusions included:

- DPS customers generally perceived that it took too long to receive services from the Driver Service Bureau offices.
- The Driver Service Bureau lacked systems and metrics to measure wait times and work flow for driver service functions, causing supervising sergeants to manage their staffs by observation rather than by management information systems output. The consultants believed that as many as 40% of all Bureau transactions were "simple" and required limited work by DPS staff.
- There was limited training for driver services staff causing them to do most of their learning by doing.
- There was high turnover among the staff of driver services.

Additionally, the consultants had several findings related to technical aspects of DPS's computer systems. The most significant of these included:

- The Driver Service Bureau's current mainframe-based system software was expensive to maintain, obsolete, and could not be upgraded.
- Staff familiar with the system and capable of supporting it were approaching retirement age. Further, issues with a lack of documentation required new technical staff to be reliant on the tenured staff.

- Some of the DL system data originated from partner computer systems, but it was not conveyed in an automated or integrated fashion. These systems provided information on driver records, revocations, and reinstatements.
- Important documents were managed in several places.
- The system was not compliant with Standards Based Information Exchange (XML).¹⁰

Consultants' Goals for a Driver Service System

To guide DPS in its decisions about necessary changes to its driver service computer system, the consultant identified several goals for any system whether it be an upgrade of the current system or a completely new system. Briefly, these goals were:

- improve business operations;
- modernize the system with respect to user interfaces, functionality, and maintainability;
- tightly integrate and connect systems;
- standardize the system and processes to enforce policy and procedures;
- participate in and leverage national programs and services;
- streamline document management;
- continue outsourcing of credentialing;
- automate simple transactions; and,
- focus personnel on high-value and more complex transactions.

The consultants asserted that if DPS achieved these goals, a new or upgraded driver service computer system would:

- ensure that business operations are managed and controlled by:
 - making sure business processes are documented and repeatable; and,
 - fostering the knowledge, skills, and abilities (KSAs) required for managing DL operations.

¹⁰ XML is a standard-based language for marking up text or any other data to facilitate people and computer systems to communicate and understand each other.

- encourage customers to use self-service for simple high-volume transactions (40%) such as:
 - kiosks for self-service;
 - self-service work stations (Internet portal); and,
 - dedicated “quick turnaround” examiner stations at high-volume offices.
- DPS acquires a modern DL information system that is:
 - application driven by business rules;
 - built on modern technology; and,
 - integrating DL application with document management.

Consultants’ Options for a Driver Service System

The consultants provided the Department of Public Safety with three options for improving its driver service computer system, as described below.

1. Upgrading the Legacy System: This upgrade option would provide DPS with an incrementally better computer system than its current system and would have little impact on the current staff as it would be similar to the older system, but would be a less integrated system than other options offered. An upgraded system would also move DPS away from older mainframe systems that the Department of Information Technology Services is encouraging. The upgrade option would provide a relatively low-cost alternative to other costlier options, with the consultants estimating that the total cost of an upgrade would be approximately \$8 million with annual costs similar to those currently experienced with completion occurring in eighteen months.
2. Acquiring a Drivers’ Records Administration System: The consultant noted that several firms could provide robust records administration systems. These systems would satisfy the need to move away from main-frame based systems and would likely be supported by software providers for twelve to sixteen years, and provide improvement over the current system, but would not completely integrate all driver services into one system. The costs of such a system would be \$8 to \$11 million over twenty-four to thirty months and would address only records administration, requiring DPS to contract separately for credentialing and DL issuance.
3. Procuring an Integrated Drivers’ Records and Credentialing System: The third option would consist of procuring an integrated driver records and credentialing system. The integrated driver records administration and DL issuance and credentialing approach provides the opportunity for the greatest improvements in functionality and work flow management, as well as a tightly integrated systems solution. Key to helping ensure the success of an integrated system is DPS’s ability to invest the necessary business and technical resources to undertake a significant redesign of

business processes and practices and appropriately leverage the capabilities of the technology. This system would have to be re-procured approximately every ten years. This option would not require use of mainframes, have a conversion period of twenty-five to thirty months, and cost approximately \$10 million.

DPS considered the third option to best advance its goals of integrating systems and providing efficient and effective services to the people of the state.

Selection of a Contractor

Based on the consultants' work, DPS developed a Request for Proposals (RFP) that described the specific functional and technical requirements for the Bureau's new computer system. The RFP stated that the successful contractor would be required to implement a computer system that provided a system of drivers' license and drivers' records administration, safety responsibility records management, and card issuance processes, including production of cards, queuing, and knowledge testing. The RFP also required that the successful contractor be able to accommodate point of sale management, with workstations being installed in the Bureau's field offices. The RFP noted that the Bureau's current computer system consisted of many components, and some managed by third.

On October 11, 2011, the Department of Information Technology Services (ITS), on behalf of the Department of Public Safety, issued RFP Number 3641 which called for proposals to contract for the implementation of the new drivers' information and credentialing system. The deadline for returning responses was November 26, 2011. Nineteen representatives of interested contractors attended a mandatory bidders conference on October 27, 2011.

ITS received only one response to the RFP from L-1 Identity Solutions AG, now doing business as Morpho Trust USA, Inc. (Morpho Trust). Regarding the lack of competition, ITS staff reported to the ITS board that other firms chose not to participate when they realized that they would have to find other firms to partner with to provide the range of services required by DPS. One potential bidder asserted that it believed that there were only two firms that would be able to carry out the work required under the RFP.

The staffs of ITS and DPS jointly recommended the selection of L-1 Identity Solutions (Morpho Trust) as the lowest and the best vendor responding to RFP No. 3641 to provide hardware, software, and services for the modernization of the current CDL and DL systems at a total nine-year lifecycle cost of \$42,104,665. This cost consists of development costs, per card costs, maintenance costs, and costs to extend the existing driver issuance agreement for one year (July 1, 2014, to June 30, 2015). DITS approved the selection of L-1 on May 11, 2012.

Implementation of the Project

ITS and DPS staff signed a contract with Morpho Trust on October 9, 2012. The contract represented a relatively new approach to managing issuance and drivers records in the United States. At the time of its adoption, there were no systems in use that attempted such an ambitious scope of work as that required in the Morpho Trust contract. DPS staff have noted that projects of this complexity have risks that cannot be fully mitigated or anticipated. During the early years of the project, several unforeseen events occurred that impacted on-time delivery for the new system by 2015, the implementation target date, as described below.

- *Retirement of key DPS staff:* The retirement of programmers/analysts and sworn officer managers impacted the completion of the project. Their knowledge of the needs of the system and the necessary business services that needed to be provided were critical to final completion.
- *Failure to produce timely deliverables:* Both staff of Morpho Trust and ITS acknowledge that all deliverables required in the contract were not completed in a timely manner, primarily because certain data conversions did not occur as expected. In addition, certain equipment items were not procured in a timely manner. ITS's new server environment also contributed to the failure to produce deliverables as contractually required.
- *Amendments and change orders:* Since initiation of the project, the contract requirements have been amended through change orders, some of which were requested by DPS. Some of the change orders were designed to improve the functionality of the new computer system, while others resulted from changing state and federal legal requirements.

Assessment of Implementation Delays

After failing to meet the revised August 2016 "go live" date for the new computer system, DPS again contracted with MTG Consulting to assess the reasons for the implementation delays. In its December 20, 2017 report, the consulting firm concluded that the delays occurred because:

- DPS lacked a traceability matrix to assist DPS in identifying what project work tasks had been completed and those tasks that still needed to be completed;
- the time needed to effect change orders was slow, with some change orders in a pended state waiting to be reviewed and processed and some procurements associated with change orders not being handled in a timely manner;
- change orders did not have accurate cost estimates;
- DPS did not have a dedicated, full-time employee to serve as the project manager for the implementation of the project;
- Morpho Trust did not utilize a business analyst to oversee the contract from the contractor's standpoint; and,
- DPS and Morpho Trust did not have an effective quality assurance process for the contract.

Despite the consulting firm's observations, DPS did not designate a project manager or quality assurance officer for the contract, primarily because the contract was 'well advanced.' DPS did develop and adopt a traceability matrix to identify work tasks that needed to be accomplished by DPS and Morpho Trust staff.

By the fall of 2018, the new computer system became fully operational in all Driver Service Bureau offices of the state.

Project Costs

The original cost estimate for the new computer system project was \$42,604,665. By September 2019, the cost estimate had increased to \$59,165,785, \$16,561,120 more than the original

estimate, due primarily to the cost impact of change orders required during the implementation of the system.

According to ITS staff, delays and cost increases often occur in computer projects of the size and complexity undertaken by DPS. ITS staff considered the cost estimate increases to be within a normal range for this type of project.

DPS Staff's Assessment of the Project's Implementation

PEER requested DPS staff to provide the department's perspective regarding the implementation of the Driver's License Modernization Project. The following is the department's assessment.

It is important to understand the factors driving the Modernization project:

- *Post 9/11/2001 requirements for credentials and systems;*
- *Compliance with federal and state laws, rules and regulations;*
- *Lack of personnel to support the 40-year-old mainframe;*
- *Legacy technology platform well past its planned service life;*
- *Modern systems and interfaces unable to interact with the mainframe;*
- *High costs for contract support of mainframe, if even available;*
- *Old Mississippi credentials easily counterfeited (new system incorporates highest level of security); and,*
- *Time limited availability of some federal support funds for initiative.*

While the increased wait times are an unfortunate and hopefully temporary side effect of the new system, it is important to realize that the system was not installed to decrease wait times, but for the reasons above. Reasons for increased wait times include:

- *Lack of filled examiner positions;*
- *Learning curve for the new system;*
- *New system REQUIRES issuance rules be followed, no shortcuts; and,*
- *Slow interface response from required external validation checks along with interpretation by the examiner of information returned in some validations.*

It is also important to realize the context of the project inception in 2011. Every state system is different and custom-made for that state's laws and policies; therefore, there was no "off-the-shelf" system which could be purchased by Mississippi to replace the mainframe system. Although the federal mandates for improved credentialing systems had been issued, only one company submitted a bid for this project in response to the formal RFP. Mississippi was ahead of the curve in beginning this project and continues to have a system in full compliance, unlike many larger states with tens of millions of dollars in budget for modernization projects. For example, California has yet to issue a single compliant Gold Star license, while Mississippi has been issuing them for over a year.

Other states have attempted a hybrid system of some cards being non-compliant, and others (usually at higher cost) being compliant. Mississippi continues to meet requirements by issuing all credentials as compliant within the same cost structure.

It is also important to note that the federal legislation in response to 9/11 mandated state compliance with systems that did not exist at the time of passage. The design

process for the State-to-State (S2S) verification service, for example, mandated to prevent people from holding multiple credentials from various states as did the 9/11 terrorists, was not completed until years into the Modernization project. These system designs could not be designed into the Modernization system until those systems themselves were created, and this was also factor in extending the project deadline. The S2S verification service design was begun in 2009, with the national central site development starting in October 2012 and operational status for the first state of January 2016.

Rather than focusing on the side effect of station wait times, it is important to note that the Mississippi D360 Modernization system goal to create and install a system that meets or exceeds all federal and state requirements for security and identity verification and has been achieved and continues today. This is a cause for pride rather than condemnation.

SOURCE: Department of Public Safety and MTG Management Consultants, LLC, reports May 2010 and December 2017 obtained by DPS.

Appendix C: Driver Service Bureau's Current Examiner Staffing Level and Planned Increases

Office	Current Examiner Total	Planned Examiner Increase
Batesville	4	1
Biloxi	4	2
Brookhaven	4	2
Clarksdale	2	0
Cleveland	3	1
Columbus	5	2
Corinth	2	2
Gautier	5	1
Greenwood	5	1
Grenada	2	1
Gulfport	4	2
Hattiesburg	8	0
Hattiesburg West	3	2
Headquarters	8	2
Indianola	2	1
Kiln	2	1
Kosciusko	2	1
Laurel	4	0
Meridian	2	4
Natchez	2	1
Nesbit	7	1
New Albany	5	0
Newton	1	4
Olive Branch	4	4
Oxford	4	1
Pearl	7	0
Philadelphia	2	0
Picayune	2	2
Richland	4	0
Starkville	4	1
Summit	3	3
Travel Team	2	0
Tupelo	5	2
Vicksburg	3	1
Walnut Grove	3	0
TOTAL	129**	46

*Orange shading denotes offices at risk of closure due to low staff levels. Green shading denotes at-risk offices not receiving staff increases.

**Staffing data includes eight new hires.

SOURCE: PEER Analysis of data provided by DPS DSB for October 2019.

Agency Response



STATE OF MISSISSIPPI
PHIL BRYANT, GOVERNOR
DEPARTMENT OF PUBLIC SAFETY
MARSHALL L. FISHER, COMMISSIONER

Agency Response

December 9, 2019

James A. Barber, Executive Director
Joint Legislative Committee on Performance and Expenditure Review (PEER)
P.O. Box 1204
Jackson, Mississippi 39215
HAND DELIVERED

RE: Review of the Driver Service Bureau's Management of Customer Service Delivery Draft Report

Dear Mr. Barber:

Thank you for allowing us the opportunity to review the draft of PEER Report #637, ***Review of the Department of Public Safety Driver Service Bureau's Management of Customer Service Delivery***. The agency appreciates the time and effort taken by your staff to provide the report findings in a clear and concise manner. The Driver Service Bureau has already begun making improvements in areas related to web services and in districts with personnel shortages and will continue to work on implementing the other recommendations in this report that will lead to a more efficient and effective delivery of the agency's customer services.

This fiscal year, the Legislature approved an additional appropriation to the Driver Service Bureau and the agency is using these funds to fill vacancies and purchase additional kiosks to help improve customer wait times across the state. We are very appreciative of their continued support as we work on identifying additional measures to improve wait times.

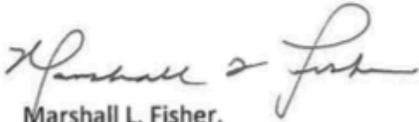
As noted in the report, 60% of the transactions processed are more complex than the standard driver license and identification card renewals and duplicates. These complex transactions, such as Firearm Permits and Sex Offender Registries, are taking longer to complete due to the added security of the system. In addition to improving customer service, the need for expanding our station locations to include more workstations is vital. This however has become more complicated due to the addition of Firearm Permits and Sex Offender Services.

Firearm Permits require a DPS Driver License Examiner to spend additional time beyond the average transaction time of 9 minutes and 25 seconds scanning the required background documentation. This transaction process is required by statute and has proven to contribute to the overcrowding of the satellite stations while hindering transactions that warrant more extreme need such as renewals of credentials, etc.

Additional mandates required by statute for services provided by driver license examiners to registered sex offenders create increases in customer wait times as well. Sex offenders randomly enter driver license stations across the state each day because they are required to re-register every 90 days. Other events such as an address change, or job change require them to go to a driver license station within 10 days to update their information each time a change is made. Additionally, when searching for future driver license station locations, the services we provide for sex offenders creates an undue burden on local officials to find a suitable facility outside of the proximity of local schools, parks, playgrounds, and day care facilities. It is becoming more problematic opening new driver license stations due to concerns of registering sex offenders at potential locations.

In closing, we agree there are items outlined in the report that are worthy of change. We will continue to work together with the Legislature and ask for their continued support on improvements of customer service delivery. We cannot express our gratitude enough to the staff of the PEER Committee for their patience, professionalism and ability to be thorough. We appreciate your willingness to work with us to better serve the citizens of this great state and implement meaningful change.

Respectfully,



Marshall L. Fisher,
Commissioner of Public Safety

cc: Colonel Chris Gillard
Lieutenant Colonel Ken Brown

PEER Committee Staff

James A. Barber, Executive Director

Legal and Reapportionment

Ted Booth, General Counsel

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