



Driver & Vehicle Services

Report of the Independent Expert Review

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Letter from the Chair

Senator Scott Newman

Chair, Senate Transportation Finance and Policy Committee

Senator Scott Dibble

Ranking Minority Member, Senate Transportation Finance and Policy Committee

Representative Frank Hornstein

Chair, House Transportation Finance and Policy Committee

Representative John Petersburg

Ranking Minority Member, House Transportation Finance and Policy Committee

Cc: John Harrington, Commissioner of Public Safety; **Cassandra O’Hern**, Deputy Commissioner of Public Safety; **Tim Lynaugh**, Assistant Commissioner of Public Safety; **Pong Xiong**, Director, Driver and Vehicle Services

The Independent Expert Review (IER) team is pleased to submit its report as requested by the Legislature. We covered two specific requests (Deputy Registrar filing fees and the optimal number of exam stations) and more broadly reviewed the state of driver and vehicle services in Minnesota. Though the two requests had different deadlines, we have pulled forward the Exam Station recommendation, due in November 2022, to include with the filing fee recommendations, due in February 2022, to give the Legislature and the Administration more time to consider both. We completed numerous visits and interviews, conducted a 50-state survey, and reviewed Office of Legislative Auditor (OLA) reports and a variety of data to identify suggestions for improving the entire driver and motor vehicle ecosystem.

As you read through this report, you will note we suggest a focus on service to Minnesotans. Though there are many stakeholders in the driver and motor vehicle ecosystem, including end-users of the software, like Deputy Registrars and auto dealers as well as Driver and Vehicle Service (DVS) as the owner of the process, Minnesotans are the primary customer. We focused on how best to improve service to Minnesotans in the short and medium term. Increasing self-service options is essential. As this evolves, Deputy Registrar services are critical. Thus, both of these pieces must be supported.

We hope you will find the recommendations useful and practical. We believe that implementing them will move the whole ecosystem forward and provide more timely and better service to the customer.

The IER is grateful for all the support it received in preparing this report. Thanks go to the staff at DVS and the Department of Public Safety (DPS), the Deputy Registrars and their two associations, the OLA, Minnesota Auto Dealers Association (MADA), Minnesota Inter-County

Association (MICA), and FAST Enterprises, with special callouts to Assistant Commissioner Tim Lynaugh and Directors Pong Xiong and Tony Anderson.

The IER team of Theresa Wise, Amy Albus, Jenni Hein and I look forward to having discussions with you and answering questions. Should any of you or your members have questions about recommendations in this report, please let us know. We look forward to seeing these recommendations adopted.

Respectfully submitted,

A handwritten signature in blue ink that reads "Rick King". The signature is stylized, with a large, looped "R" and a long, horizontal tail.

Rick King

Chair, Independent Expert Review
and Technology Advisory Council

Independent Expert Review

The Independent Expert Review (IER) team was designated to review the current state of driver and vehicle services provided to Minnesotans and to submit a report to the Chairs of the Transportation Committees in the Senate and the House with recommendations for optimizing services and associated funding, as well as staffing and fees¹. A request to review the state of exam stations and suggest an appropriate number of locations followed.

The IER is led by Rick King, the Chair of the Technology Advisory Council, which provides advice on ensuring that the State of Minnesota's IT systems provide the best service and the most efficient use of taxpayer dollars. He is assisted by three other subject matter experts, with experience in Process Improvement, Knowledge Management, Change Management, Systems Thinking, Data Analysis, Technology Implementation, and Organizational Transformation: Amy Albus, Jenni Hein and Theresa Wise. The IER is a volunteer team, and its members are not part of the state government.

The IER sought to understand the current operational processes and workflows, financial and performance measures and staffing structure that contribute to the current state. We completed a 50 state survey relative to Deputy Registrar functions and fee structures. We conducted over 20 site visits and interviews from across the state, including metro, suburban, and greater MN and including from private and public entities. The IER gathered and considered data and comments from the following parties:

- ❖ Department of Public Safety (DPS) and Driver and Vehicle Services (DVS)
- ❖ Deputy Registrars² (including Driver's License Agents), individually and through the Minnesota Deputy Registrar Association (MDRA) and the Deputy Registrar Business Owners Association (DRBOA)
- ❖ Exam stations
- ❖ FAST Enterprises
- ❖ The Minnesota Auto Dealers Association (MADA)
- ❖ The Office of the Legislative Auditor (OLA)

¹ See: Laws 2021, 1st special session, chapter 5, article 4, sections 144 and 145. Section 144 sets up the review and section 145 establishes the legislative intent for the review. The appropriation is found in Laws 2021, 1st special session, chapter 5, article 1, section 4, subdivision 4, paragraph (b).

² Throughout this report we use 'Deputy Registrar' as an all encompassing term to include functions performed by both Deputy Registrars (vehicle registration and titling) and for Driver's License Agents (DLAs) who provide driving credentials.

Executive Summary & Recommendations

The ecosystem that registers and titles vehicles and also tests and licenses drivers in the State of Minnesota is complex, with many different constituents, each playing an important role. It includes the Department of Public Safety's (DPS) Driver and Vehicle Services Division (DVS), Deputy Registrars, both public and private, Minnesota Auto Dealers Association (MADA), FAST Enterprises and more. These organizations are highly dependent on each other and depend on a good system to facilitate transactions. With MNDRIVE, the state has a solid technology system at its core, completing transactions with reliability and accuracy.

Our recommendations for optimization are listed in the Executive Summary below and in later sections of the report with additional detail.

KEY THEMES

Throughout our review we saw a few key themes:

1. **MNDRIVE is working well.** As designed, more work is being completed at the counter when the customer is present, improving the quality of the data and the overall speed of completion - but this is also increasing the amount of time spent on each transaction. The Deputy Registrars report a strong desire to improve the transaction speed and process flow.
2. **People across the ecosystem are feeling exhausted.** Repeated concerns were raised about the welfare of staff. The pandemic and the introduction of REAL ID are the main contributors.
3. **Deputy Registrars are a key component of a functioning ecosystem today** and some are having difficulty maintaining a viable operation without adjusting the services they offer or being financially supplemented by outside resources.
4. **Customers are looking for more and better self-service options.** This includes Minnesotans who want quick, easy access to information and more flexibility to transact from anywhere, including online from the convenience of their home. It also includes Deputy Registrars who want real-time access to clear information, online or from DVS support services so they can provide efficient and effective customer services while the customer is at the counter.

MNDRIVE

Recognizing errors were regularly being discovered in back-end processing, DVS sought to move more work to the front counter and closer to the customer, aiming to improve overall efficiency and accuracy. This required a change to the technology utilized. MNDRIVE was rolled out as the technology solution for Driver Services in October 2018. The first phase of Vehicle Services (including most vehicle transactions) moved to MNDRIVE in November 2020 and the second phase (for Prorate transactions) rolled out in October 2021. The software is reportedly performing as designed, accurately processing transactions without the persistent glitches of prior systems. With MNDRIVE, more of the data entry for each transaction is happening with the customer present, when problems are more easily detected and can be corrected in real time.

We note that MNDRIVE has been used for the majority of both driver and vehicle services for at least a year now. Most end-users have gone through training and the normal learning curve. The software is continuously enhanced and is performing better than at rollout. It always takes time when introducing a new system to reach a steady state. From a software perspective, we have reached that phase. We can now consider shifting more backend headcount previously used for auditing & rollout activities to areas under stress like exam stations and call center staffing (including for knowledge management).

A Challenging Environment

It is clear, given the data we have, that more of the transactional work is being done on the front-end than before, mostly by Deputy Registrars and DVS counter staff, but also by dealers and Minnesotans, in the case of self-service renewal and pre-applications for a driver's license. System effectiveness and greater attention to detail by Deputy Registrars reduces the need for back-end auditing and creates greater opportunity for automated approval of transactions, where warranted. The IER believes these efficiencies should begin to emerge soon. So far, this has not been the case because of numerous, compounded issues, some of which are unrelated to the typical inefficiencies following the rollout of a new system. These issues include the following.

- The backlog of transactions from **MNLARS**, the previous driver and vehicle licensing system, needed to be cleared with many requiring deeper research.
- The launch of **REAL ID** in the state caused another backlog with much confusion about what documents were needed.
- The **pandemic** then hit and many Deputy Registrar and state offices were closed.

All of these factors caused backlogs in licensing, titling and very visibly at exam stations. As a result of all this, the Public Information Center (PIC) call center was jammed with calls, creating long waits for even simple questions.

These factors contributed to stress being acutely felt by staff within the call centers, exam stations, Deputy Registrar and DVS offices, as well as by Minnesotans. The occurrence of staff being screamed at on the phone lines and in person, being threatened with bodily harm and, in some cases, physically attacked rose as society increasingly voiced frustration with service providers in grossly inappropriate ways.

We believe that as all of the above factors abate (e.g., offices and exam stations return to normal service; Minnesotans become more familiar with REAL ID document requirements), more efficiencies will be found in the back-end processing, customer behavior will likely improve, and pressure will ease up on the PIC. In the meantime, more stringent security and protective legal mechanisms may be necessary to address the problem of inappropriate behavior. Training staff on de-escalation and negotiation techniques should also be considered as part of the overall solution.

As we examined the current ecosystem and we recognized some of the problems faced, we also began to imagine what a best in class experience might look like.

CHANGING LANDSCAPE FOR DRIVER & VEHICLE SERVICES

The purpose behind the DVS ecosystem is to ensure the roads are safe, with people tested and licensed to prove their competence to drive, and vehicles registered and licensed to keep roads maintained and safe to drive on.

With a reliable technology system (MNDRIVE) as the foundation, the IER team believes Minnesota is well-positioned to improve the driver and vehicle service experience for Minnesotans. We can increase the speed and quality of service by:

- **Improving and offering expanded online, self-service options;**
- **Removing unnecessary activity** (like extra auditing or too many keystrokes) **and transaction volume** of limited value (like knowledge exams for out of state licensed drivers); and
- **Providing proper central support** for Deputy Registrars. We can be assured that Minnesotans will receive the service they need and deserve - in-person, online, or over the phone.

Historically, Minnesotans have relied on in-person service at a Deputy Registrar office for most transactions. We have already seen some movement to online transactions but

note that Minnesota trails other states in the variety of online services available. With the ability to complete high-value banking transactions online, and the rapidly changing technology available for identification and multi-factor authentication, we believe even more transactions should be considered for self-service in the DVS ecosystem.

Though self-service may reduce reliance on the Deputy Registrar model in the longer term, in the near to mid-term we see a compelling need to ensure the viability of local, Deputy Registrar offices. The current technology does not allow for all transactions to be completed online, and even if it did, there are many customers who still prefer or require face-to-face service.

While MNDRIVE, in total, has not increased the overall amount of work to be completed, it has shifted more work to the Deputy Registrar and DVS front counters. Also, the introduction of REAL ID (and the ongoing offering of the Enhanced Driver's License) has substantially increased the amount of time customers are spending at the counter. At the same time that counter staff are spending more of their time servicing *drivers* than ever before, many of the easier *vehicle* transactions are moving online. Combined, these factors have had a negative impact on Deputy Registrar profitability.

The IER Team believes that select Filing Fees must be increased to compensate for the changes Deputy Registrars are experiencing. By also sharing online fees with Deputy Registrars from the self-service vehicle transactions and by increasing the number of years a driver's license is valid, we ensure financial viability for Deputy Registrars and can also minimize the impact of fee increases on Minnesotans. We want to improve the quality and speed of service, minimize the pain points for all, and still accomplish the purpose behind the ecosystem.

CUSTOMER EXPERIENCE

Throughout our review, we kept our focus on the customer experience, believing that a customer experience done well is a catalyst for improving trust in government. Multiple agencies are on journeys toward improved customer experience and have developed and shared resources³ for leveraging accepted industry methods, including human-centered design. The result is a renewed focus on what customers need from government, with agencies committing to understand and improve customer pain points.

³ **A Guide For Agencies Building CX Capacity** – Digital.gov
Customer Experience Services Evaluation and Buying Guide -
<https://www.gsa.gov/cdnstatic/CX%20Evaluation%20and%20Buying%20Guide.pdf>
The Rise and Fall of the Government Chief Citizen Experience Officer -
<https://www.gartner.com/document/3999518?ref=solrAll&refval=306107269>

Minnesotans are currently receiving sub-par experiences and the various parties in the end-to-end process are experiencing pain in delivering value. Minnesotans are frustrated as they encounter lengthy service backlogs, slow procedural throughput speed, and lack of service availability and/or convenient options that meet their needs. DVS and Deputy Registrar staff are burned out, caught between providing an excellent customer experience (that requires answering questions and coaching to support the customer through the process) versus maintaining a financially viable operation (that requires quickly pushing customers through the process in high volumes).

Evolving requires defining the optimal customer outcome, redesigning processes and systems to support the desired outcome, and measuring progress toward attaining that outcome through established performance expectations.

It also requires effective Change Management. PROSCI, an industry leader in organizational change management, has helpful resources⁴ for organizations to use to more effectively evolve along with large, systemic changes. Change impacts processes, systems, tools, job roles, workflows, mindsets, behavior, and more - and impacts different groups within the same workflow in different ways - which PROSCI illustrates in the image below. As the owner of the driver and vehicle experience, DVS is uniquely positioned to lead the change management necessary for effective transformation.



MNDRIVE has the power to create a different customer experience and a better work environment for experts across the transactions by providing Minnesotans with a multichannel experience where they can select options that best meet unique needs and preferences. A great driver and vehicle customer experience in Minnesota would include the following.

⁴ Why Change Management - prosci.com

- **Clear answers** to questions about the process in a manner that meets individual needs via a trusted counselor across the counter at the local Deputy Registrar office, over the phone with a knowledgeable contact center staff, via chat powered by AI and Machine Learning that gets smarter the more it is used, *and* through a reliable, easy to search online knowledge base that is always available
- **Convenient, flexible service** that enables walk-in service, scheduling appointments for counter service, transacting services over the phone *and* real-time from a browser anywhere
- **Options that match customer preference**, including offering consistent options to pay (credit card and checks always accepted) and offering hard goods (licenses, plates, tabs) *and* an option to select a digital version
- **Optimized delivery timeframe** that supports hard goods in the mail within a couple weeks *and* today by visiting a local service center

LEGISLATIVE AND POLICY CHANGES

Sometimes it is not the people, the organizational structure or the technology that gets in the way of progress, but the laws and policies, as applied. There are a few legislative and policy changes that are foundational to the modernization of the driver and vehicle service experience for Minnesotans. By far, the most commonly raised concern was around data privacy law and policy, but we also discussed law and policy related to telephone transactions, self-service, automated approval of transactions, required documentation for credentials, and issuing electronic titles and credentials.

Further exploration of these topics and adjustments to current law and policy could:

- improve customer service by **reducing the need for in-person transactions**;
- **reduce the time and cost** for transactions; and
- **simplify service delivery** for DVS and Deputy Registrars alike.

Some of our recommendations listed below can be acted on immediately by DVS. Others will require action by the Legislature.

LIST OF RECOMMENDATIONS

Deputy Registrars

1. DVS, in consultation with the Deputy Registrars, should revise the **Deputy Registrar contract** to encourage all Deputy Registrars to become or remain Full-Service Deputy Registrars.
2. Minnesota law should be amended to allow Full-Service Deputy Registrars to offer **expanded services** including, but not limited to fulfilling requests and receiving filing fees for: 1) driving records; 2) crash reports; 3) vehicle records, to the greatest extent allowed by federal law.
3. Minnesota law should be amended to allow Deputy Registrars to provide appropriate and proper **customer service via the telephone**.
4. In 2022, Minnesota law should be amended to **increase the filing fee for driver's license applications**.
5. Minnesota law should be amended to **allocate 25-50% of the filing fees for mail-in and online vehicle transactions** to *Full-Service* Deputy Registrars, incentivizing promotion of online activity.

Exam Stations

6. We recommend that DVS should maintain between **40-50 exam stations**.
7. DVS should explore methods to **reduce exam retakes**, especially after the second "free" retest, including how to support learning and whether to raise the fee for subsequent road and knowledge tests after the second failed attempt.
8. DVS should track and **share student pass rates** for each certified driving school and investigate high student failure rates when they occur for a given school.
9. Minnesota law should be amended to eliminate the requirement that Class D-Regular licensed drivers (21 and over) from other states take the **knowledge test** before receiving a Minnesota license (including with a motorcycle endorsement).
10. Minnesota law should be amended to **extend the validity of a Class D-Regular driver's license** from four years to eight years.

11. DVS should seek authority to **leverage certified and impartial third parties** for administration of knowledge and road tests, where and when needed.
12. DVS and the Legislature should continue to fulfill the **OLA recommendations** in the March 2021 report on exam stations.

Driver & Vehicle Services

13. DVS should implement **data and reporting practices** to inform customer-centric, data-driven decisions.
14. DVS should conduct a **staffing review** that balances staff quantity and quality, leverages technology automations and configurations, and establishes performance standards and targets that meet the needs of Minnesotans.
15. DVS, in consultation with the Deputy Registrars, should identify performance and service standards and create a **Deputy Registrar Performance Scorecard** that monitors user performance to drive a consistently positive experience for Minnesotans.
16. DVS should provide a **rapid response communication method** for situations where Deputy Registrars need support and a Minnesotan is waiting.
17. DVS should engage DNR to review the MNDRIVE system as a potential solution to **replace the DNR system** for boat, ATV and snowmobile registration.
18. DVS should explore ways to speed up **background checks** of new employees at DVS (including exam stations) and Deputy Registrar offices, including possibly using a police department or county sheriff who may be able to obtain faster approval.
19. DVS fulfillment expenses for mail and online transactions should be funded from a **direct appropriation based on the number of transactions** DVS completes and the true cost of fulfillment, rather than from their general operating budget.
20. DVS should identify the most cost-effective and customer-friendly way to utilize **kiosks** for driver and vehicle transactions.
21. Minnesota law should be amended to allow **online applications for replacement of a Class D-Regular driver's license**.
22. DVS should expand the use of **pre-applications** to all possible, relevant areas and should consider making it mandatory where appropriate.

23. DVS should adjust their policies and practice to **automate as many approval transactions as possible**.
24. DVS should determine the proper level **field defaulting** needed by transaction type and explore additional **differentiated user levels** in MNDRIVE.
25. Deputy Registrars should have increased visibility to and influence on the **MNDRIVE enhancement** process.
26. Minnesota law should be amended to enable movement from physical to **digital artifacts** for vehicles (e.g., electronic titles) and drivers (e.g., mobile driver's license).
27. DVS should engage a learning consultant and create a **content strategy and communications campaign** to meet customer needs, including a feedback loop for continuous improvement and evolution.
28. DVS should provide additional **training and clear guidance regarding permissible use of records** and should enable **in-application notation** of usage other than for paid transactions.
29. Minnesota law should be amended to clarify that **accessing a record to resolve an issue is permissible** even when it does not result in a transaction and to add an **appeals process** for those whose access is revoked.
30. Deputy Registrars and DVS should consider what **security measures** are appropriate at each location, including the possible need for a security officer or for CCTV cameras with recording capabilities.
31. DVS should offer **training in de-escalation and negotiation techniques** to all public facing staff.

Deputy Registrars

Minnesota's Deputy Registrar⁵ model works, but requires adjustments to achieve the customer-centric model outlined above. Each community benefits when it can easily access a full suite of Deputy Registrar services, performed with a high degree of service and efficiency. In contrast, inaccessible, unaffordable, inefficient, inaccurate services cause harm. It is in the best interest of Minnesotans that its wide distribution of Deputy Registrar offices remain viable, service-oriented and well-aligned with customer self-service opportunities.

DEPUTY REGISTRAR OVERVIEW

Minnesota's Deputy Registrar network currently includes 174 offices throughout the state. Just over half of the offices are public (operated by cities or counties) and the others are owned and operated by private citizens. While any Minnesotan can transact at any Deputy Registrar office, Minnesota's approximately 5.6 million residents typically have a Deputy Registrar office within 15 miles of their home.

Each Deputy Registrar responds to the unique needs and opportunities of its community, but there are several similarities across the independently run offices. Deputy Registrar revenues are primarily driven by filing fees, and costs are primarily driven by staffing and by facility and equipment costs. As of 2021, public Deputy Registrars are more likely than private Deputy Registrars to offer all services in the Deputy Registrar suite, and they are also more likely to have local tax-payer subsidization, as their operating costs exceed the revenue that they collect from filing fees. Private Deputy Registrar owners are generally less tolerant of subsidizing ongoing losses and more likely to adjust their operating model to make it profitable by reducing service offerings.

While their profitability challenges are similar, each Deputy Registrar experiences them in different ways. In spite of having similar underlying performance levers (such as common technology and filing fees), the Deputy Registrars experience a range of profits from office to office, even if owned by the same entity. Their differences are generally correlated to: (1) the mix of transactions that each Deputy Registrar performs (e.g., acting as full vs limited driver's license agents); (2) their individual business practices (e.g., requiring or offering appointments); (3) how they respond to the unique needs of their community (e.g., ensuring staff are multilingual); and (4) how they balance the cost and expertise of their workforce. While the degree of impact varies, all Deputy

⁵ The term 'Deputy Registrar' in this report is meant to include activities of both Deputy Registrars and Driver's License Agents.

Registrars provide evidence of recent reductions in profitability, with operating losses for some Deputy Registrars.

It is important to note that while Deputy Registrar profit pressures are somewhat coincident with the timing of the new MNDRIVE system, this is not the primary driver of the pressures or fee changes recommended below. Some of the pure technology effects (generally described as “more clicks” and “more training time”) are temporary and resolvable without long-term fee or Deputy Registrar structure changes, and they are addressed in more detail in the DVS section below. Other effects that arrived with the technology are actually intentional process and service changes that will be lasting and are included in the list below as threats to the sustainability of Deputy Registrars if they are not addressed with additional compensation or fees.

The pandemic has created profitability pressure due to closures, safety protocols and unexpected shifts in customer and employee behavior, some of which may be temporary (e.g., closures), some of which may be more permanent (e.g., customer preference for less congested space and contactless transactions).

Most importantly for this study, the IER identifies the following as threats to the sustainability of Deputy Registrars that are expected to persist in spite of technology improvements over at least the next several years.

- All Deputy Registrar offices find that for select transactions, **more up-front interaction with customers** is required to ensure that the information related to the customer request is comprehensive and accurate. Note that this is enabled as part of the workflow of MNDRIVE, but it is an intentional change in process versus a system “bug”;
- Many Deputy Registrar offices find that a **higher percentage of their transactions are complex and labor-intensive** as the easier, higher-margin transactions have moved online or have been recruited by other offices;
- Many offices are experiencing a **higher percentage of ‘no-fee transactions’** with more phone calls and in-person conversations purely customer service interactions that result in neither a transaction nor a filing fee in part due to the shift to online self-service (expected to be permanent), and in part due to other Deputy Registrar offices, exam stations, and the customer call center restricting or diverting customer service calls (some expected to be temporary).

To enable Deputy Registrars to provide increasingly effective service for Minnesotans in the face of these persistent challenges, the IER recommends adaptations and offsets highlighted below.

ENCOURAGING FULL-SERVICE AND ENSURING PERFORMANCE

Minnesota is one of 20 states that serve motor vehicle licensing and registration needs through a network of Deputy Registrar offices. In addition, Minnesota is like 14 other states that also provide drivers' licenses through a deputy network. Minnesotans have typically found a Deputy Registrar office within a short drive of their home, and they find an increasing number of services offered online or by mail.

When Minnesotans are interacting with the Deputy Registrars located across the state, very few likely understand that this extension of driver and vehicle services is not actually a department within DVS. In many cases, the Deputy Registrar counter staff are the only in-person, customer-facing support a Minnesotan sees. Their perception of DVS customer experience is heavily tied to the Deputy Registrar model.

A real example of this manifests itself in a transaction where the customer mails in or goes online to renew their vehicle registration with DVS and then drives to their local Deputy Registrar office to pick up tabs when they do not arrive within a timeline that is acceptable to the customer. The customer views the two as one and the same, but the Deputy Registrar bears the cost of fulfillment and does not receive the fee.

The Deputy Registrar network offers a degree of convenience to Minnesotans. But without adaptation, it will be hard to sustain. More Deputy Registrars have recently ceased (or are considering ceasing) time consuming services, such as Real IDs, reporting that the filing fee does not cover the cost of performing the transaction. Some Deputy Registrars take actions to avoid or restrict no-fee transactions. Many discourage self-service, because it currently erodes their profitability.

While the IER team strongly supports self-service, it finds evidence that for the foreseeable future, Minnesota communities also need a local Deputy Registrar office for their most complex transactions and to serve those who require the additional time and attention of face-to-face service at a counter due to digital literacy and comprehension, language, physical, cognitive and other challenges.

Therefore, it is in the best interest of Minnesota that local offices remain viable. In the interest of ensuring all Minnesotans have easy access to the full suite of Deputy Registrar services, performed with a high degree of service and efficiency, we believe the Deputy Registrar contract should be rewritten and fees adjusted to encourage full service. In this section, we will describe those offices as *Full-Service Deputy Registrars*. Note that *Full-Service Deputy Registrars* offer unrestricted access to all Deputy

Registrar services, with the likely exception of more specialized vehicle prorate⁶ services and the administration of examinations.

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- 1. DVS, in consultation with the Deputy Registrars, should revise the Deputy Registrar contract to encourage all Deputy Registrars to become or remain Full-Service Deputy Registrars.**
-

This encouragement may include greater filing fees for the most complex transactions, as well as online revenue sharing uniquely available to *Full-Service Deputy Registrars*. This includes incentives for services already offered by Deputy Registrars and related services that Deputy Registrars are not currently allowed to offer, like driver and vehicle reports and records.

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- 2. Minnesota law should be amended to allow Full-Service Deputy Registrars to offer expanded services including, but not limited to fulfilling requests and receiving filing fees for: 1) driving records; 2) crash reports; 3) vehicle records, to the greatest extent allowed by federal law.**
-

This change offers additional, convenient service to Minnesotans. It also uniquely incentivizes Full-Service Deputy Registrars by offering the opportunity to collect a fee tied to some of the customer service calls that they field today without compensation, and it allows exam stations that currently handle these requests to focus on exams.

Deputy Registrars also report that some questions they currently handle in person could easily be answered over the phone, reducing the need for a customer to come to the Deputy Registrar office to obtain the information. However, a data practices law passed in 1965⁷ prohibits sharing motor vehicle information over the telephone. Technology has changed significantly since that time, and with the right information customers can look up much of this information online. Use of multi-factor authentication could address any concerns that an individual calling is not who they say they are. It is time to revisit the purpose behind this law and consider revising the language.

⁶ Prorate services refer to the international (or multi-jurisdictional) registration and fuel tax allocation for commercial vehicles. Only a small number of Deputy Registrars currently offer these services.

⁷ Minnesota Statutes 2021 168.345 currently prohibits sharing information about vehicle registrations over the phone.

3. Minnesota law should be amended to allow Deputy Registrars to provide appropriate and proper customer service via the telephone.

DEPUTY REGISTRAR FEES

Most Deputy Registrars describe a recent reduction in profitability that makes their current business practices unsustainable: the *filing fees* retained from certain transactions no longer offset Deputy Registrar administrative costs. Review of profit & loss statements, confidentially submitted to the IER, indicate that the issues are particularly acute for REAL ID and Enhanced Driver's License transactions.

4. In 2022, Minnesota law should be amended to increase the Filing Fee for driver's license applications.

DRIVER	Current Fee	New Fee
New Application for a Standard Class-D Driver's License	\$8	\$11
New Application for a REAL ID or an Enhanced Driver's License	\$8	\$16
Driver's License Renewal (of any type)	\$8	\$11

The primary driver for the filing fee increase is fair compensation for Minnesota's newest and most complex transactions, particularly for REAL ID and an Enhanced Driver's License. Today's *filing fee* for all licenses is the same: \$8. This was considered acceptable, on average, when the majority of transactions were renewals of a Standard Driver's License. Today, REAL ID and Enhanced Driver's License require approximately twice the transaction time on average versus a Standard Driver's License, and significantly more no-fee customer visits related to impermissible documentation. This fee has become unsustainable as the percentage of REAL ID and Enhanced Driver's Licenses (and more stringent requirements for up-front documentation) increased.

The secondary driver for the filing fee increase is the new role of the Deputy Registrar which has evolved as part of MNDRIVE. Rather than simply collecting and submitting a customer's as-is (accurate or inaccurate) paperwork, MNDRIVE requires that Deputy Registrars work with customers to validate and accurately scan and submit all required information. This up-front validation enables back-office (DVS) efficiency, and also

results in much faster and accurate results for Minnesotans. Additional efficiencies that shift work from the Deputy Registrars to Dealers (for vehicle transactions) and to customers (for driver transactions) offset to some degree the additional work Deputy Registrars are doing.

The IER team chose to recommend rate increases for the most time-consuming transactions. In general, vehicle-related transactions still offer fair compensation, based on P&L, system timing and survey results.

INCREASING ONLINE TRANSACTIONS

For the benefit of all Minnesotans, we must accelerate toward self-service for driver and vehicle transactions. Right now there are very few transaction types available online. The most common is for tab renewal and though the pandemic rapidly increased the shift to online transactions, there are still far more transactions happening in person with a Deputy Registrar and through the mail. To minimize cost and maximize customer experience, we must make more transaction types available online and drive more activity online for those that are currently available.

As front-line influencers, and collectors of contact information, Deputy Registrars will be a critical part of driving progress. Today, any Deputy Registrar support for self-service is a sacrifice: eliminating revenue for quick and valuable transactions (such as tab renewals) that otherwise offset time spent on more complex transactions (including Enhanced Driver's License and REAL ID).

While DVS has rising costs for fulfilling an increasing number of online and mail-in transactions, Deputy Registrars experienced the revenue loss of these high-margin transactions from their portfolio. In many cases, these "lost" transactions were critical to the Deputy Registrar's profitability. And still they continue to field questions and provide no-fee customer support related to these transactions. Just as DVS needs funding for the extra fulfillment work they are completing, Deputy Registrars need to be compensated appropriately for their share of the work and also incentivized for driving more activity online. This is true for vehicle transactions that are currently available online, and it may be appropriate for additional transactions that will inevitably be available online in the future as well.

5. Minnesota law should be amended to allocate 25-50% of the filing fees for mail-in and online vehicle transactions to Full-Service Deputy Registrars, incentivizing promotion of online activity.

Incentives should be established to encourage and reward Deputy Registrars for collecting online contact information, advocating for self-service, and providing ad hoc help for self-service customers who have questions or need in-person assistance. Self-service reduces strain on the system by freeing up in-person capacity for those who truly need it.

By default, the incentive should be directed to the customer's nearest or local Full-Service Deputy Registrar office. By limiting eligibility to Full-Service Deputy Registrars, DVS recognizes the financial risk, community value and influence assumed by the Deputy Registrar offices that are offering the full suite of services, ensuring a more robust customer experience, and moving Minnesota toward more cost-effective, online options.

With the combination of updated fees and incentives recommended in the sections above, the Deputy Registrars will be better positioned to provide sustainable, full-service licensing, titling, and registration services both in-person and online for their community.

The IER recommends no other changes to the Deputy Registrar model, and next turns its attention to exam stations, another place directly impacting the customer experience.

Exam Stations

EXAM STATION OVERVIEW

By law, each county must have an exam station or be next to a county that has one and road test appointments must be available within 14 days of a request. Pre-pandemic, there were 93 exam stations statewide, including hub and satellite locations within 10 exam station regions. Each region has at least two hubs but most had three or more. Each hub had 2 or more satellite locations, typically staffed locally and open for limited days and hours.

During the pandemic, all but 15 exam stations were closed. Though the state approved taking the knowledge test remotely, the backlog grew for both knowledge tests and for road tests, as availability was very limited. It has improved greatly, but backlogs persist.

The Legislature has furnished supplemental funds and authorization to re-open all 93 stations. As this report is being written, the re-openings are underway.

Still, the question remains: what is the right number of exam stations to serve Minnesotans?

The IER is not the first to examine this question. The Office of the Legislative Auditor issued a report in March 2021 directed at this question and several others. Minnesota Department of Management and Budget (MMB) wrote a memo on November 7, 2019, making numerous suggestions regarding exam station capacity and efficiency.

The IER took all of the above recommendations under advisement in addition to the information gathered through interviews and site visits in making its recommendation.

6. We recommend that DVS should maintain between 40-50 exam stations.

We believe this number of exam stations will provide good coverage and at the same time provide some efficiencies over the current number.

During the pandemic, in an effort to reduce the backlog of exams, DVS initiated weekend hours for Metro based exam stations. While this helped reduce the backlog, it further complicated staffing as many staff and prospective employees did not want to work weekends. The expanded hours should be reevaluated to ensure the benefit still exists while exploring additional ways to reduce the exam backlog, noted below.

The IER believes the hubs are generally in the right locations and that there should be enough satellite locations to meet the legal requirement regarding resident proximity. Satellite locations are essential to cover a large state like Minnesota, to cover rural areas effectively. Lower demand in those locations requires that satellites are open more limited days and/or hours, but a good customer experience requires a consistency that allows for customers to plan visits. For example, a given satellite office might schedule appointments on Mondays from 10:00 to 3:00.

DVS sometimes staffs satellite locations from hub locations, with examiners traveling to the satellite location on select days. Travel reduces staff efficiency, with as much or more time spent on the road as administering exams. When both hub and Satellite locations are staffed to approved levels, with staff based in the right locations, the stations are poised to provide good service to Minnesotans without long backlogs.

Consolidation from 93 locations to 40-50 will be challenging for the state. As and when location closures are contemplated, DVS should ensure adequate communication and public notice of their plan to Minnesotans.

REDUCING EXAM STATION BACKLOGS

Reducing the number of exam failures (both knowledge and driving) would reduce the exam volume and take pressure off the system. Some failure is to be expected but all failure volume creates extra strain on the system. We saw an alarming number of failed attempts and believe there should be more encouragement to examinees to study and practice before taking the test. This could be done by making available online study support materials for the most commonly missed questions and skills.

Tests are complimentary for the first two attempts. The IER questions whether the cost of the third and subsequent attempts is high enough to incentivize proper preparation. If a review yielded a recommendation that a fee change would be helpful and not overly punitive, legislative changes would be required.

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- 7. DVS should explore methods to reduce exam retakes, especially after the second “free” retest, including how to support learning and whether to raise the fee for subsequent road and knowledge tests after the second failed attempt.**
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Applicants under 18 taking the Class D are required to take Driver’s Education through a DVS certified training school. DVS should attempt to reduce failures by holding

driving schools accountable for the pass rate of their students and investigating student failure rates when they occur at higher levels at a given driving school.

8. DVS should track and share student pass rates for each certified driving school and investigate high student failure rates when they occur for a given school.

Another way to reduce the volume of testing is to change the requirement for testing. Minnesota requires drivers transferring their license from another state to take and pass a written knowledge test before being given a Minnesota driver's license. We believe this is unnecessary and agree with the many states that do NOT require it.

9. Minnesota law should be amended to eliminate the requirement that Class D-Regular licensed drivers (21 and over) from other states take the knowledge test before receiving a Minnesota license (including with a motorcycle endorsement).

Though not directly related to exams themselves, exam stations also handle license renewals, along with Deputy Registrars. Handling applications at the counter, for a new license or for a renewal, takes examiners away from their primary responsibility of administering exams. We can safely and effectively reduce the volume of this work by extending the validity of a driver's license.

A Minnesota driver's license is currently valid for four years, which is the shortest license validity in the country. Out of 35 states that responded to the survey, At least 14 states offer a driver's license that is valid for eight years and 7 states offer a validity of six years. Several more offer licenses valid for five years. We suggest Minnesota adopt an eight year period of validity.

10. Minnesota law should be amended to extend the validity of a Class D-Regular driver's license from four years to eight years.

Finally, the pandemic produced an environment where innovation was necessary in order to offer services and maintain public safety. This included allowing remote proctoring for knowledge testing and leveraging certified third parties to administer knowledge tests. The IER believes these are valuable ideas, in keeping with our goal of creating a multi-channel customer experience, and they should be continued.

Additionally, third-party road testing for Class D licenses should be allowed, as it is for CDL road testing. Where demand significantly outpaces supply, alternative options should be considered, and in this case third parties could potentially alleviate the issue of the backlog and seasonal spikes in need. There are important considerations related to certification of third-parties though, and DVS must ensure proper guardrails are in place.

11. DVS should seek authority to leverage certified and impartial third parties for administration of knowledge and road tests, where and when needed.

OLA REPORT ON EXAM STATIONS

The OLA did an exhaustive evaluation report in March 2021. The IER would like to affirm their Key Facts and Findings as shown below and reiterate the OLA Recommendations with special emphasis on leveraging data from the state demographer and appropriate software to more accurately forecast demand.

OLA Report on Exam Stations Key Facts and Findings

- The Department of Public Safety's Driver and Vehicle Services Division (DVS) operates Minnesota's driver examination (exam) stations.
- In 2019, DVS administered more than 282,000 knowledge tests and 136,000 road tests for the Class D license - Minnesota's Standard Driver's License. Note: 45% are done in three big offices.
- To address COVID-19 safety concerns, DVS consolidated from 93 to 15 exam stations in May 2020. This saved staff travel time and increased the daily number of road tests.
- Following the station consolidation in May 2020, the location of DVS exam stations no longer fully satisfied a legal requirement to make Class D exams available either in, or adjacent to, each Minnesota county.
- DVS has been unable to consistently satisfy a requirement in law that establishes a maximum wait time of 14 days for Class D road tests. One aspect of the requirement, however, is unclear.
- Over the past two years, DVS has improved its exam-scheduling process for Class D road tests.

- Though it lacks the explicit legal authority to do so, DVS has allowed people to take the online Class D knowledge test in their homes.
- Additional changes could improve road-test administration or road safety, but they also pose challenges.

DVS has completed several of the OLA recommendations and is in the process of fulfilling others.

12. DVS and the Legislature should continue to fulfill the OLA recommendations in the March 2021 report on exam stations.

OLA Report on Exam Stations Recommendations

- The Legislature should clarify the requirement that an applicant receives a Class D road-test appointment within 14 days of request.
- The Legislature should clarify whether individuals should be allowed to take the online Class D knowledge test at home.
- DVS should (1) continue to strive to meet the statutory 14-day goal on road-test appointments and (2) measure “next available appointment” at the time a customer schedules an exam.
- DVS lacks a systematic approach to forecast demand for Class D road tests.
- DVS has experienced persistent staff shortages at exam stations and has struggled to fill key exam-station positions in a timely manner.
- DVS should develop a robust method to regularly forecast demand for Class D road tests.
- DVS should identify alternatives to relying on extensive, long-term staff overtime to increase its capacity to conduct road tests.
- DVS relied on extensive staff overtime to help reduce the 2020 backlog, which is not sustainable long term.
- DVS should reopen exam stations strategically at the end of the temporary consolidation that began in 2020.

Driver and Vehicle Services

Over the past five years, a significant amount of positive change has been introduced by DVS to improve performance and services offered to Minnesotans, one of which has been the rollout of MNDRIVE.

Improvement projects significantly impact how people work on a daily basis. Achieving desired project outcomes requires that the workforce expected to perform new services understand what is changing & how it impacts them, and build the necessary knowledge to perform successfully. Change adoption does not happen overnight. Knowledge and ability need to be embedded throughout the ecosystem.

With the MNDRIVE project, DVS created artifacts to support the knowledge build and built in checks and balances to ensure the system was functioning as desired. As learning occurred, adjustments were made to system configurations (i.e. increasing automated transaction approval) and continual training and knowledge sharing was necessary to reinforce steps required to successfully deliver the desired outcome. This was all done at the same time that the state faced unprecedented changes that included a global pandemic and other intense conversations in our community. While we cannot fully put these factors fully in our rearview mirror, we can be proud of the progress that has been made in learning and adapting to the changes MNDRIVE required.

This tees us up for the next phase of the change journey, which includes the following.

- Shift toward a **customer-centric service model** that focuses on the outcome desired for Minnesotans and then design processes and measure efficacy through the customer lens rather than the product focused model of today.
- Increasingly leverage **enabling technologies** to reduce volume and manual effort and increase self-service offerings for stakeholders and customers.
- Continue reinforcing and enabling **change adoption** with employees, stakeholders, and customers through a targeted communications and learning-focused change campaign.

SHIFTING TOWARD CUSTOMER-CENTRICITY

DVS has two customer personas to consider in the shift to customer-centricity. The first is the end-customer, all Minnesotans that require driver and vehicle services. The second is the Deputy Registrar staff, who have a critical dependence on quality support from DVS in order to effectively serve the end-customer. In some cases, the two

personas share a common experience, as is the case with the call center and web site that DVS owns and maintains.

Shifting to an environment that considers and values the customer experience will require DVS to establish forums and methods to gather ideas and information about the customer experience - from Minnesotans requiring the services and from DVS and Deputy Registrar staff delivering the services. It will also require DVS to adopt Key Performance Indicators (KPIs) and metrics that will help them understand the current experience and set standards for the desired future experience - and enable governance and reporting to review and share progress and status. This will require changes to current practices to ensure data is reliable and reflects the true resident experience.

13. DVS should implement data and reporting practices to inform customer-centric, data-driven decisions.

Satisfactory performance for DVS leaders, as well as Deputy Registrar and exam stations, should be based on satisfactory progress toward established targets. DVS should review the purpose behind all current functions, identifying the benefit and effort associated with the activities of each function as related to the desired customer outcomes. In some cases, the benefit does not justify the effort exerted. In other cases, more effort (or staffing) is necessary to properly achieve the desired benefit.

Similarly, DVS funding should be associated with the work required and the technology needed. There are several key drivers of cost within DVS. As with the Deputy Registrars, some costs shifted as a result of the pandemic, with a higher volume of calls coming to the central call center and more mail-in and online orders requiring central fulfillment than had ever been seen before - all while adjusting to a new vehicle services system of record. With some of the effects of the pandemic and the launch of MNDRIVE now settling out, DVS is now able to reassess their role(s) throughout the driver and vehicle services ecosystem to set a resource strategy and a technology strategy that delivers the customer experience that Minnesotans deserve - with clear data to support the associated funding request.

14. DVS should conduct a staffing review that balances staff quantity and quality, leverages technology automations and configurations, and establishes performance standards and targets that meet the needs of Minnesotans.

DVS is already thinking about the customer experience as they discuss tactical and strategic deliverables. It will be necessary to increase not only the focus of the organization on measurement, it will also be necessary to focus positions and technology on successfully adopting new practices that measure customer experience. Making this shift will likely require hiring or upskilling for: data analytics and modeling, digital/technology literacy and fluency, and organizational change management to support workers within DVS and the Deputy Registrar offices. These positions likely need to be procured from the industry rather than reskilling existing workers where it is necessary to pivot quickly.

The Current Customer Experience: Call Center and Online Support

Minnesotans' and Deputy Registrars' experiences with the DVS call center includes lengthy wait times and call throttling (a fast busy signal or redirection to an unanswered messaging service telling the customer to call back later). Volume increased dramatically when exam stations and Deputy Registrars began rerouting calls to the DVS call center 18 months ago, which has potentially changed customer behavior more permanently due to the length of time this behavior was reinforced. The volume problem was compounded when busy staff did not have enough time to understand and adjust to MNDRIVE project enhancements and legislative changes that occurred, which affected staff's ability to provide answers to customers. In order to meet volumes and reduce backlogs, mandatory overtime has been implemented on multiple occasions, which contributes to staff burnout and inefficiency and knowledge loss through attrition.

As a result, Support Services is currently not delivering to service levels desired by Minnesotans and the Deputy Registrars. In 2021, the average hold time for customer and counter staff to get questions answered was more than 30 minutes for 42% of the weeks measured. Customers are likely unsatisfied with this experience, as exhibited by a 48% call abandonment rate and evidence of customers waiting 20-40 minutes before dropping a call.

The following are examples of desired customer service and outcomes for the call center:

- Communicating the estimated wait time within the first 30 seconds of a call
- Being able to request a same-day call back without losing their place in the queue
- Being given other options like online chat or a searchable knowledge base
- Ensuring data integrity and reporting efficacy by measuring and monitoring all customer calls (i.e. remove call throttling) and then establishing a baseline measurement and target state desired

Minnesotans and Deputy Registrars report that DVS web services need improvement to increase browsability, information accuracy and quality of search results. Part of the challenge is that a network of sites, many of which are not managed by DVS, lead to inconsistent information available online. To Minnesotans, these are all viewed as DVS sites. From a customer experience perspective, call center volume would likely be reduced if customers were able to find the right information online quicker, resulting in improvements to customer satisfaction across both call center and web services.

The importance of web services will be discussed more as we explore the benefits of a content management strategy supporting the move toward MNDRIVE effectiveness and new technology adoption later in this section.

The Current Customer Experience: Deputy Registrars

With Minnesotans unable to differentiate between their customer experience at a Deputy Registrar's office (public or private) and DVS, it is apparent that DVS is critical to the success of the Deputy Registrar model and vice versa. At the end of the day, providing solid support and customer experience for the Deputy Registrars will result in better outcomes and experience for all Minnesotans as the Deputy Registrars are equipped to provide outstanding counter service.

By contract, Deputy Registrars are given full authority to process motor vehicle transactions and driving credentials and full responsibility to do so in accordance with the law. They have always been expected to complete transactions accurately and completely, but many admitted that because of the process, they were less careful, knowing that all transactions would get a second look at DVS.

MNDRIVE now forces Deputy Registrars to conduct a more careful review, which takes time at the counter with the customer present. While DVS must monitor their performance to hold them accountable for the accurate and timely completion of

transactions, the nature of the new MNDRIVE process enables a reduction of 'rework' while still maintaining confidence in the quality of the data.

In keeping with the recommendation for modernizing the Deputy Registrar contract, DVS must clearly articulate Deputy Registrar performance and service standards. This should include not only expectations about the services that Deputy Registrar offices offer but should also consider the desired customer experience outcomes for Minnesotans and the role that DVS and the Deputy Registrar each have in delivering an exceptional customer experience to Minnesotans.

A modern Deputy Registrar contract should be supported by a new Deputy Registrar Performance Scorecard that reports on KPIs related to current customer experience, including things like inventory control, customer satisfaction, time spent per customer interaction (which may or may not lead to a MNDRIVE transaction), training hours, and quality of data entry. This would enable DVS Deputy Liaisons to better support performance improvement areas and provide the right training opportunities to the right staff members across the end-to-end process flow.

15. DVS, in consultation with the Deputy Registrars, should identify performance and service standards and create a Deputy Registrar Performance Scorecard that monitors user performance to drive a consistently positive experience for Minnesotans.

As the IER further contemplates the codependency of DVS and the Deputy Registrars, with the Deputy Registrars many times being the face of DVS in the customer's eye, it is evident that an additional level of support for the Deputy Registrar may be warranted in service of a Minnesotan standing at the counter.

With the initial roll-out of MNDRIVE, Deputy Registrars were able to connect with a DVS human agent via a live chat function, which has since been disabled. The alternatives are either to call into the Public Information Center, which may require 20-40 minutes of hold time, or to send an email DVS, which may provide a response in 24 hours, or to attempt to search the DVS knowledgebase, which may not have the right information to easily answer specific questions.

As a result, Minnesotans are waiting a long time for service or having to return to the Deputy Registrar's office multiple times to complete their transaction. It is a frustrating experience for all involved. Several Deputy Registrars are asking that the quick method of reaching an agent at DVS via chat be re-established for urgent questions and especially for times when they have a customer at the counter.

16. DVS should provide a rapid response communication method for situations where Deputy Registrars need support and a Minnesotan is waiting.

Similarly, many of the phone calls and emails DVS fields from Deputy Registrars and Minnesotans alike could be handled by a smart chat bot or at least by a reliable single source of knowledge. Searchable human knowledge articles should be replaced with bots that learn with artificial intelligence and machine learning.

In addition to going for driver and vehicle transactions, many Minnesotans go to their local Deputy Registrar office to title or register boats, ATVs, and snowmobiles. These transactions are governed by the Department of Natural Resources (DNR), not DVS, but FAST, the technology underlying MNDRIVE, has functionality to support these registrations (and it is used in other states). Minnesota currently leverages an antiquated DNR system, which requires the Deputy Registrars to toggle between systems. In the interest of encouraging efficient use of enterprise resources across state agencies, it is worth noting that the FAST system is also used in other states for transactions related to housing credits and child support.

17. DVS should engage DNR to review the MNDRIVE system as a potential solution to replace the DNR system for boat, ATV and snowmobile registration.

Quality customer service requires that Deputy Registrars and exam stations remain fully staffed, with staff trained on a wide variety of transactions. Certain transactions can only be completed by individuals who have completed a background check. Both Deputy Registrars and exam stations rely on rapid completion of a background check.

Everyone fully supports conducting background checks as a prerequisite to MNDRIVE system access, and DVS has provided a cost-effective option that is helpful for many Deputy Registrars. In today's competitive labor market, Deputy Registrars and exam stations are increasingly losing talented candidates because of the length of time the DVS process takes to conduct background checks - reportedly 30-60 days. Compounding, the IER found cases where background checks were completed locally, as a condition of employment with the county (through the same source used by DVS), and run a second time by DVS, wasting both time and money. Some flexibility may be warranted here to hire staff required to deliver a good customer experience.

18. DVS should explore ways to speed up background checks of new employees at DVS (including exam stations) and Deputy Registrar offices, including possibly using a police department or county sheriff who may be able to obtain faster approval.

EMBRACING TECHNOLOGY, SELF-SERVICE OPTIONS

The global pandemic dramatically accelerated the pace of digital change as customers shifted toward leveraging digital channels for all manners of business and personal life. Survey respondents are now three times more likely than before the pandemic to say that more than 80% of their interactions are digital in nature. With proper support from the Legislature and from Deputy Registrars, DVS can ride this sea of change.

The IER recommends that we embrace available technology that will drive efficiencies within the business processes, reduce volume and relieve pressure on the systems while at the same time providing a better customer experience.

DVS is the primary driver of the digital and technological change implementation timeline, with responsibility to prioritize MNDRIVE enhancements that eliminate pain points, speed up delivery and optimize productivity and quality for Minnesotans and for Deputy Registrars.

Embracing Technology: Self-service

DVS recognizes there is still a high volume of simple transactions completed in person at a Deputy Registrar office that could be completed through online self-service by Minnesotans. There are many reasons why someone may need to go to the local Deputy Registrar office, but many of the transactions currently completed onsite, after waiting in line (sometimes for a long time), could easily be completed online. In some cases, customers are simply unaware of the possibility of online self-service. Some may be unwilling to pay the convenience fee, or they might be unable to navigate the system on their own. In other cases, customers are dealing with a more complicated transaction that requires in-person assistance. In still other cases, the option for self-service is not made available.

Right now, the most common self-service transaction is for tab renewal. There are currently four options for tab renewal:

- In person at a **Deputy Registrar office**, with immediate onsite fulfillment;
- **Online Self-service** through MNDRIVE, with DVS fulfillment and tabs mailed to the customer's home, typically within 2 days;
- **Mail-in** renewal, with DVS fulfillment and tabs mailed to the customer's home after receipt of the application is processed, typically within 7 days;
- **Kiosk Self-service**, currently in a pilot, with immediate fulfillment.

It is worth noting that during the pandemic DVS saw a three-fold increase in fulfillment for tab renewals. This was a clear benefit to customers, but it drove negative financial impact for both DVS and Deputy Registrars. For online and mail-in transactions, the customer pays the same filing fee, but that filing fee goes into the vehicle fund and cannot be spent unless and until appropriated by the Legislature. DVS costs have escalated as they are fulfilling orders in unprecedented volumes and absorbing substantially higher labor and materials (order fulfillment, data validation, postage) costs. With changes to the types of transactions available online and also the increasing volume of online and mail-in transactions, it is difficult, if not impossible, for DVS to forecast the required fulfillment budget more than a year in advance. For this reason, fixed costs for online and mail-in fulfillment should be appropriated by the volume of transactions, equal to the cost of fulfillment.

19. DVS fulfillment expenses for mail and online transactions should be funded from a direct appropriation based on the number of transactions DVS completes and the true cost of fulfillment, rather than from their general operating budget.

Though limited data is currently available, kiosks could become the most cost-effective and customer-friendly option, with immediate fulfillment and little to no DVS or Deputy Registrar intervention required. Current legislation allows for a convenience fee of up to \$5 for the kiosk, which is earmarked for the kiosk vendor. The IER Team suggests care be taken in considering the amount of the filing fee for kiosk transactions, as fulfillment is no longer completed by either a Deputy Registrar or DVS. However, both DVS and Deputy Registrars will continue to hold accountability for questions, concerns and advocacy related to the kiosk transactions, requiring at least a portion of that filing fee be allocated for support.

Kiosks become even more cost-effective and more customer-friendly when they are used for multiple transactions and DVS partners with other agencies, such as DNR. Kiosks could be employed for a variety of licenses (driver, hunting, fishing, etc.) as well as for registering a variety of vehicles and vessels (car, boat, ATV, snowmobile, trailer, etc.).

20. DVS should identify the most cost-effective and customer-friendly way to utilize kiosks for driver and vehicle transactions.

While Kiosk is perhaps the most cost-effective, it is important to note that mail-in renewal (*where DVS bears the financial cost of every step in the workflow - from notification to data validation and processing to fulfillment*) is clearly the most expensive method and should be discouraged or eliminated in favor of online or kiosk self-service. Volume and costs should be closely monitored.

There are other transactions besides tab renewals that could also be available for self-service. For example, a majority of driver's license volume for relatively simple and straight-forward transactions is driven by the Class D - Regular driver's license today. Minnesota could begin the change journey by allowing *replacement* of these credentials, including for address changes or loss or damage, based on an online request. Currently, this is restricted by law.

21. Minnesota law should be amended to allow online applications for replacement of a Class D-Regular driver's license.

Even where the full transaction cannot yet be made available online, we have still seen success with online self-service. For example, the pre-application for a new REAL ID or Enhanced Driver's License speeds up in-person transactions and helps ensure Minnesotans are able to complete their transaction in a single visit to a Deputy Registrar office or an exam station. We commend this service and believe DVS and Deputy Registrars alike should heavily promote the pre-application. It reduces the work for DVS and Deputy Registrars; it reduces customer frustration by avoiding situations where they get turned away for improper documentation; and customers receive their credentials faster.

22. DVS should expand the use of pre-applications to all possible, relevant areas and should consider making it mandatory where appropriate.

Embracing Technology: Automation in MNDRIVE

Before MNDRIVE was fully operational, DVS played an important role in processing transactions, imaging documents and ensuring all fields were properly populated and fees appropriately calculated. With MNDRIVE, some of the work DVS previously completed is either handled by MNDRIVE or completed by counter clerks at the local offices, rendering some of that DVS work redundant. With the bulk of the scanning and validation work now shifted to the Deputy Registrars, DVS must trust them to perform their duties and adjust back-end practices from 100% review of all work to a more periodic review.

Initially, as is necessary with new system implementations, a cautious approach was taken to ensure all transactions were reviewed. As DVS became more confident in the reliability of the system and the user performance, it began to automatically approve transactions, speeding delivery of titles, tabs and licenses to customers. The IER believes there is greater opportunity for automated approval, reducing the level of transaction auditing that is being done, and instead moving to a periodic check of transactions to score the proficiency of a user and/or an office.

23. DVS should adjust their policies and practice to automate as many approval transactions as possible.

Some Deputy Registrar end-users have proven more productive and more accurate than others. Reporting is currently available at the user level by office, and has demonstrated that proficiency grows based on a user's familiarity with the system and their tenure.

Automated approval can be dialed up or down by transaction type and should be set for each transaction based on 1) the risk associated with errors, 2) the likelihood of error, and 3) the hassle of fixing an error. Where all are 'low', 100% of the transactions could be approved automatically, trusting and expecting counter staff to successfully execute according to their contractual responsibility. One transaction that is a prime candidate for 100% automation might be disability placards automatically going to fulfillment without an audit step, because of the low risk, the low likelihood of error, and the ease of fixing an error should it happen. Even when risk, likelihood or hassle is high, it may still

be worthwhile to automate a portion of the transactions, when certain conditions are true, particularly when completed by a user with a high level of proficiency.

Embracing Technology: Improving MNDRIVE Transaction Speed

One of the most common concerns we heard from Deputy Registrars was the number of clicks required to complete a transaction. They would prefer to skip over certain fields (like confirming whether an address has changed, asking if an individual would like to be an organ donor, or requesting an email address) that are not necessary to complete a transaction - or if not able to skip it completely, at a minimum to have the most common answers automatically populated to save time. The IER Team noted that while forcing a review of every field may be frustrating for experienced counter staff familiar with regulations and policy, it is helpful for new users who might otherwise miss gathering important customer information.

DVS could improve the customer experience for Minnesotans and for Deputy Registrars by reviewing the fields required for each transaction to determine where default answers would speed transaction time without unnecessary negative impact. They might also consider the possibility of limiting the use of default answers to proficient users who have proven their knowledge and understanding of the system and rules, through consistent productivity and high quality.

24. DVS should determine the proper level field defaulting needed by transaction type and explore additional differentiated user levels in MNDRIVE.

Embracing Technology: MNDRIVE Reporting & Enhancements

As the IER team was conducting its study, it became clear that improving communication bi-directionally between DVS and Deputy Registrars was necessary. It would result in customer needs being better understood and hopefully supported. This responsibility would logically fall within the existing Deputy Registrar Liaison roles in DVS. Though there are varying levels of experience and expertise within the group, Deputy Registrar Liaisons are generally well-respected by Deputy Registrars, providing much-needed best practices, improvement tips, knowledge artifacts, and training to meet individual user needs.

As the Deputy Registrar Liaison role adjusts to the new workflow (with more validation being completed up front and less auditing being completed at DVS), their role refocuses on ensuring Deputy Registrars' ability to serve Minnesotans with high quality and timely service. Minnesotans will receive top-notch service when Deputy Registrar

Liaisons are effectively communicating policies and regulations to Deputy Registrars, while actively listening to issues and concerns raised by Deputy Registrars. Today, the Deputy Registrars feel they have less visibility to the enhancement roadmap and ability to influence development priorities than with the MNLARS project. As the primary data entry input for many transactions, and the customer-facing service provider, Deputy Registrars have unique perspectives about needs and opportunities that should continue to be considered in the enhancement prioritization process.

25. Deputy Registrars should have increased visibility to and influence on the MNDRIVE enhancement process.

For example, MNDRIVE reporting generally, and financial reporting in particular, is a source of angst for some Deputy Registrars. DVS should partner with Deputy Registrars to review current reporting needs, especially for day-end closing, to determine if system enhancements are required.

Embracing Technology: Digital Service Offerings

Some of the changes required for an ideal customer experience go beyond enhancements in the current MNDRIVE system. We are increasingly dealing with a digital world, where we are no longer restricted by the limits of paper or regular business days and hours of service. Banks offer electronic statements and online banking 24 hours a day. Retail establishments offer electronic receipts and online ordering. Entertainment venues take electronic tickets. Smartphones offer digital wallets, holding credit cards, loyalty cards, transit passes, and event tickets. Customers not only appreciate these conveniences, they now expect them.

DVS customers of the future might want to apply for credentials online and make an appointment to have documents reviewed and a picture taken. Eventually, customers may never need to come to the Deputy Registrar office, as all correspondence could be handled over digital channels with customers uploading documentation and digital photographs for review and provisioning goes from mail to a digital rendering on a mobile device. This may happen sooner than imagined, given that several states already offer a digital license, and Apple and Android phones are already offering operating systems compatible with ISO 18013-5, setting interface specifications for mobile identification.

Digitization will go even further, encompassing registration, titles, liens, disability placards, and crash reports. These product options would be beneficial to customers and DVS by reducing paper and physical storage and reducing the risk of losing the

source of record. At least 20 states process electronic titles already, with lower material, labor, and postage expenses as a result. Anyone who wants a printed title is still able to attain one, at their own expense.

26. Minnesota law should be amended to enable movement from physical to digital artifacts for vehicles (e.g., electronic titles) and drivers (e.g., mobile driver's license).

REINFORCING & ENABLING CHANGE ADOPTION

A final but extremely important and often forgotten or deprioritized step in embedding the kind of change we are talking about above is reinforcing and enabling change adoption with employees, stakeholders, and customers through effective knowledge management and communications. At the most basic level, this is about clearly articulating what is happening and what behavior is expected. This progresses to providing enabling support for employees in building knowledge and resilience necessary to successfully adopt the change expected.

Enabling Change: Communications & Knowledge Management

DVS is responsible for ensuring appropriate knowledge is captured to provide adequate training for Deputy Registrars and information for Minnesotans. Much of this knowledge is structured around procedures and policies (how to process a transaction) and service information (which services are offered in which locations, at what times).

Knowledge Management - the process of capturing, distributing, and effectively using knowledge - is a key contributor to great customer service. Customers rely on DVS to provide information to support the customer journey, which includes digital channels like websites, email, or chat and traditional channels like phone support and Deputy Registrar counter service. Doing this well means that customers understand what is required of them and come prepared, resulting in a better and more efficient experience. An example of this would be providing useful adult education for driver's exam preparation based on questions that are frequently missed or result in test failure.

Today, customers are confused and frustrated by the content or knowledge contained across the many channels. A variety of web sites have differing information about service offerings and hours of service for different locations. Navigation and searching on web sites is less intuitive than they could be. Phones are not being answered in a timely manner, if at all. Email may not be answered for a day or longer. Chat was previously available and now is not. The TAMI bot that was rolled out does not leverage

learning technology, meaning it only answers questions for which answers have been manually supplied by DVS.

These are solvable problems but require a focused effort to create a content knowledge management campaign and communications strategy that is based on customer needs and lives and adapts as customers do. As we consider increasing adoption of online services, the need for a content knowledge management campaign and communications strategy will require thoughtful change management for customers as well as DVS and Deputy Registrar team members.

Searchable knowledge bases are a solid investment in customer support, allowing questions to be answered at any time of the day or night without the need for a human to answer a phone or email enquiry. An investment in a bot that learns over time should be explored.

27. DVS should engage a learning consultant and create a content strategy and communications campaign to meet customer needs, including a feedback loop for continuous improvement and evolution.

Enabling Change: Data Privacy

There is federal law⁸ governing the handling of driver and vehicle data. Minnesota Law⁹ also restricts access to driver and vehicle service information and requires logs showing 'which data are entered, updated, accessed, shared, or disseminated' to ensure compliance with the data privacy provision. Another Minnesota law indicates that vehicle registration information 'shall not be furnished on the telephone' except to police and state DMV staff.

DVS policies provide further guidance related to data privacy, articulating specific actions which constitute a violation of the law and documenting the procedure to be followed in the case of a violation. DVS policy follows the text of the statute requiring immediate and permanent revocation of access to the driver and vehicle information system for anyone found to be in violation.

Deputy Registrars report that recent enforcement of this law has had a chilling effect within their offices, creating fear among staff that they will lose access and as a result

⁸ The Driver Privacy Protection Act, United States Code, title 18, section 2721 et seq.

⁹ Minnesota Statutes, section 171.12, subdivisions 1a and 7; Minnesota Statutes, chapter 13; Minnesota Statutes, section 168.345, subdivision 1

their jobs. The IER has not uncovered unfair application of this law, nor has there been any evidence that the established procedures have not been followed.

In many of the examples Deputy Registrars shared regarding data access violations, DVS provided notification of the concern, Deputy Registrars provided a response, and DVS completed their audit with a finding that there had not been a violation. Only in cases where there was illegal activity that matched the very purpose behind the law did individuals lose system access. Nonetheless, the uncertainty around the law and policy and the lack of recourse for the user has created concern that must be addressed.

Training and guidance is required. DVS can also pursue system changes that limit the ability of an individual to perform illegal lookups, and that allow users to offer an explanation (within the system, synced with the activity itself) for non-business activity that may trigger concern.

28. DVS should provide additional training and clear guidance regarding permissible use of records and should enable in-application notation of usage other than for paid transactions.

Even the possibility of an appeal or second chance would make users feel more comfortable completing day-to-day activities that might be for a legitimate business purpose but appear from an outside party as inappropriate until investigated further.

29. Minnesota law should be amended to clarify that accessing a record to resolve an issue is permissible even when it does not result in a transaction and to add an appeals process for those whose access is revoked.

Though not specifically called out in the legislation, the DVS policy notes that completing transactions for friends, family members, or oneself is not allowed. Though we found no evidence that this has caused access issues in any office, there was concern about application of this rule to Deputy Registrars in small towns. Exceptions to this rule are allowed if users contact DVS to report what they are doing and note when they start and complete the activity.

Data retention requirements also deserve review. As we shift from a paper to digital environment, we must consider whether paper copies are necessary or if a digital file is sufficient.

Enabling Change: Safety & Security

As we have seen across industries, the incidence of customers voicing their dissatisfaction verbally and sometimes physically is on the rise. The IER is concerned about the stress that is being placed on staff within the call center, exam stations, and Deputy Registrar community by Minnesotans. From a DVS perspective, balancing successful outcomes for customer experience with employee health and well-being requires additional training in de-escalation and negotiation techniques.

30. Deputy Registrars and DVS should consider what security measures are appropriate at each location, including the possible need for a security officer or for CCTV cameras with recording capabilities.

31. DVS should offer training in de-escalation and negotiation techniques to all public facing staff.

Conclusion

Acting on all the recommendations in this report will establish a firm foundation for modernization of the driver and vehicle service ecosystem. We see a future with digital credentials and digital titles, with flexible service offerings in-person, at a grocery store kiosk, or online from anywhere. In keeping with our goal to keep people safe and our roads in good condition, Minnesota should strive to provide high quality service in an efficient and effective way, using appropriate technology along the way.

The state and its agencies have the ability to do great things but often hesitate, which causes a loss of precious time to fix problems. We need to cultivate an environment where we move fast and boldly with fact-based solutions to our most pressing issues, which are more often business problems than IT problems. We must first work hard to reimagine how we deliver our services and then use technology and automation to provide these services. Just because it has been done a certain way for years does not mean it must remain that way. We should expect our knowledge experts that work on issues everyday to be empowered to solve problems, make decisions, and move forward expediently.

The Minnesota Legislature plays an important role in enabling the change that is required. DVS must lead the way in crafting a clear vision for the desired experience for driver and vehicle services and then engage all relevant stakeholders on the journey to achieve the vision.

Glossary

ATV	All terrain vehicle
CCTV	Closed-circuit television
CDL	Commercial Drivers License
Class D license	Standard Driver's License for automobiles
DNR	Department of Natural Resources
DPS	Department of Public Safety
DRBOA	Deputy Registrar Business Owners Association
DVS	Driver and Vehicle Services, a division of DPS
EDL	Enhanced Driver's License - a combination driving credential and (land and sea) cross-border travel document
FAST	FAST Enterprises, owner of the software underlying MNDRIVE
Filing Fee	A fee designated in statute for the cost of fulfillment
IER	Independent Expert Review team, designated by the Legislature
KPI	Key Performance Indicator
MADA	Minnesota Auto Dealers Association
MDRA	Minnesota Deputy Registrars Association
MICA	Minnesota Inter-County Association
MMB	Minnesota Department of Management and Budget
MNDRIVE	Minnesota's licensing and vehicle software created by FAST Enterprises
MNLARS	Minnesota Licensing and Registration System, MNDRIVE predecessor
OLA	Office of Legislative Auditor
PIC	Public Information Center, the call center for DVS
REAL ID	A driver's license meeting federally defined minimum security standards

DPS - DVS Response Letter



Office of the Commissioner

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January 11, 2022

Rick King, Chair, Independent Expert Review

Dear Mr. King,

Thank you to you and your team for the work done on the Independent Expert Review (IER) of the Minnesota Department of Public Safety Driver and Vehicle Services Division (DPS-DVS). We value the professionalism of your team and the time and effort you put into these recommendations. We also appreciate the opportunity to review and comment on the report titled "Driver & Vehicle Services Report of the Independent Expert Review."

DPS-DVS shares and supports the IER focus on service delivery to Minnesotans. All DPS-DVS employees hold a similar goal to provide efficient and accurate service to the 11 million customers we serve each year. We look forward to continued collaboration with our Deputy Registrar partners and the legislature to ensure Minnesotans continue to receive these vital services.

DPS-DVS appreciates the work the IER team has put into this report and looks forward to further discussion and collaboration with the legislature and stakeholders regarding the recommendations. We note that many of the report's recommendations will require significant additional resources to DPS-DVS. As each recommendation is considered, it will be critical to evaluate the resources required and funding sources to ensure that any changes can be implemented effectively.

Deputy Registrars

I am proud of the work DPS-DVS has done to strengthen the relationship with Deputy Registrar partners. DPS-DVS agrees Deputy Registrars play a critical role in delivering services to Minnesotans. Under the current statutes and rules, Deputy Registrars are able to operate as full service driver's license agents. Expanding the services Deputy Registrars can provide, particularly with regard to dissemination of records, would require additional training and oversight to ensure compliance with state and federal data privacy laws. DPS-DVS supports expanding the services that Deputy Registrars can provide. DPS-DVS does not believe that state revenue from mail-in and online vehicle transactions should be given to Deputy Registrars because the entirety of the mail-in and online services workload are created, maintained, and executed exclusively by DPS-DVS.

The IER recommends that Deputy Registrar should have increased visibility to and influence on the MNDRIVE enhancement process. In the most recent rollout of MNDRIVE, Deputy Registrar representatives were active participants in testing and provided critical feedback. Deputy Registrar representatives continue to be involved in the ongoing enhancements to MNDRIVE and are regularly engaging in the process that suggests and prioritizes any enhancements. We look forward to continued collaboration and partnership with Deputy Registrars and believe this should be considered a best practice for technology projects.

The review points out that DPS-DVS is responsible for offering Deputy Registrars training. DPS-DVS currently provides regular training and support for all Deputy Registrars. DPS-DVS also sends regular updates regarding authorized access and disclosure of data, has created training tools specific

Alcohol
and Gambling
Enforcement

Bureau of
Criminal
Apprehension

Driver
and Vehicle
Services

Emergency
Communication
Networks

Homeland
Security and
Emergency
Management

Minnesota
State Patrol

Office of
Communications

Office of
Justice Programs

Office of
Pipeline Safety

Office of
Traffic Safety

State Fire
Marshal

to data regulations, and provides Deputy Registrars' direct access to the DPS-DVS Data Practices Team for individual questions and concerns.

Exam Stations

The IER identifies expanded third-party testing as a potential means to increase the state's overall testing capacity. DPS-DVS remains opposed to third-party testing for Class D skills testing because of its impact on public safety. While DPS-DVS allows some third party testing for commercial driver's license (CDL) skills testing, this is not equivalent to testing novice drivers for initial driving privileges.

DPS-DVS has a third-party proctor program for Class D knowledge testing and has actively promoted this program to expand access to knowledge testing. Currently, 110 driver education programs and other entities are authorized to proctor the Class D knowledge test throughout the state, including some Deputy Registrars. DPS-DVS supports the continued availability of Class D knowledge testing via third party proctors. As we approach the completion of reopening the exam stations closed during the COVID-19 public health emergency, we look forward to continued discussions regarding improving customer experiences at exam stations.

At the direction of the legislature utilizing the one time funding provided for this purpose, DVS is currently reopening all 93 exam stations after reducing locations in response to the COVID-19 pandemic. The IER recommends DPS-DVS maintain between 40-50 exam stations throughout the state. DPS-DVS agrees with this recommendation and with appropriate funding it will allow for better customer service and increased efficiencies at exam stations. When closures are contemplated, DPS-DVS will work with communities including their elected officials to ensure proper communication and public notice.

Driver and Vehicle Services

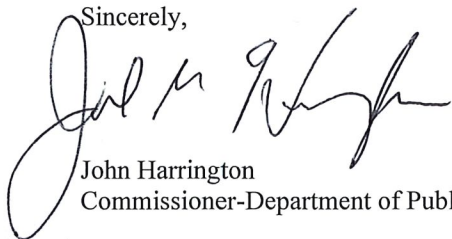
DPS-DVS is in full support of the recommendation to fund expenses for mail and online transactions through a direct appropriation. The COVID-19 public health emergency has shifted the way people renew their vehicle registration. DPS-DVS needs a funding mechanism for these transactions that is agile and allows DPS-DVS to fulfill customer demand for remote transactions without impacting resources and other services at DPS-DVS.

The IER report points out that DPS-DVS needs the right staff in place to provide the best service. DPS-DVS recognizes the importance of filling positions quickly to ensure efficient service delivery to Minnesotans. As part of the reopening of the exam stations that were closed during the COVID-19 public health emergency, DPS-DVS has implemented several processes to fast track the application and hiring process. However, many parts of the required fingerprint background check process are governed by federal laws and rules, such as a prohibition on the sharing of background check information between entities.

Finally as stated in the IER report incidence of customers voicing and physically displaying their dissatisfaction is on the rise. The safety and security of DPS-DVS employees and customers is of the utmost priority for the agency. DPS-DVS has offered de-escalation training to staff in the past and has focused increased attention to identify additional opportunities to ensure safety at exam stations and other customer-facing locations.

Again, we greatly appreciate the opportunity to review and comment on this report and look forward to ongoing collaboration with Deputy Registrars, legislators and stakeholders as we strive to deliver efficient and effective services to Minnesotans.

Sincerely,



John Harrington
Commissioner-Department of Public Safety