



**Department of  
Motor Vehicles**

# **ONLINE PRE-LICENSING COURSE PILOT POLICIES**

# New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

## Online Pre-Licensing Course Pilot Policies Document

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## Introduction

### Background

New York State (NYS) Vehicle & Traffic Law (VTL) was amended to require the Department of Motor Vehicles (the Department) to conduct a pilot program (Pilot) to assess the delivery of the Online Pre-Licensing Course, commonly referred to as the “5-hour classroom course,” via internet. To distinguish the current classroom-based program from the internet program, NYS has named this Pilot the Online Pre-Licensing Program or “OPL”, to specifically reference the internet as described in the enabling legislation. Sponsors that wish to participate in the OPL Pilot must meet requirements outlined in the VTL, Commissioner’s Regulations (including 15 NYCRR Part 10), and state policies, including those outlined in this document.

### Requirement Overview

The enabling legislation, Chapter 368 of the Laws of 2019, requires that the Department develop a pilot program that ensures:

- Student identity is validated at registration and throughout the course;
- Student participation is validated throughout the course;
- Students have met the time requirement outlined by the VTL; and
- Students successfully complete the course.

The legislation established the following general requirements:

- Sponsors that want to participate in the Pilot must apply to participate.
- Class DJ/MJ applicants shall not be eligible to participate in the OPL Pilot.
- Sponsors shall be required to meet information security guidelines.
- A study must be conducted to evaluate the use of the internet for the administration and the completion of an approved pre-licensing course.

Sponsors must clearly inform individuals prior to registration for an OPL course that no one who is an applicant for a junior license is permitted to register for an OPL course. Sponsors shall require individuals applying for registration in an OPL course to provide their date of birth as it appears on the individual’s permit. Sponsors shall not allow applicants for a junior license to register for any OPL course.

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Sponsors must clearly inform individuals of their successful completion of the course. Sponsors must clearly inform individuals that the course completion may take up to 24 to 48 hours to be posted on their driver record.

Approved OPL sponsors may subcontract with other vendors for certain technical services, subject to the Department's approval.

All sponsors must have legal authority to do business in New York State.

### Expectations of the Pilot

The course sponsors shall be required to provide data as it relates to the following:

1. Overall course satisfaction;
2. Perception that the course was interesting;
3. Perception that the course was easy to use; and
4. Perception that the course will positively influence their future driving performance.

Sponsors shall ask students questions related to the following to obtain the data mentioned above (see Data Dictionary below for specifics):

- Student satisfaction with method of delivery
- Factors for choosing online course (Select up to 3 choices)
- Student interest
- Usefulness of information
- Ease of use of course

The sponsors shall collect this data throughout the term of the Pilot and provide it to the Department at a minimum on a quarterly basis throughout the term of the Pilot or upon a request of the Department. This data shall be the basis for the Department's report to the Legislature and Governor at the conclusion of the Pilot.

### Sponsor Application Process

The two-step application process is designed to minimize development costs and potential delays during the review and approval process, while ensuring that the finished product adheres to the mandated requirements.

#### Step 1

Approved sponsors that desire to participate in the Pilot must:

- Complete all OPL application forms (Form number DTP-403, DTP-404, DTP-405).
- Provide all required supporting documentation.
- Include a one time, \$7,500 non-refundable application fee in the form of a certified check or money order, payable to the Commissioner of Motor Vehicles.
- Mail the application and fee to:

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- NYS Department of Motor Vehicles  
Driver Training Programs, Rm. 327  
6 Empire State Plaza Albany, NY 12228

The application will be reviewed by the Department to ensure completeness and adherence to the OPL requirements. It is anticipated that several follow-up discussions between the Department and appropriate sponsor staff will occur as a result of the application submitted. NYS reserves the right to return incomplete applications to sponsors for more information. Sponsors that have their application returned can resubmit their updated application at any time. The \$7,500 non-refundable application fee only needs to be paid upon submission of original applications.

### Step 2

The Department will review the application to ensure all requirements are met. Sponsors must:

- Present the course as a customer ready product with all validations and content that follow the requirements outlined in this document, 15 NYCRR Part 10 and any other requirements established by the Department.
- Provide the URL (web address) of the training, and 10 unique usernames and passwords that can be used by Department staff to review the curriculum.
- Submit the Security Assessment Questionnaire (Appendix B)
- Provide appropriate materials (software, phone numbers, content questions and answers, validation questions, etc.) necessary for testing the sponsor's proposed validation and participation methodologies by up to 10 different Department associates.
- Identify physical location(s) of the data server used to either deliver the course and/or store student participation data (detailed in data collection requirements section) and the responsible person (and their contact information) at this location. If the data server is located outside of New York State, the course sponsors are required to reimburse the state for the cost of travel to this site, and to any other site where related data may be stored, to verify security requirements are being met, even if the application is not approved.

Sponsors must obtain a bond, or letter of credit, in the amount of \$ 100,000, naming DMV as a beneficiary. Applicants need not provide the bond or letter of credit with their initial application materials, though this requirement must be satisfied before DMV will grant final approval to conduct an OPL course. Sponsors that do not provide the bond or letter of credit with application materials will be advised in writing by DMV when all other application requirements have been satisfied. The sponsor must then submit the bond or letter of credit in order to be for the bond or letter of credit to be reviewed by the Department. Payment on the bond or letter of credit to the Department shall not be subject to the approval of any other parties, nor shall payment on the bond or letter of credit to the Department require in-person presentation of documents outside of New York State.

If the bond or letter of credit is found to be acceptable to the Department, the sponsor will receive final approval to deliver the course. The Department will notify the sponsor when course delivery may commence. The sponsors must submit proof of bond renewal on an annual basis.

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Once all requirements have been met, the Department will notify sponsors in writing that they have been approved.

Applications will be reviewed in the order they are received. The length of time for review and approval will depend upon the quality and completeness of the application.

### Department Review & Approval Process

All applications will be logged-in based on when they were received, and they will be tracked during the various reviews completed (curriculum, security, background, etc.). As stated previously, these will be reviewed in a first in, first out order. Cooperation by the sponsor in answering questions, scheduling and hosting the security review, and providing follow up or supplemental materials requested (if necessary) will assist in getting the application processed as quickly as possible.

Communication about application and programmatic deficiencies will be reported by the Department to the sponsor's application contact person. If the sponsor would like this communication to go to multiple people, this must be noted on the application form. The Department will note all items found to be non-compliant upon completion of its review, in writing to the sponsor's contact person(s). Once a sponsor has successfully met all Pilot requirements described herein, the Department will provide written approval allowing the sponsor to start delivering the OPL course. The Department shall notify approved sponsors in writing of the date the sponsors can start delivering the OPL course.

### Customer Service Requirements

The Department requires that:

- The cost of all services is spelled out to the motorist at the point of sale (course cost, customer service fees, technology costs, etc. where applicable). There shall be no hidden fees and fees shall not change after the student registers for the course and accepts the terms and conditions required by the regulation.
- The course delivery and participation validation methods, and terms and conditions of course and course payment/refund policies shall be described to individuals prior to the sale.
- Individuals shall agree to the terms and conditions, subject to approval by the Department, by typing "I agree" prior to the course commencing. Terms and conditions for students shall lay out the following:
  - Course completion requirements;
  - Validation methods, clearly described in plain language;
  - Requirement that student must successfully complete content questions for each topic to qualify for completion;
  - Course sponsors will notify the Department and the student of course completion, including time frame;
  - Scheduling their road test is dependent on the Department receiving notification of successful course completion from the course sponsor; and
  - Acknowledge that the course sponsors privacy policy and schedule of fees have been made available to the student, and that the student agrees to both.

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- Sponsors shall provide live customer service telephone support, that is at a minimum, Monday through Saturday from 8 am to 4 pm EST. The Department will consider sponsor applications that utilize an interactive voice message system to supplement live contact or in conjunction with live contact. Sponsors are required to maintain documentation regarding frequently asked questions (FAQs) to assist members of the public during the hours when telephone support is unavailable. The sponsors may propose additional customer support methods for consideration by the department. The Department will revisit this requirement after the Pilot has been operational for 6 months.
- Sponsors shall make available to students a printable version of key learning points covered during the training so that they may have a ready reference if desired.

### Student Validation

The responsibility for validating student identity, as well as student participation, shall be with the sponsors. While the Department intends to monitor sponsor compliance through existing resources, and/or through a third-party contractor, the sponsor shall be accountable for their compliance.

The collection of the initial sample does not count as a validation point. It is capturing the sample to validate against.

In order to meet the legislative intent, and to assure that rigorous course requirements are met (including identity validation and student participation), while allowing multiple delivery methods to be employed, the Department has assigned “point” values to validation techniques. Those validation techniques and point values can be found in Table 1 – Student Validation Technique Option Available to Sponsors in Designing Program of Appendix E.

Sponsors seeking approval for their OPL courses must have a minimum of seven points, using two or more of these techniques, provided, however, that one point must be for content questions. The content questions may be asked at random points throughout the course or at the end of each chapter or unit. Such questions do not need to be in the form of a final exam. Sponsors are free to suggest alternate techniques, although the actual points assigned will be based on a determination by the Department. Depending upon the robustness of the solution offered by the Sponsor, the Department reserves the right to increase or decrease the point values above to reflect the quality of a particular Sponsor's solution in meeting or exceeding the validation requirements. Student private information, as defined in the personal identification section shall be encrypted. All authentication information shall be protected; for example, it should not be stored or transmitted in clear text.

Students must pass the identity validations before they can progress to the next section. Students must not be allowed to continue if they fail identity validations. Students who fail 3 consecutive identity validations must be prohibited from completing the course. Students who have been prohibited from completing the course may re-register for the course, but such student must start from the beginning of the course. Nothing shall prohibit the sponsor from allowing the student to re-register at no cost.

### Validation Requirements & Third-Party Databases

This section details requirements not otherwise detailed in the previous sections, and focuses primarily on requirements for student validation, and also data storage. Student validation will focus on

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Biometrics, Telephone Contact, Online Chat/Discussion Group, Personal and Content Questions, and Email/Text Requirements.

### Phone Contact

Phone contact, for the purpose of this identity validation method, does NOT include customer service phone support described earlier in this document. This phone contact is selected by the sponsor as an additional validation/participation method. This method can either be the sponsor contacting the student while the course is being delivered, or by prompting the student to contact the sponsor at a toll-free number.

Once the student contacts the sponsor, the student's identity is validated using personal questions. It is preferred that when phone contact is initiated by the student, when prompted, that a live operator be available to answer the phone within one minute. Recognizing that 24/7 service may not be practical, sponsors may elect to utilize an automated service outside of the core customer service hours.

Sponsors shall capture specific data for each phone contact, including student identity information, date/time of contact, operator guiding the call and answers to personal/content questions as part of student information. This information should be stored electronically and be available for the entire 5-year pilot period. Sponsors shall implement security measures to ensure that personal validation information cannot be retained by operators or by contracted services, such as outsourcers in other countries.

### Third Party Database Questions

This method refers to the sponsor's use of data elements from a third-party database. Data sets shall not be provided by the Department.

The Department reserves the right to review and approve the use of third-party database information for the purpose of validating student identity, including any contracts, agreements, security protocols and policies. The Department may consult the third-party data provider without permission from or knowledge of the course sponsor.

### Personal/Content Questions

Should sponsors opt to utilize phone contact, online personal or content questions, students will be required to answer authentication questions correctly and within the prescribed timeframes as indicated in Table 2 – Proposed Validation of Student Identity & Participation in Appendix E.

Personal questions may be asked throughout the course, and at a minimum, at the beginning of each session logon. Students are limited by the number of times they can incorrectly answer personal identity and content/environment questions. Questions will be asked as they relate to material presented in each section, and can either be after video clips or at the end of each sub-section or section. Students that fail to answer the minimum number of content/environment questions correctly can have additional questions asked (adding to the minimum time requirement) so as to proportionally be able to answer a correct number of questions in a subsequent attempt as appropriate. Students will have up to 3 complete opportunities (for a total of 10 personal or 20 content questions each) in order to “prove” participation.



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Students must pass the chapter content questions before they can progress to the next section. Students must not be allowed to continue if they fail participation validations. All information that sponsor places on their OPL course website must be viewed by the student before the student can progress to the next section. Student must be prohibited from completing the course after 3 consecutive failed attempts at attaining the minimum required percentage of questions correct as identified in the Appendices attached. Students who have been prohibited from completing the course may re-register for the course, but such student must start from the beginning of the course. Nothing shall prohibit the sponsor from allowing the student to re-register at no cost.

### E-mail Contact

Should sponsors opt to use email as a validation method, they will need to confirm that the email was “received”, by providing to the student both the hyperlink to “confirm” registration or to link to the course upon acceptance of payment. Email contact can also be used to transmit user sign-ons and passwords in order to access the course. The purpose of email contact is to send information necessary to access the course to a student-provided address. The preferred method is for the username and password to be transmitted in separate emails, but mailing both in a single email is acceptable if a password change is required upon initial log on to the sponsor site.

### Online Contact

In the event sponsors wish to use some form of online contact with students, the requirements of this option are:

- Students must identify themselves in a manner that will allow them to be linked to the student participation database.
- Online contact can utilize participatory tools available on the internet including but not limited to instant messaging, online whiteboards and collaboration software.
- During online contact, sponsors can ask personal/content questions or use this to provide online help.
- Sponsors must clearly demonstrate how they plan to implement and use this option, as well as how they plan to protect the information that is transmitted. Sponsors must not transmit private data using clear text; all private data must be encrypted and secured.

### Other Portable Devices (Smartphones/Tablet)

The features and functions of today's devices may support the delivery of a course. Sponsors that opt to deliver their courses using this methodology can couple the device with interactive use of the device to have students answer both personal and content questions during the course.

## Data Collection Requirements

### Online Course Participation Data

All sponsors are required to collect and report certain standardized data on each student for the duration of the Pilot. The data captured must be reported to the Department in an un-altered manner,

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based on how it was captured from the students. Data found to be altered shall result in sponsors being suspended or revoked. Data will be collected on the following:

- At the time a student signs up for the online pre-licensing course, the course sponsor is responsible for collecting the following required information from customers signing up for the course:
  - Student's name, as it appears on the permit
  - Student's nine-digit client identification number, as it appears on the NYS Learner Permit
  - Student's DOB, as it appears on the NYS Learner Permit
  - Class of permit held by the student, as it appears on the NYS Learner Permit
    - D
    - DJ
    - M
    - MJ
    - E
  - Expiration date, as it appears on the NYS Learner Permit
  - Student's document number (eight or ten-digit combination of numbers and letters), as it appears on the NYS Learner Permit
  - Course Enrollment Date/Time (i.e. start date)
    - MM/DD/YYYY
    - Time format – Time Stamp
  - Student's E-mail Address
- At the time a student completes an online pre-licensing course, the course sponsor is responsible for collecting the following required information for each course completion:
  - Course Completion Date/Time
    - MM/DD/YYYY
    - Time format – Time Stamp
  - Active Time to complete the course
  - Student Satisfaction with Method of Delivery
  - Date and Time of each Validation
  - Method of each Validation
  - Status/result of each Validation
    - Pass
    - Fail

All data listed under "OPL Student Participant Information" shall be required to be retained by the sponsor from the beginning of the Pilot to the end of the study, except where otherwise specified. The Department may add additional values or elements once sponsors submit applications for their unique course. The initial data dictionary of the required retained elements can be found in Table 3 – OPL Student Participant Information – Data Dictionary in Appendix E:

Pursuant to 15 NYCRR § 10.9, each sponsoring agency application must include a specific plan for how instruction time will be calculated. A record of such calculations, including all instruction time, will be recorded and stored by the sponsor and made available to the third-party monitor and the Department

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for monitoring and quality control purposes. This information, as part of each student's completion record, must clearly differentiate actual interactive instruction time from non-instruction time such as log-in procedures, administrative tasks, help functions, validation processes, and audio/visual media download times. Such record shall be maintained for five years from the date the record was created.

### Data Submission Overview

The Department will provide a service to submit data for the online pre-licensing course completion at the time that a motorist/student completes the course. This service will record in real-time the pre-licensing course completion for a single motorist. The individual submission per motorist will enable the student to schedule a road test directly after completing the pre-licensing course. The intent is for this service call to be imbedded within the sponsor's automated process which maintains the course completion data with in their records.

A technical document will be provided to each online pre-licensing course provider outlining the service input and output along with the technical details needed to consume the service. A preliminary outline of such document can be found in "Appendix C - Technical Interface Outline". Additional details will be provided when they become available.

If the call to the service is successful and the pre-licensing course completion is added to the student's license record, a response code will be returned indicating that no issues were encountered. The service will automatically collect a fee of \$8 from the sponsor's escrow account with the Department for each successful submission. If the call to the service was unsuccessful and the course completion was not able to be added to the student's license record, a list of error codes will be returned in the service response indicating why the pre-licensing course completion could not be recorded. The sponsor will be responsible for reviewing the errors, correcting any issues, and resubmitting the completion via the same provided service to add the pre-licensing course completion to the student's license record. The sponsor will not be charged for unsuccessful submissions.

In the event a student begins, but does not complete the course, sponsors will complete as much information as possible (for example, start date and start time). The Department strongly recommends that sponsors DO NOT collect social security numbers, as they are not needed to match to the license record. As part of Pilot participation, sponsors will be expected to transmit the required data either to the Department and/or another party designated by the Department to receive such data. Data transmission is to be achieved in a manner and frequency to be determined by the Department. A sponsor's ability to properly collect, store and report this data shall be validated during the sponsor OPL curriculum review and approval process. Sponsors shall be required to capture, store and report additional information such as student footprint data or survey results.

The complete data will be submitted to the Department or a third party approved by the Department. The elements of the data that need to be submitted shall conform to ALL of the elements listed under "OPL Student Participant Information". Sponsors must submit course completions to the Department in a manner consistent with the Appendix C - Technical Interface. The Department, in its sole discretion, shall determine whether a sponsor has adhered to Appendix C - Technical Interface. If at any point during the Pilot, the Department determines that the method of electronic submission of completion confirmations or payments to the Department outlined in Appendix C - Technical Interface is, or has

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become, unavailable and the Department determines that an alternate process is possible, the Department may allow sponsors to make submissions that it determines necessary by means of such alternate process until such time that the Department requires sponsors to return to the method outlined in Appendix C - Technical Interface.

Participation in testing of the internet pre-licensing course completion reporting webservice shall in no way indicate that an application to become an internet pre-licensing course sponsor has been, or is likely to be, approved. During testing the applicant shall adhere to the obligations found in the statutes, regulations, and policies (in particular, Article 12-D of the VTL, 15 NYCRR Part 10, and DTP-402), governing the internet pre-licensing course as those obligations relate to, both applicants and sponsors. DMV may terminate testing with the applicant at any time in DMV's sole discretion.

### Student Footprint Logs

To facilitate the Department's ability to audit the 270-minute time requirement, sponsors that offer computer-based training shall be required to collect and store logs of student activity as they progress through the training. Data stored for each student, during each session must include all fields specified in Table 4 – Student Footprint Logs Chart of Appendix E.

Sponsors will not be required to transmit this data but are expected to store it and make it available to the Department, upon request, as needed. The logs must be stored in the format above and must be human readable.

### User Interface Requirements

NYS desires OPL courses that engage the user in the learning experience. Courses that are reviewed which do not require the student to “participate” in some fashion will not be approved. The user's graphical interface must be user friendly, which is demonstrated through:

- Ease of use.
- Length of time it takes for pages to load.
- Ability to play multimedia during the course (assuming student has appropriate hardware and software installed).
- Ability to log on and off the course site and navigate easily and freely to material previously covered.
- Easily understood policies & procedures regarding course and usage during the enrollment process.
- Scrolling should be limited to up and down where appropriate, versus also requiring the user to scroll left to right.

The sponsors are encouraged to create a course that is viewable and legible on multiple platforms and devices. In an effort to encourage innovation and alternative methods, NYS will allow sponsors to choose which mandatory elements they will incorporate in their course delivery, within certain parameters, as defined below:

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### Audio/Visual Requirements

Students will have varying internet connection bandwidth rates, which must be taken into account in the overall ratio of multimedia to alternate content delivery (e.g., chart with text), where possible.

Timing requirements, as outlined in the table below, are based on successful completion of the minimum course duration of 270 minutes. The Department anticipates the course to be broken into 6-10 sections that can be completed at a reasonable pace. These sections would be logical groupings of material from the approved classroom curriculum. Minimum content will be determined based on Table 5 – Audio/Visual Requirements in Appendix E:

Recognizing that material on the internet can vary widely, and that the emphasis is on student learning, the Department will consider alternate time calculation methods, at its discretion, so long as sponsors can demonstrate that the course meets the 270-minute requirement.

Sponsors must meet all Data Security Requirements dictated in Appendix - D

### Questions?

These policies will be updated as needed. Written questions about these policies can be submitted as follows:

Driver Training Program - Room 327 6 Empire State Plaza Albany, NY 12228 Fax: (518) 473-0160

Email: [Dmv.sm.PCIPP@dmv.ny.gov](mailto:Dmv.sm.PCIPP@dmv.ny.gov)

Any changes to or clarifications of these policies will be shared with all approved sponsors and applicants with pending applications.

Version Tracking:

6/18/20 – Initial Draft

7/8/20 – Addition of Service Description (Appendix C)

8/7/20 – Edits to the Service Description (Appendix C)

10/1/20 – Edits to the Service Description (Appendix C); Addition of Testing Language, Addition of Student Participation Language; Addition of Identity Validation Language, Addition of Application Requirements

## APPENDIX A: PRIMARY SECURITY AND PRIVACY MANDATES

New York State considers the protection of sensitive and confidential information and business systems to be of the utmost importance. The information collected and maintained by state and local government agencies is protected by a myriad of Federal and State laws and regulations. Access to and use of sensitive and confidential information is limited to authorized government employees and legally designated agents, for authorized purposes only.

The following chart reflects several significant federal and state laws, rules and regulations, policies, standards and guidelines that providers doing business with the State must be aware of. Links to further guidance are included. The list is intentionally US-centric, and is not intended to be all-inclusive. Further, since laws, regulations, requirements and industry guidelines change, consulting definitive sources to assure a clear understanding of compliance requirements is critical. Many agencies have additional program compliance requirements that must be considered in addressing compliance. (e.g., DMV Privacy Act, Public Service Law, etc.). Details should be outlined in the Statement of Work prior to engagement of services.

### Significant federal and state laws, regulations, policies, standards, and guidelines

- Criminal Justice Information Services (CJIS) Security Policy
- Federal Educational Rights and Privacy Act (FERPA)
- Federal Information Security Management Act (FISMA)
  - National Institute of Technology Standards
- Gramm-Leach-Bliley Act (GLB) Act
- Health Insurance Portability and Accountability Act (HIPAA)
- Health Information Technology for Economic and Clinical Health Act (HITECH)
- IRS Publication 1075
- Payment Card Industry Data Security Standard (PCI DSS)
- Sarbanes-Oxley Act (SOX)
- Electronic Communications Privacy Act, Stored Communications Act and the PATRIOT Act
- New York State Breach Notification Act <http://www.dhSES.ny.gov/ocs/breach-notification/>
- NYS Cyber Security Policy and related Standards <http://www.its.ny.gov/eiso/policies/security>
- NYS Cyber Incident Reporting <http://www.its.ny.gov/incident-reporting>
- Federal Driver's Privacy Protection Act of 1994 (DPPA) (18 U.S.C. §2721, et seq.)
- SSA Technical System Security Requirements (TSSR)
- Federal Executive Order 13556 for Controlled Unclassified Information (CUI)
- Cloud Computing Security Requirements

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### Criminal Justice Information Services (CJIS) Security Policy

The CJIS Security Policy represents a shared responsibility between the Federal Bureau of Investigations (FBI) and CJIS System Agencies (CSA) and State Identification Bureau (SIB). For the state of New York, the NY State Police is the CSA, and the Department of criminal justice is the SIB. The policy covers the roles and responsibilities for the FBI and the CSA and service providers covered under a CJIS security addendums and CJSI management control agreements.

CJIS requirements guidance:

- <http://www.fbi.gov/about-us/cjis/cjis-security-policy-resource-center/view>

### Family Educational Rights and Privacy Act (FERPA) - State Ed, Higher Ed

Protects the privacy of student education records. “Education records” are “those records, files documents, and other materials which 1) contain information directly related to a student; and 2) are maintained by an educational institution. Examples: Grades, courses taken, schedule, test scores, advising records, educational services received, disciplinary actions, student identification number, Social Security number, student private email. FERPA applies to all schools that receive funds under an applicable program of the U.S. Department of Education.

FERPA requirements guidance:

- <http://www2.ed.gov/policy/gen/guid/fpco/ferpa/index.html>
- Electronic Code of Federal Regulations, Title 34, Part 99

### Federal Information Security Modernization Act (FISMA)

FISMA requires each federal agency to develop, document, and implement an effective agency-wide program to provide information security for the information and information systems that support the operations and assets of the agency, including those provided or managed by another agency, contractor, or other source. It is Title III of the E-Government Act of 2002. It affects Federal agencies, and other agencies they share data with.

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Key requirements/provisions include:

- Periodic risk assessments.
- Policies and procedures based on these assessments that cost-effectively reduce information security risk and ensure security is addressed throughout the life cycle of each information system.
- Subordinate plans for information security for networks, facilities, etc.
- Security awareness training for personnel.
- Periodic testing and evaluation of the effectiveness of information security policies, procedures, practices and controls, at least on an annual basis.
- A process to address deficiencies in information security policies.
- Procedures for detecting, reporting and responding to security incidents.
- Procedures and plans to ensure continuity of operations for information systems that support the organization's operations and assets.

FISMA requirements guidance:

- <http://csrc.nist.gov/drivers/documents/FISMA-final.pdf>
- <http://www.dhs.gov/federal-information-security-management-act-fisma>
- <http://csrc.nist.gov/groups/SMA/fisma/overview.html>
- <http://csrc.nist.gov/groups/SMA/fisma/>

FISMA requires that federal agencies comply Federal Information Processing Standards (FIPS) developed by the National Institute of Standards and Technology (NIST). Guidance documents and recommendations are issued in the NIST Special Publication (SP) 800-series. Office of Management and Budget (OMB) policy OMB Memorandum M-10-15, directs agencies to follow NIST guidance.

NIST Special Publications <http://csrc.nist.gov/publications/PubsSPs.html>

### Gramm-Leach-Bliley Act (GLB) Act of 1999

The GLB Act (also known as the Financial Modernization Act of 1999), includes provisions to protect consumers' personal financial information held by financial institutions. There are three principal parts to the privacy requirements: the Financial Privacy Rule, the Safeguards Rule and pretexting provisions.

GLB affects financial institutions (banks, securities firms, insurance companies), as well as companies providing financial products and services to consumers (including lending, brokering



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or servicing any type of consumer loan; transferring or safeguarding money; preparing individual tax returns; providing financial advice or credit counseling; providing residential real estate settlement services; collecting consumer debts).

Key requirements/provisions: The privacy requirements of GLB include three principal parts:

- The Financial Privacy Rule: Requires financial institutions to give customers privacy notices that explain its information collection and sharing practices. In turn, customers have the right to limit some sharing of their information. Financial institutions and other companies that receive personal financial information from a financial institution may be limited in their ability to use that information.
- The Safeguards Rule: Requires all financial institutions to design, implement and maintain safeguards to protect the confidentiality and integrity of personal consumer information.
- Pretexting provisions: Protect consumers from individuals and companies that obtain their personal financial information under false pretenses, including fraudulent statements and impersonation.

GLB requirements guidance: -<https://www.ftc.gov/tips-advice/business-center/privacy-and-security/gramm-leach-bliley-act>

### Health Information Portability Accountability Act (HIPAA)

HIPAA has two major arms: Privacy and Security. Privacy tends to be a business (non-IT) focus, involving the program, HIPAA Privacy Officer and legal. Security tends to be more IT-focused (though it does cover handling of paper records as well).

Many health agencies have compliance requirements that are more stringent than HIPAA - HIPAA is the baseline. For example, NYS Public Health law has tight requirements regarding AIDS information. The Federal 42 CFR Part 2 guides privacy requirements of substance abuse information. NYS Mental Hygiene law extends HIPAA consent requirements. Accordingly, meeting baseline HIPAA requirements may not be sufficient in all cases.

HHS (Federal Health and Human Services) HIPAA resources and requirements:

- Privacy rule: <https://www.hhs.gov/hipaa/for-professionals/privacy/index.html>
- Security rule: <https://www.hhs.gov/hipaa/for-professionals/security/index.html>

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Summarized versions:

- <https://www.hhs.gov/hipaa/for-professionals/security/laws-regulations/>

HHS Educational Series bulletins:

- <https://www.hhs.gov/hipaa/for-professionals/security/guidance/guidance-risk-analysis/index.html>
- <https://www.hhs.gov/sites/default/files/ocr/privacy/hipaa/administrative/securityrule/security101.pdf>  
highlights what is required and what is addressable.

AMA summary of violation (HHS Office of Civil Rights (OCR) audits can result in significant fines for not following the rules regardless of the scope of impact from a breach).

- <https://www.ama-assn.org/practice-management/hipaa-violations-enforcement>

### Health Information Technology for Economic and Clinical Health (HITECH) Act

The Health Information Technology for Economic and Clinical Health (HITECH) Act, enacted in 2009, promotes the adoption and meaningful use of health information technology. Subtitle D of the HITECH Act addresses the privacy and security concerns associated with the electronic transmission of health information, in part, through several provisions that strengthen the civil and criminal enforcement of the HIPAA rules.

HITECH requirements guidance:

- <http://www.hhs.gov/ocr/privacy/hipaa/administrative/enforcementrule/hitechforce.html>

IRS Safeguard Program, Publication 1075, Tax Information Security Guidelines for Federal, State and Local Agencies and Entities Pub1075 contains specific requirements for safeguarding federal tax information (current revision effective on Jan. 1, 2014).

- <https://www.irs.gov/uac/Safeguards-Program>
- <https://www.irs.gov/pub/irs-pdf/p1075.pdf>
- <https://www.irs.gov/uac/Additional-Requirements-for-Publication-1075>

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### Payment Card Industry Data Security Standard (PCI DSS)

The PCI DSS is a set of requirements for enhancing security of payment customer account data, developed by the founders of the PCI Security Standards Council, including American Express, Discover Financial Services, JCB International, MasterCard Worldwide and Visa to help facilitate global adoption of consistent data security measures. PCI DSS includes requirements for security management, policies, procedures, network architecture, software design and other critical protective measures. The Council also issued requirements called the Payment Application Data Security Standard (PA DSS) and PCI Pin Transaction Security (PCI PTS). PCI affects retailers, credit card companies, anyone handling credit card data. Currently, PCI DSS specifies 12 requirements, organized in six basic objectives:

#### Objective 1: Build and Maintain a Secure Retail Point of Sale System.

- Requirement 1: Install and maintain a firewall configuration to protect cardholder data
- Requirement 2: Do not use vendor-supplied defaults for system passwords and other security parameters

#### Objective 2: Protect Cardholder Data

- Requirement 3: Protect stored cardholder data
- Requirement 4: Encrypt transmission of cardholder data across open, public networks

#### Objective 3: Maintain a Vulnerability Management Program

- Requirement 5: Use and regularly update anti-virus software
- Requirement 6: Develop and maintain secure systems and applications

#### Objective 4: Implement Strong Access Control Measures

- Requirement 7: Restrict access to cardholder data by business need-to-know
- Requirement 8: Assign a unique ID to each person with computer access
- Requirement 9: Restrict physical access to cardholder data

#### Objective 5: Regularly Monitor and Test Networks

- Requirement 10: Track and monitor all access to network resources and cardholder data
- Requirement 11: Regularly test security systems and processes

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### Objective 6: Maintain an Information Security Policy

- Requirement 12: Maintain a policy that addresses information security

PCI compliance requirements:

- PCI DSS  
[https://www.pcisecuritystandards.org/security\\_standards/documents.php](https://www.pcisecuritystandards.org/security_standards/documents.php)
- PA DSS  
[https://www.pcisecuritystandards.org/security\\_standards/documents.php?agreements=pcidss&association=pcidss](https://www.pcisecuritystandards.org/security_standards/documents.php?agreements=pcidss&association=pcidss)
- PCI PTS  
[https://www.pcisecuritystandards.org/security\\_standards/documents.php](https://www.pcisecuritystandards.org/security_standards/documents.php)

### Sarbanes-Oxley Act of 2002 (SOX)

The Sarbanes-Oxley Act is designed to protect investors and the public by increasing the accuracy and reliability of corporate disclosures. It was enacted after the high-profile Enron and WorldCom financial scandals of the early 2000s. It is administered by the Securities and Exchange Commission, which publishes SOX rules and requirements defining audit requirements and the records businesses should store and for how long. It affects U.S. public company boards, management and public accounting firms.

The Act is organized into 11 titles:

1. Public Company Accounting Oversight
2. Auditor Independence
3. Corporate Responsibility
4. Enhanced Financial Disclosures
5. Analyst Conflicts of Interest
6. Commission Resources and Authority
7. Studies and Reports
8. Corporate and Criminal Fraud Accountability
9. White-Collar Crime Penalty Enhancements
10. Corporate Tax Returns
11. Corporate Fraud Accountability

SOX requirement guidance:

- <https://www.sec.gov/about/laws/soa2002.pdf>
- <http://www.soxlaw.com/>
- <https://www.gpo.gov/fdsys/pkg/PLAW-107publ204/content-detail.html>

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The U.S. Electronic Communications Privacy Act,

The U.S. Stored Communications Act

The U.S. PATRIOT Act

The Electronic Communications Privacy Act (ECPA) and the Stored Communications Act (SCA) create statutory privacy rights for people's electronic communications stored by a third-party service provider in "electronic," "computer," "temporary" or "intermediate" storage. Certain types of electronic communications (unread mail that is newer than 180 days) may only be obtained by law enforcement from a service provider via a search warrant. Other electronic communications and user information may be more easily obtained by law enforcement from a third-party provider by a court order or subpoena. Any communications may be obtained by law enforcement from a third-party provider if the end user has provided consent. End users should be careful not to give such consent by clicking through a Terms of Use and/or Privacy Policy or by signing a contract. The PATRIOT Act allows law enforcement to obtain or intercept electronic communications and other end user data from third-party service providers for terrorism investigations using protocols that are less stringent than those that would normally apply.

- U.S. Electronic Communications Privacy Act  
<https://it.ojp.gov/PrivacyLiberty/authorities/statutes/1285>
- U.S. Stored Communications Act  
<https://www.gpo.gov/fdsys/pkg/USCODE-2010-title18/html/USCODE-2010-title18-partI-chap121.htm>
- U.S. PATRIOT Act  
<https://www.fincen.gov/resources/statutes-regulations/usa-patriot-act>

Federal Driver's Privacy Protection Act of 1994 (DPPA) (18 U.S.C. §2721, et seq.)

Statute prohibits the disclosure of personal information as defined in 18 U.S.C. §2721 without express consent of the person to whom such information applies with the exception of certain circumstances set forth in 18 U.S.C §2721. These rules apply to Departments of Motor Vehicles as well as other authorized recipients of personal information, and imposes record-keeping requirements on those authorized recipients.

SSA Technical System Security Requirements (TSSR)

Social Security Administration (SSA) requires electronic data exchange partners to meet information security safeguards requirements, which are intended to protect SSA provided information from unauthorized access and improper disclosure. The Electronic Information Exchange Security Requirements and Procedures are provided to State and Local Agencies exchanging electronic Information with the SSA. The State and Local Electronic Information Exchange Partners (EIEPs) are provided with a detailed description of the management,

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operational and technical controls SSA requires of electronic data exchange partners to safeguard its information. The foundation for the requirements are the [Federal Information Security Management Act \(FISMA\)](#), Public Law (P.L.) 107-347, the Privacy Act of 1974 and SSA's own policies, procedures and directives. The SSA Technical System Security Requirements (TSSR) section 5.11 outlines the contractor oversight and compliance obligations for compliance with the SSA security requirements.

### Federal Executive Order 13556 for Controlled Unclassified Information (CUI)

[Executive Order 13556 "Controlled Unclassified Information"](#) and [32 CFR Part 2002](#) established the Federal CUI program, which provides standardized data controls for data originated by, or collected on behalf, of the Federal Government. Controlled Unclassified Information (CUI) is information that requires safeguarding or dissemination controls pursuant to and consistent with applicable law, regulations, and government-wide policies but is not classified under Executive Order 13526 or the Atomic Energy Act, as amended. Executive branch departments and agencies will review all categories, subcategories, and markings used to designate unclassified information for safeguarding and dissemination controls and submit proposed categories, subcategories, and markings to the Executive Agent (EA) for review and approval. The EA will consult with affected agencies and non-governmental stakeholders to develop and issue such directives as are necessary to implement the Order.

The requirements in the subpart applying to contracts and subcontracts requires contractors and subcontractors to safeguard Controlled Unclassified Information (CUI) that the agency identifies in the contract. This includes when CUI resides on or transmits through covered contractor information systems or within contractor facilities by applying specific network security and other security requirements. Contractors and subcontractors shall safeguard CUI that the agency identifies in the contract at all times in a manner that minimizes the risk of unauthorized disclosure while allowing timely access by authorized holders, and as otherwise required in 32 CFR Part 2002.14.

Contractors shall permit access to CUI that the agency identifies in the contract only:

- (1) When in furtherance of a lawful Government purpose that the contracting agency determines and identifies in the contract;
- (2) In accordance with the requirements of the laws, regulations, and Government-wide policies that authorized the CUI category or subcategory and which the agency identifies in the contract;
- (3) In accordance with authorized limited dissemination controls the contracting agency applies and identifies in the contract; and
- (4) When not otherwise prohibited by law.

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Agencies shall mark, in accordance with 32 CFR Part 2002.20, all CUI that the agency identifies in the contract, provides to the contractor, and requires the contractor to safeguard as part of the contract.

### Cloud Computing Requirements

The use of cloud computing services in the performance of a contract requires that the Contractor obtain approval from the Contracting Officer prior to utilizing cloud computing services in performance of any contract. [Federal Risk and Authorization Management Program \(FedRAMP\)](#) Moderate compliance is desired. If the solution is not FedRAMP Moderate compliant, an attestation must be provided detailing how the solution adheres to the control set or has equivalent mitigating controls. Regardless there are minimal security controls that must be adhered to, and will be assessed prior to approval of any cloud or vendor hosted computing alternatives to a State hosted solution. Terms and Hardware and/or Software may be proposed in combination with Cloud Services. The cloud computing assessment process minimally requires submission of a Consensus Assessments Initiative Questionnaire (CAIQ) provided by the [Cloud Security Alliance \(CSA\)](#). Completing the CAIQ is considered only a first-level screening process, with more intensive provider review processes required based on the overall solution. Cloud services must be hosted in the Contiguous United States (CONUS).

All Data must remain in CONUS. Any Data stored, or acted upon, must be located solely in Data Centers in CONUS. Services which directly or indirectly access Data may only be performed from locations within the CONUS. All Data in transit must remain in CONUS and be encrypted.

All helpdesk, online, and support services which access any Data must be performed from within CONUS. At no time will any Follow the Sun support be allowed to access Data directly, or indirectly, from outside CONUS.

Infrastructure Support Services that do not directly or indirectly access Data may be provided in a follow the sun form, if expressly outlined with the authorized user agreement.

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**APPENDIX B: SECURITY ASSESSMENT QUESTIONNAIRE**

Security Assessment Questionnaire

- Vendor Response: NA Not Applicable  
 Yes Provide detail  
 No If no, What are your compensating controls?

Requirement	Request	Vendor Response
-------------	---------	-----------------

1. Cloud Requirements	Is all data and backups staying in The Continental United States (CONUS)?	
-----------------------	---------------------------------------------------------------------------	--

	Is your cloud solution FEDRAMP certified?	
--	-------------------------------------------	--

2. Payment Card Industry Requirement	Please provide a copy of your Payment Card Industry Attestation of Compliance for your solution.	
--------------------------------------	--------------------------------------------------------------------------------------------------	--

3. Security: NYS-S14-003 Information Security Controls Standard (control list applies to Personal, Private, Sensitive Information)	Control	In place?
	Access approval/removal process in place	
	Business Continuity/Disaster Recovery Plan	
	Approved electronic storage media and devices	
	Approved storage facility	
	Chain of custody for physical media	
	Destroy data when no longer needed?	
	Formal change control procedures for information systems	
	Formal test plans and documented results for information systems	
	Information classification and inventory	
	Privacy disclaimer on e-mail and fax cover sheets	
	Review system and application security logs	
	Review access lists (annually)	
	Backup recovery procedures	
	Basic input data validation	
	Data plausibility and field comparison edits	
	Encryption for Transmission/Transportation/ Storage (TTS)	
	Encryption/hashing of electronic authentication information	
	Environmental protection measures	
	Environmental protection measures monitoring	
Erase re-writeable media prior to reuse		
Limit access to secure areas		
Use message integrity		
Perform regular backup		



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Requirement	Request	Vendor Response
	Test recovery of backup data	
	Use disposal method for re-writeable media	
	Confirmation of identity and access rights of requester	
	No confidential information in e-mail subject line	
	Secure physical media when unattended	
4. Security: NYS-S14-013 Account Management / Access Control Standard	Please explain the rules and processes for creating, maintaining and controlling the access to employee and customer’s accounts.	
5. Security: NYS-S14-010 Remote Access	How are you going to implement remote access?	
6. Security: NYS-S13-002 Secure Coding Standard	Please confirm secure coding requirements.	
	What scanning tool is being used?	
	What is your code scanning schedule?	
7. Security: NYS-S15-001 Patch Management Standard	Who is responsible for patch management?	
	What is the patching process?	
	Are there separation of duties?	
	Do you maintain a list of all assets that must be patched?	
	What is your patching timeline?	
8. Security: NYS-S15-002 Vulnerability Scanning Standard	What type of scan do you run?	
	What is the frequency of the scan?	

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Requirement	Request	Vendor Response
	What scanning tool are you using?	
9. Security: NYS-S14-005 Security Logging Standard	State require logs to be protected as high confidentiality and integrity data. What controls do you have in place to protect the log data?	
10. Security: NYS-S14-008 Secure Configuration Standard	Do you have a configuration management plans?	
	Do you have configuration monitoring process?	
11. Security: NYS-S15-003 802.11 Wireless Network Security	If WIFI is used as a method to access your production system, how does it meet the policy?	
12. Security: NYS-S14-006 Authentication Tokens	What are your password management and composition requirements?	
	How many failed login attempts do you allow before the account is locked?	
	How are account credentials delivered to a first-time user? (Email, phone, etc.)	
	How are users verified when they call for locked account issue?	
13. Security: NYS-S13-003 Sanitization/Secure Disposal Standard	Who is handling the destruction of hardware for the cloud?	
	If needed, how will the customer's data be removed from your database?	
	What tool will be used?	
14. Security: NYS-S14-007	Data in Transmission: Must be TLS 1.2 or later.	

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Requirement	Request	Vendor Response
Encryption Standard		
	Data at rest/storage: Data encrypt must at least be AES 128 or greater.	
15. Security: NYS-P03-002 Information Security Policy	Please be familiar with this policy.	
16. Security: NYS-P10-006 Identity Assurance Policy	How are you verifying the customer's identity when they are signing up?	
	What data are you asking for them to submit?	
17. Security: NYS-S14-009 Mobile Device Security	For mobile devices that will access or contain DMV data, what method of full disk encryption are you implementing on the device?	
	Is DMV data removed or rendered inaccessible after no more than 10 incorrect authentication attempts?	
	Do devices automatically lock after being idle for a period not to exceed 10 minutes?	
	Are devices managed by a Mobile Device Management (MDM) or other centralized management solution?	

## APPENDIX C: WEBSERVICE DESCRIPTION

### Revision History

REV NO	DATE	REVISION DETAILS	AUTHOR
0.1	06/10/2020	Completed Initial Draft.	Steven Busch
0.2	06/30/2020	Included Development region URL and WSDL information, security requirements.	Steven Busch
0.3	08/03/2020	Updated with example	Steven Busch
0.4	08/31/2020	WSDL and example updated	Terri LaMarche
0.5	09/29/2020	Included Error message list	Terri LaMarche

### APPENDIX C.1 – Service Info

#### Service Names (Development Service URL)

<https://api-dev.ny.gov/PreLicensingCompletion1.0?wsdl>

#### Version

1.0

#### Business Unit

DMV Driver Training Programs

#### Service Credentials

Please contact the DMV Driver Training Programs Business Unit to be assigned credentials (username and password pair).

#### Authentication

Requestor will be authenticated via WS-Security Username Token (username and password pair).

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### Non-Repudiation

To prevent replay attacks, a Timestamp token is required.

### Transport-Layer Security

All requests are to be transmitted over HTTPS using the TSL 1.2. Transport layer will encrypt and sign the payload to ensure message security and integrity.

### Contact

For any questions, please contact the DMV Driver Training Programs Business Unit.

Email: [Dmv.sm.PCIPP@dmv.ny.gov](mailto:Dmv.sm.PCIPP@dmv.ny.gov)

## APPENDIX C.2 – Schemas

### Record Course Completion

This operation is used to record that a Pre-Licensing course has been completed successfully by a client.

### Request

Element Name	Description	Data Type	Required/Optional	Length
ConsumerId	Consumer ID	String (alphanumeric)	Required	
MachineName	Machine Name	String (alphanumeric)	Optional	
UserId	User ID	String (alphanumeric)	Required	
IpAddress	IP Address	String (alphanumeric)	Optional	Max 15

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	<b>Client Information</b>	<b>Object - START</b>		
ClientId	Client ID	String (numeric)	Required	9
ClientLastName	Client Last Name	String (alphanumeric)	Required	39
ClientFirstName	Client First Name	String (alphanumeric)	Required	39
ClientMiddleName	Client Middle Name	String (alphanumeric)	Optional	39
ClientSuffix	Client Suffix	String (alphanumeric)	Optional	5
ClientDOB	Client Date of Birth	DateTime	Required	10
ClientEmail	Client Email Address	String (alphanumeric)	Optional	265
	<b>Client Information</b>	<b>Object - END</b>		
	<b>Document Information</b>	<b>Object - START</b>		
DocumentClass	Document Class	String (alphanumeric)	Required	3
DocumentNumber	Document Number on Permit	String (alphanumeric)	Required	10
DocumentExpirationDte	Document Expiration Date	DateTime	Required	
	<b>Document Information</b>	<b>Object - END</b>		
	<b>Course Information</b>	<b>Object - START</b>		
ClassEnrollmentDte	Class Enrollment Date	DateTime		

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ClassCompletionDte	Class Completion Date	DateTime	Required	
ClassActiveTime	Class Active Time	Int	Required	
ProviderBusinessId	Provider Business Identification number (Supplied by DTP)	Int	Required	
CourseId	Course ID (Supplied by DTP)	String (alphanumeric)	Required	5
LanguageCde	Language Code (Supplied by DTP)	String (alphanumeric)	Required	3
	<b>Course Verifications</b>	<b>Object (Repeats) - START</b>		
VerificationLogDateTime	Verification Log Datetime	DateTime	Required	
VerificationLogMethod	Verification Log Method	String (alphanumeric)	Required	25
VerificationResultCde	Verification Result Code	String (alphanumeric)	Required	4
	<b>Course Verifications</b>	<b>Object (Repeats) - END</b>		
	<b>Course Information</b>	<b>Object - END</b>		
	<b>Survey Information</b>	<b>Object - START</b>		
DeliverySatisfactionRating	Delivery Satisfaction	String (alphanumeric)	Required	3

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	Rating (Expect 1-5)			
ParticipantInterestRating	Participant Interest Rating (Expect 1-5)	String (alphanumeric)	Required	3
InformationUsefulnessRating	Information Usefulness Rating (Expect 1-5)	String (alphanumeric)	Required	3
EaseOfUseRating	Ease of Use Rating (Expect 1-5)	String (alphanumeric)	Required	3
ConvenienceOfLocationChoice	Convenience of Location Choice	Boolean	Required	
ConvenienceOfTimeChoice	Convenience of Time Choice	Boolean	Required	
CostChoice	Cost Choice	Boolean	Required	
AvailabilityChoice	Availability Choice	Boolean	Required	
OtherChoice	Other Choice	Boolean	Required	
OtherChoiceReason	Other Choice Reason	String (alphanumeric)	Optional	60
	<b>Survey Information</b>	<b>Object - END</b>		

Response

<b>Element Name</b>	<b>Description</b>	<b>Required/Optional</b>	<b>Data Type</b>
<a href="#">SystemResponse</a>	System Response	Optional	Object



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### Structure Definitions

#### SystemResponse

Element Name	Description	Required/ Optional	Data Type	Length
Message	Parent Node		Repeats	N/A
Category	Response Category  P – Success (Enum = 0),  E – Error (Enum = -1),  I = Informational Only (Enum = 2),  N – No-hit (Enum 1)	Optional	String	Max 1
Code	Response Code	Optional	String (alphanumeric)	Max 8
Detail	Response Detail	Optional	String (alphanumeric)	Max 80
Function	Response Function Area	Optional	String (alphanumeric)	N/A
Environment	Response Environment	Optional	String	N/A

## APPENDIX C.3 – Implementation

### WSDL Definition



PreLicensingCompl  
etion1.xml

```
<?xml version="1.0" encoding="UTF-8"?>

<wsdl:definitions targetNamespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/"
xmlns:wsa="http://schemas.xmlsoap.org/ws/2004/08/addressing"
xmlns:wsws="http://www.w3.org/2006/05/addressing/wsdl"
xmlns:wsa10="http://www.w3.org/2005/08/addressing"
xmlns:wsmex="http://schemas.xmlsoap.org/ws/2004/09/mex"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:ns0="http://schemas.microsoft.com/Message"
xmlns:soap12="http://schemas.xmlsoap.org/wsdl/soap12/"
xmlns:ns2="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/"
xmlns:ns1="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/Imports"
xmlns:soapenc="http://schemas.xmlsoap.org/soap/encoding/"
xmlns:wsdl="http://schemas.xmlsoap.org/wsdl/"
xmlns:wsp="http://schemas.xmlsoap.org/ws/2004/09/policy"
xmlns:tns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/" xmlns:wsu="http://docs.oasis-
open.org/wss/2004/01/oasis-200401-wss-wssecurity-utility-1.0.xsd"
xmlns:msc="http://schemas.microsoft.com/ws/2005/12/wsdl/contract"
xmlns:wsap="http://schemas.xmlsoap.org/ws/2004/08/addressing/policy"
xmlns:wsx="http://schemas.xmlsoap.org/ws/2004/09/mex"
xmlns:soap="http://schemas.xmlsoap.org/wsdl/soap/"
xmlns:wsam="http://www.w3.org/2007/05/addressing/metadata">

  <wsdl:types>

    <xs:schema targetNamespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/"
xmlns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/"
xmlns:b="http://schemas.microsoft.com/BizTalk/2003"
xmlns:q1="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/"
xmlns:xs="http://www.w3.org/2001/XMLSchema"><xs:import
namespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/"/><xs:annotat
ion><xs:appinfo><b:references><b:reference
targetNamespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/"/>

      </b:references>

    </xs:appinfo>
```

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```
</xs:annotation><xs:element
name="RecordCourseCompletionResponse"><xs:complexType><xs:sequence><xs:element
ref="q1:SystemResponse"/>
</xs:sequence>
</xs:complexType>
</xs:element>
</xs:schema>
<xs:schema targetNamespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/Imports"
xmlns:tns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/Imports"
xmlns:xs="http://www.w3.org/2001/XMLSchema"><xs:import
namespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/"><xs:import
namespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/">
</xs:schema>
<xs:schema elementFormDefault="qualified"
targetNamespace="http://schemas.microsoft.com/Message"
xmlns:tns="http://schemas.microsoft.com/Message"
xmlns:xs="http://www.w3.org/2001/XMLSchema"><xs:complexType
name="MessageBody"><xs:sequence><xs:any maxOccurs="unbounded" minOccurs="0"
namespace="##any"/>
</xs:sequence>
</xs:complexType>
</xs:schema>
<xs:schema targetNamespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/"
xmlns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/"
xmlns:b="http://schemas.microsoft.com/BizTalk/2003"
xmlns:xs="http://www.w3.org/2001/XMLSchema"><xs:element
name="RecordCourseCompletionRequest"><xs:complexType><xs:sequence><xs:element
name="ConsumerId" type="xs:string"/><xs:element name="MachineName"
type="xs:string"/><xs:element name="UserId" type="xs:string"/><xs:element name="IpAddress"
type="xs:string"/><xs:element name="ClientInformation"><xs:complexType><xs:sequence><xs:element
name="ClientId" type="xs:string"/><xs:element name="ClientLastName" type="xs:string"/><xs:element
name="ClientFirstName" type="xs:string"/><xs:element name="ClientMiddleName"
type="xs:string"/><xs:element name="ClientSuffix" type="xs:string"/><xs:element name="ClientDOB"
type="xs:dateTime"/><xs:element name="ClientEmail" type="xs:string"/>
</xs:sequence>
</xs:complexType>
```

## New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

```
</xs:element><xs:element
name="VerifiedDocumentInformation"><xs:complexType><xs:sequence><xs:element
name="DocumentClass" type="xs:string"/><xs:element name="DocumentNumber"
type="xs:string"/><xs:element name="DocumentExpirationDte" type="xs:dateTime"/>

</xs:sequence>

</xs:complexType>

</xs:element><xs:element
name="CourseInformation"><xs:complexType><xs:sequence><xs:element name="ClassEnrollmentDte"
type="xs:dateTime"/><xs:element name="ClassCompletionDte" type="xs:dateTime"/><xs:element
name="ClassActiveTime" type="xs:int"/><xs:element name="ProviderBusinessId"
type="xs:int"/><xs:element name="CourseId" type="xs:string"/><xs:element name="LanguageCde"
type="xs:string"/><xs:element maxOccurs="unbounded" minOccurs="0"
name="CourseVerification"><xs:complexType><xs:sequence><xs:element
name="VerificationLogDateTime" type="xs:dateTime"/><xs:element name="VerificationLogMethod"
type="xs:string"/><xs:element name="VerificationResultCde" type="xs:string"/>

</xs:sequence>

</xs:complexType>

</xs:element>

</xs:sequence>

</xs:complexType>

</xs:element><xs:element
name="SurveyInformation"><xs:complexType><xs:sequence><xs:element
name="DeliverySatisfactionRating" type="xs:string"/><xs:element name="ParticipantInterestRating"
type="xs:string"/><xs:element name="InformationUsefulnessRating" type="xs:string"/><xs:element
name="EaseOfUseRating" type="xs:string"/><xs:element name="ConvenienceOfLocationChoice"
type="xs:boolean"/><xs:element name="ConvenienceOfTimeChoice" type="xs:boolean"/><xs:element
name="CostChoice" type="xs:boolean"/><xs:element name="AvailabilityChoice"
type="xs:boolean"/><xs:element name="OtherChoice" type="xs:boolean"/><xs:element
name="OtherChoiceReason" type="xs:string"/>

</xs:sequence>

</xs:complexType>

</xs:element>

</xs:sequence>

</xs:complexType>

</xs:element>
```

## New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

```
</xs:schema>

<xs:schema
targetNamespace="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/"
xmlns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/"
xmlns:b="http://schemas.microsoft.com/BizTalk/2003"
xmlns:xs="http://www.w3.org/2001/XMLSchema"><xs:element
name="SystemResponse"><xs:complexType><xs:sequence><xs:element maxOccurs="unbounded"
minOccurs="0" name="Message"><xs:complexType><xs:sequence><xs:element
name="Category"><xs:annotation><xs:appinfo><b:fieldInfo notes="Response Category: P – Success
(Enum = 0), E – Error (Enum = -1), I = Informational Only (Enum = 2), N – No-hit (Enum 1)"/>

</xs:appinfo>

</xs:annotation><xs:simpleType><xs:restriction
base="xs:string"><xs:enumeration value="P"/><xs:enumeration value="E"/><xs:enumeration
value="I"/><xs:enumeration value="N"/>

</xs:restriction>

</xs:simpleType>

</xs:element><xs:element maxOccurs="1" minOccurs="0"
name="Code"><xs:annotation><xs:appinfo><b:fieldInfo notes="Response Code"/>

</xs:appinfo>

</xs:annotation><xs:simpleType><xs:restriction base="xs:string"><xs:maxLength
value="8"/>

</xs:restriction>

</xs:simpleType>

</xs:element><xs:element maxOccurs="1" minOccurs="0"
name="Detail"><xs:annotation><xs:appinfo><b:fieldInfo notes="Response Detail"/>

</xs:appinfo>

</xs:annotation><xs:simpleType><xs:restriction base="xs:string"><xs:maxLength
value="80"/>

</xs:restriction>

</xs:simpleType>

</xs:element><xs:element maxOccurs="1" minOccurs="0"
name="Function"><xs:annotation><xs:appinfo><b:fieldInfo notes="Response Function Area"/>

</xs:appinfo>

</xs:annotation><xs:simpleType><xs:restriction base="xs:string"/>
```

## New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

```
        </xs:simpleType>
      </xs:element>
    </xs:sequence>
  </xs:complexType>
</xs:element><xs:element maxOccurs="1" minOccurs="0"
name="Environment"><xs:annotation><xs:appinfo><b:fieldInfo notes="Reponse Environment"/>
  </xs:appinfo>
  </xs:annotation><xs:simpleType><xs:restriction base="xs:string"/>
  </xs:simpleType>
</xs:element>
</xs:sequence>
</xs:complexType>
</xs:element>
</xs:schema>
</wsdl:types>
<wsdl:message name="PreLicensingExt_RService_RecordCourseCompletion_OutputMessage">
  <wsdl:part name="part" element="tns:RecordCourseCompletionResponse">
  </wsdl:part>
</wsdl:message>
<wsdl:message name="PreLicensingExt_RService_RecordCourseCompletion_InputMessage">
  <wsdl:part name="part" element="tns:RecordCourseCompletionRequest">
  </wsdl:part>
</wsdl:message>
<wsdl:portType name="PreLicensingCompletion1.0_3">
<wsdl:documentation/>
  <wsdl:operation name="RecordCourseCompletion">
<wsdl:documentation/>
  <wsdl:input message="tns:PreLicensingExt_RService_RecordCourseCompletion_InputMessage">
  </wsdl:input>
```

## New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

```
<wsdl:output message="tns:PreLicensingExt_RService_RecordCourseCompletion_OutputMessage">
</wsdl:output>
</wsdl:operation>
</wsdl:portType>
<wsdl:binding name="PreLicensingCompletion1.0_2" type="tns:PreLicensingCompletion1.0_3">
  <soap:binding transport="http://schemas.xmlsoap.org/soap/http"/>
  <wsp:PolicyReference URI="#Policy2"/>
  <wsp:PolicyReference URI="#Policy3"/>
  <wsdl:operation name="RecordCourseCompletion">
<wsdl:documentation/>
  <soap:operation soapAction="RecordCourseCompletion" style="document"/>
  <wsdl:input>
    <soap:body use="literal"/>
  </wsdl:input>
  <wsdl:output>
    <soap:body use="literal"/>
  </wsdl:output>
</wsdl:operation>
</wsdl:binding>
<wsdl:service name="PreLicensingCompletion1.0_1_vs0">
  <wsdl:port name="PreLicensingCompletion1.0_portINT" binding="tns:PreLicensingCompletion1.0_2">
    <soap:address location="https://api-dev.ny.gov:443/PreLicensingCompletion1.0"/>
  </wsdl:port>
  <wsdl:port name="PreLicensingCompletion1.0_EXT" binding="tns:PreLicensingCompletion1.0_2">
    <soap:address location="https://api-dev.ny.gov:443/PreLicensingCompletion1.0"/>
  </wsdl:port>
</wsdl:service>
  <wsp:Policy Name="urn:uuid:96468af8-bf49-11e3-a73b-bc0604d47e06" visibility="public"
wsu:Id="Policy2"><sp:TransportBinding
```

## New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

```
xmlns:sp="http://schemas.xmlsoap.org/ws/2005/07/securitypolicy"><wsp:Policy
visibility="public"><sp:AlgorithmSuite><wsp:Policy
visibility="public"><sp:Basic256/></wsp:Policy></sp:AlgorithmSuite><sp:Layout><wsp:Policy
visibility="public"><sp:Lax/></wsp:Policy></sp:Layout><sp:TransportToken><wsp:Policy
visibility="public"><sp:HttpsToken><wsp:Policy
visibility="public"/></sp:HttpsToken></wsp:Policy></sp:TransportToken></wsp:Policy></sp:TransportBi
nding></wsp:Policy>
```

```
<wsp:Policy Name="urn:uuid:a0a2b5fd-6630-11e6-ac01-b7029dbc6056" visibility="public"
wsu:Id="Policy3" xmlns:http="http://schemas.xmlsoap.org/wsdl/http/"
xmlns:ns="http://www.w3.org/ns/ws-policy"
xmlns:ns0="http://schemas.xmlsoap.org/ws/2004/09/policy"
xmlns:rna_v1_3="urn:metadata.ws.rightnow.com/v1_3"
xmlns:rnb_v1_3="urn:base.ws.rightnow.com/v1_3" xmlns:rnf_v1_3="urn:faults.ws.rightnow.com/v1_3"
xmlns:rng_v1_3="urn:generic.ws.rightnow.com/v1_3"
xmlns:rnm_v1_3="urn:messages.ws.rightnow.com/v1_3"
xmlns:rnn_v1_3="urn:nullfields.ws.rightnow.com/v1_3"
xmlns:rno_v1_3="urn:objects.ws.rightnow.com/v1_3"
xmlns:rnw_v1_3="urn:wSDL.ws.rightnow.com/v1_3"><sp:SupportingTokens
xmlns:sp="http://schemas.xmlsoap.org/ws/2005/07/securitypolicy"><wsp:Policy
visibility="public"><sp:UsernameToken
SubjectCategory="urn:org:federatedgovernance:security:subject-category:consumer"
sp:IncludeToken="http://schemas.xmlsoap.org/ws/2005/07/securitypolicy/IncludeToken/AlwaysToReci
ipient"><wsp:Policy
visibility="public"><sp:WssUsernameToken10/></wsp:Policy></sp:UsernameToken></wsp:Policy></sp:
SupportingTokens></wsp:Policy>
</wsdl:definitions>
```

Sample Request/Response

### Request:

```
<soapenv:Envelope
xmlns:ns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/"
xmlns:soapenv="http://schemas.xmlsoap.org/soap/envelope/">
  <soapenv:Header>
    <wsse:Security soapenv:mustUnderstand="1"
xmlns:wsse="http://docs.oasis-open.org/wss/2004/01/oasis-200401-wss-
wssecurity-secext-1.0.xsd" xmlns:wsu="http://docs.oasis-
open.org/wss/2004/01/oasis-200401-wss-wssecurity-utility-1.0.xsd">
```



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```
<wsse:UsernameToken wsu:Id="UsernameToken-
ECD2B152A60C99D24115988851844703">
    <wsse:Username>username</wsse:Username>
    <wsse:Password Type="http://docs.oasis-
open.org/wss/2004/01/oasis-200401-wss-username-token-profile-
1.0#PasswordText">password</wsse:Password>
</wsse:UsernameToken>
</wsse:Security>
</soapenv:Header>
<soapenv:Body>
    <ns:RecordCourseCompletionRequest>
        <ConsumerId>NP</ConsumerId>
        <MachineName>ESPAPPVM28</MachineName>
        <UserId>npentela</UserId>
        <IpAddress/>
        <ClientInformation>
            <ClientId>140687919</ClientId>
            <ClientLastName>MOTORIST</ClientLastName>
            <ClientFirstName>LUIS</ClientFirstName>
            <ClientMiddleName>M</ClientMiddleName>
            <ClientSuffix>Jr</ClientSuffix>
            <ClientDOB>1988-10-23T00:00:00</ClientDOB>
            <ClientEmail>CLIENT@email.com</ClientEmail>
        </ClientInformation>
        <VerifiedDocumentInformation>
            <DocumentClass>M</DocumentClass>
            <DocumentNumber>SIIUN4JE06</DocumentNumber>
            <DocumentExpirationDte>2022-03-
21T00:00:00</DocumentExpirationDte>
        </VerifiedDocumentInformation>
        <CourseInformation>
```

## New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

```
<ClassEnrollmentDte>2020-08-27T00:00:00</ClassEnrollmentDte>
<ClassCompletionDte>2020-08-31T00:00:00</ClassCompletionDte>
<ClassActiveTime>1</ClassActiveTime>
<ProviderBusinessId>3</ProviderBusinessId>
<CourseId>10002</CourseId>
<LanguageCde>ENG</LanguageCde>
<!--Zero or more repetitions:-->
<CourseVerification>
  <VerificationLogDateTime>2020-08-28T00:00:00</VerificationLogDateTime>
  <VerificationLogMethod>14=Online/Instant messenger tools</VerificationLogMethod>
  <VerificationResultCde>Pass</VerificationResultCde>
</CourseVerification>
<CourseVerification>
  <VerificationLogDateTime>2020-08-28T00:13:22.154135</VerificationLogDateTime>
  <VerificationLogMethod>15=Personal questions</VerificationLogMethod>
  <VerificationResultCde>fail</VerificationResultCde>
</CourseVerification>
</CourseInformation>
<SurveyInformation>
  <DeliverySatisfactionRating>1</DeliverySatisfactionRating>
  <ParticipantInterestRating>2</ParticipantInterestRating>
  <InformationUsefulnessRating>3</InformationUsefulnessRating>
  <EaseOfUseRating>4</EaseOfUseRating>
  <ConvenienceOfLocationChoice>true</ConvenienceOfLocationChoice>
</SurveyInformation>
```

## New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies

```
        <ConvenienceOfTimeChoice>true</ConvenienceOfTimeChoice>
        <CostChoice>false</CostChoice>
        <AvailabilityChoice>true</AvailabilityChoice>
        <OtherChoice>false</OtherChoice>
        <OtherChoiceReason/>
    </SurveyInformation>
</ns:RecordCourseCompletionRequest>
</soapenv:Body>
</soapenv:Envelope>
```

Response:

```
<s:Envelope xmlns:s="http://schemas.xmlsoap.org/soap/envelope/">
  <s:Body>
    <RecordCourseCompletionResponse
xmlns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/2020/3/"
xmlns:xsd="http://www.w3.org/2001/XMLSchema"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
      <SystemResponse
xmlns="http://schemas.its.ny.gov/DMV.PreLicensingExt.R/systemresponse/2020/3/">
        <Message xmlns="">
          <Category>P</Category>
          <Code>RPLC0000</Code>
          <Detail>Process Success</Detail>
          <Function>BuildUpdateCourseCompletionRequest</Function>
        </Message>
        <Environment xmlns="">DEV</Environment>
      </SystemResponse>
    </RecordCourseCompletionResponse>
  </s:Body>
</s:Envelope>
```

**New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies**

APPENDIX C.4 – Complete list of possible Error Messages

<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
P	RPLC0000	Process Success	Transaction processed successfully	None
E	RPLC0001	STATIC RESPONSE FOR RecordCourseCompletion	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0002	UNHANDLED EXCEPTION OCCURRED DURING - BuildStaticResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0003	REQUIRED CONSUMER ID IS MISSING	CONSUMER ID IS MISSING	Correct information and resubmit
E	RPLC0004	REQUIRED COMPLETION SOURCE CODE IS MISSING	COMPLETION SOURCE CODE IS MISSING	Correct information and resubmit
E	RPLC0005	INVALID REQUEST	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0006	UNHANDLED EXCEPTION OCCURRED DURING - ValidateRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0007	UNHANDLED EXCEPTION OCCURRED DURING - ProcessInsertCourseCompletionRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0008	Insert Course Completion had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0009	Insert Course Completion DAL Response is null	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0010	Invalid Return Code from Insert Course Completion DAL	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0011	Insert Course Completion had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0012	REQUIRED CLIENT ID IS MISSING	Client Section or corresponding field in client section is missing	Submit with fully populated client section
E	RPLC0013	CLIENT ID SHOULD BE NUMERIC	Client Section or corresponding field in client section is missing	Submit with fully populated client section

**New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies**

<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0014	CLIENT ID SHOULD BE NINE DIGITS	Client Section or corresponding field in client section is missing	Submit with fully populated client section
E	RPLC0015	REQUIRED CLIENT LAST NAME IS MISSING	Client Section or corresponding field in client section is missing	Submit with fully populated client section
E	RPLC0016	REQUIRED CLIENT FIRST NAME IS MISSING	Client Section or corresponding field in client section is missing	Submit with fully populated client section
E	RPLC0017	REQUIRED CLIENT DOB IS MISSING	Client Section or corresponding field in client section is missing	Submit with fully populated client section
E	RPLC0018	CLIENT DOB SHOULD NOT BE A FUTURE DATE	CLIENT DOB SHOULD NOT BE A FUTURE DATE	Update/correct input data values indicated in error message and resubmit
E	RPLC0019	CLIENT AGE SHOULD NOT BE LESS THAN 18 YEARS	CLIENT AGE SHOULD NOT BE LESS THAN 18 YEARS	Update/correct input data values indicated in error message and resubmit
E	RPLC0020	REQUIRED DOCUMENT CLASS IS MISSING	Document Section or corresponding field in document section is missing	Submit with fully populated document section
E	RPLC0021	INVALID DOCUMENT CLASS	Document Section or corresponding field in document section is missing	Submit with fully populated document section
E	RPLC0022	REQUIRED DOCUMENT NUMBER IS MISSING	Document Section or corresponding field in document section is missing	Submit with fully populated document section
E	RPLC0023	REQUIRED DOCUMENT EXPIRATION DATE IS MISSING	Document Section or corresponding field in document section is missing	Submit with fully populated document section
E	RPLC0024	DOCUMENT EXPIRATION DATE SHOULD NOT BE A PAST DATE	Document Section or corresponding field in document section is missing	Submit with fully populated document section
E	RPLC0025	REQUIRED CLASS ENROLLMENT DATE IS MISSING	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section

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<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0026	CLASS ENROLLMENT DATE SHOULD NOT BE A FUTURE DATE	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section
E	RPLC0027	REQUIRED CLASS COMPLETION DATE IS MISSING	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section
E	RPLC0028	CLASS COMPLETION DATE SHOULD NOT BE A FUTURE DATE	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section
E	RPLC0029	CLASS ENROLLMENT DATE SHOULD NOT BE GREATER THAN CLASS COMPLETION DATE	CLASS ENROLLMENT DATE SHOULD NOT BE GREATER THAN CLASS COMPLETION DATE	Update/correct input data values indicated in error message and resubmit
E	RPLC0030	CLASS COMPLETION DATE SHOULD NOT BE MORE THAN 30 DAYS OF CLASS ENROLLMENT DATE	CLASS COMPLETION DATE SHOULD NOT BE MORE THAN 30 DAYS OF CLASS ENROLLMENT DATE	Update/correct input data values indicated in error message and resubmit
E	RPLC0031	REQUIRED CLASS ACTIVE TIME IS MISSING	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section
E	RPLC0032	REQUIRED PROVIDER ID IS MISSING	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section
E	RPLC0033	PROVIDER ID SHOULD BE NUMERIC	PROVIDER ID SHOULD BE NUMERIC	Update/correct input data values indicated in error message and resubmit
E	RPLC0034	REQUIRED COURSE ID IS MISSING	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section
E	RPLC0035	REQUIRED LAUNGUAGE CODE IS MISSING	Course Information Section or corresponding field in course information section is missing	Submit with fully populated course information section
E	RPLC0036	REQUIRED COURSE VERIFICATION LIST IS MISSING	Course Verification Section or corresponding field in course verification section is missing	Submit with fully populated course verification section
E	RPLC0037	ONE VERIFICATION IS REQUIRED	Course Verification Section or corresponding field in course verification section is missing	Submit with fully populated course verification section

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<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0038	REQUIRED COURSE VERIFICATION LOG DATETIME IS MISSING	Course Verification Section or corresponding field in course verification section is missing	Submit with fully populated course verification section
E	RPLC0039	COURSE VERIFICATION LOG DATETIME SHOULD NOT BE FUTURE DATE	COURSE VERIFICATION LOG DATETIME SHOULD NOT BE FUTURE DATE	Update/correct input data values indicated in error message and resubmit
E	RPLC0040	COURSE VERIFICATION DATETIME MUST BE WITH IN CLASS ENROLLMENT AND COMPLETION DATE	COURSE VERIFICATION DATETIME MUST BE WITH IN CLASS ENROLLMENT AND COMPLETION DATE	Update/correct input data values indicated in error message and resubmit
E	RPLC0041	REQUIRED COURSE VERIFICATION LOG METHOD IS MISSING	Course Verification Section or corresponding field in course verification section is missing	Submit with fully populated course verification section
E	RPLC0042	REQUIRED COURSE VERIFICATION RESULT CODE IS MISSING	Course Verification Section or corresponding field in course verification section is missing	Submit with fully populated course verification section
E	RPLC0043	REQUIRED DELIVERY SATISFACTION RATING IS MISSING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0044	INVALID DELIVERY SATISFACTION RATING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0045	REQUIRED PARTICIPANT INTEREST RATING IS MISSING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0046	INVALID PARTICIPANT INTEREST RATING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0047	REQUIRED INFORMATION USEFULNESS RATING IS MISSING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0048	INVALID INFORMATION USEFULNESS RATING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0049	REQUIRED EASE OF USE RATING IS MISSING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section

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<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0050	INVALID EASE OF USE RATING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0051	REQUIRED OTHER CHOICE REASON IS MISSING	Survey Information Section or corresponding field in survey information section is missing	Submit with fully populated survey information section
E	RPLC0052	UNHANDLED EXCEPTION OCCURRED DURING - ValidateRequiredRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0053	Required Request Validation had a Failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0054	UNHANDLED EXCEPTION OCCURRED DURING - ProcessGetProviderRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0055	Get Provider Info had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0056	NO DATA FOUND FOR GET PROVIDER INFO	DMV Data error	Contact DMV regarding Course Date
E	RPLC0057	GetProvider DAL Response is null	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0058	Invalid Return Code from GetProvider DAL	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0059	Get Provider had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0060	Provider Course Effective Dte cannot be null	DMV Data error	Contact DMV regarding Course Effective Date
E	RPLC0061	Provider Course Effective Dte cannot be greater than current date	DMV Data error	Contact DMV regarding Course Date
E	RPLC0062	Provider Course End Dte cannot be less than current date	DMV Data error	Contact DMV regarding Course Date
E	RPLC0063	Provider Business Escrow Acct cannot be null	DMV Data error	Contact DMV regarding Escrow account '



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<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0064	UNHANDLED EXCEPTION OCCURRED DURING - EvaluateVerifyProviderResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0065	Verify provider had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0066	UNHANDLED EXCEPTION OCCURRED DURING - ProcessGetCustomerRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0067	Get Customer Info had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0068	NO DATA FOUND FOR GET CUSTOMER INFO	Client Section or corresponding field in client section is missing	Submit with fully populated client section
E	RPLC0069	getCustomerDAL Response is Null	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0070	Invalid Return Code from getCustomer DAL	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0071	Get Customer had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0072	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0073	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0074	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0075	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit

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<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0076	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0077	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0078	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0079	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0080	Submission failed DMV verification of Identify Information provided	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0081	UNHANDLED EXCEPTION OCCURRED DURING - EvaluateVerifyCustomerResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0082	Verify customer had a failure, no errors in the MessageList	Verify correct client information	Update/correct input data values indicated in error message and resubmit
E	RPLC0084	_MVHostGwyTPRouter_GetProviderEscrowAmountResponse is null from EvaluateGetProviderEscrowAmountResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0085	_MVHostGwyTPRouter_GetProviderEscrowAmountResponse. Response is null from EvaluateGetProviderEscrowAmountResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0086	_MVHostGwyTPRouter_GetProviderEscrowAmountResponse. Response.Message is null from EvaluateGetProviderEscrowAmountResponse	An error occurred	Resubmit transaction if issue persists contact DMV

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<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0087	GetProviderEscrowAmount had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0088	Invalid Return Code from EvaluateGetProviderEscrowAmountResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0089	GetProviderEscrowAmount had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0090	Available funds are not sufficient	Escrow Account error	Contact DMV regarding Account funds
E	RPLC0091	Insufficient Funds Response had a failure, no errors in the MessageList	Escrow Account error	Contact DMV regarding Account funds
E	RPLC0093	_MVHostGwyTPRouter_DebitEscrowAccountResponse is null from EvaluateDebitEscrowAccountResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0094	_MVHostGwyTPRouter_DebitEscrowAccountResponse.Response is null from EvaluateDebitEscrowAccountResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0095	_MVHostGwyTPRouter_DebitEscrowAccountResponse.Response.Message is null from EvaluateDebitEscrowAccountResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0096	DebitEscrowAccount had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0097	Invalid Return Code from EvaluateDebitEscrowAccountResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0098	DebitEscrowAccount had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0099	EXCEPTION OCCURRED	An error occurred	Resubmit transaction if issue persists contact DMV

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<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0100	Insert New Course Completion Info had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0101	Invalid Return Code from InsertNewCourseCompletionResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0102	UNHANDLED EXCEPTION OCCURRED DURING - Insert Course Completion Process	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0103	_MVHostGwyTPRouter_CancelDebitProviderAccountResponse is null from EvaluateCancelDebitProviderEscrowResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0104	_MVHostGwyTPRouter_CancelDebitProviderAccountResponse.Response is null from EvaluateCancelDebitProviderEscrowResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0105	_MVHostGwyTPRouter_CancelDebitProviderAccountResponse.Response.Message is null from EvaluateCancelDebitProviderEscrowResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0106	CancelDebitEscrowAccount had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0107	Invalid Return Code from CancelDebitProviderEscrowResponse	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0108	EXCEPTION OCCURRED - Sending email process had a failure	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0109	Send email process had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0110	Insert Course Completion had a failure, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV

**New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies**

<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0111	EXCEPTION OCCURRED	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0112	UNHANDLED EXCEPTION OCCURRED DURING - BuildUpdateCourseCompletion Request	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0113	UNHANDLED EXCEPTION OCCURRED DURING - Get Provider Info	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0114	UNHANDLED EXCEPTION OCCURRED DURING - Get Customer Info	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0115	UNHANDLED EXCEPTION OCCURRED DURING - Get Provider Escrow Amount	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0116	UNHANDLED EXCEPTION OCCURRED DURING - Check for Available Funds	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0118	UNHANDLED EXCEPTION OCCURRED DURING - Debit Escrow Amount	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0119	UNHANDLED EXCEPTION OCCURRED DURING - Insert New Course Completion	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0131	UNHANDLED EXCEPTION OCCURRED DURING - ProcessUpdateCourseCompletion	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0141	Update Course Completion Process Failed, no errors in the MessageList	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0180	mismatching in Document Expiration Dte	mismatching in Document Expiration Dte	Update/correct input data values indicated in error message and resubmit
E	RPLC0200	UNHANDLED EXCEPTION OCCURRED DURING - BuildInsertCourseCompletion Request	An error occurred	Resubmit transaction if issue persists contact DMV

**New York State Department of Motor Vehicles - Online Pre-Licensing Course Pilot Policies**

<b>Category</b>	<b>Code</b>	<b>Detail</b>	<b>Meaning</b>	<b>Action Required to Resolve</b>
E	RPLC0201	UNHANDLED EXCEPTION OCCURRED DURING - BuildGetProviderRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0202	UNHANDLED EXCEPTION OCCURRED DURING - BuildGetCustomerRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0203	UNHANDLED EXCEPTION OCCURRED DURING - BuildGetProviderEscrowAmountRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0204	UNHANDLED EXCEPTION OCCURRED DURING - BuildCancelDebitProviderEscrowRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0205	UNHANDLED EXCEPTION OCCURRED DURING - BuildDebitEscrowAccountRequest	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0221	UNHANDLED EXCEPTION OCCURRED DURING - Cancel Debit Escrow Amount	An error occurred	Resubmit transaction if issue persists contact DMV
E	RPLC0222	UNHANDLED EXCEPTION OCCURRED DURING - BuildClientNotUpdatedEmailBodyRequest	An error occurred	Resubmit transaction if issue persists contact DMV

## APPENDIX D: DATA SECURITY REQUIREMENTS

### General Requirements

The data security of the administration of the Pilot in NYS is guided by a variety of laws, rules, regulations and policies at both the Federal and State level, as they may be amended from time to time. In any instance where the below referenced standards are inconsistent, the more stringent standard will preempt the lesser standard.

**Definitions**-Except for terms defined in 15 NYCRR Part 10, here, or in New York State Information Technology Services (ITS) policies, all terms may be found in the ITS Glossary <http://www.its.ny.gov/glossary>

Each course sponsor's solution must pass an internal security risk assessment conducted by NYS prior to implementation and after any significant system modifications. This review will determine whether adequate controls are in place to protect the availability of the System and the integrity and confidentiality of the information. The "System" shall be defined as an interconnected set of information resources under the same direct management control that shares common functionality. A system normally includes hardware, software, applications, and communications per <http://www.its.ny.gov/glossary>. For the purpose of these policies, a "significant" system modification is considered any change to what is included in the proposed system architecture.

The proposed design methodology, toolset, and project plan are subject to NYS ITS review and approval at the beginning of the Pilot, at the completion of each major phase, and at the end of the Pilot.

The course sponsor and its personnel, agents, officers and subcontractors shall review and be familiar with all State security policies, procedures and directives currently existing or implemented during the term of the Pilot, including the current NYS-PO3-002 Information Security Policy (or successor policy/policies). course sponsor and its personnel, agents, officers and subcontractors shall comply fully with all other security policies, standards, and procedures of the State not identified in these policies, but that are nevertheless clearly communicated to it in the performance of this Pilot. Course sponsor shall ensure that its personnel, agents, officers and subcontractors, if any, are fully aware of the obligations arising under these policies and shall take all commercially reasonable steps to ensure their compliance to prevent unauthorized use, access or disclosure of Confidential Information. The Department may also require that every member of the course sponsor staff assigned to provide work under these policies execute a nondisclosure agreement.

The Department shall have the right at any time to require that the course sponsor remove from interaction with the State or NYS Facilities any course sponsor representative who the Department, or another State Agency, in its sole discretion, believes is detrimental to its working relationship with the course sponsor. The Department will provide the course sponsor with notice of the Department or another State Agency's determination, and the reasons it requires removal. Such representative shall be removed by the date stated in the notice from the Department. If the Department or another State Agency signifies that a potential security violation exists with respect to the removal, the course sponsor shall immediately remove such individual. Course sponsor shall not assign the person to any aspect of the Pilot without the State's consent.

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Except as otherwise required by law, course sponsor shall not disclose State Data to a third party. Except where expressly prohibited by law, course sponsor shall promptly notify the State of any subpoena, warrant, judicial, administrative, or arbitral order of an executive or administrative agency or other governmental authority of competent jurisdiction (a "Demand") that it receives, and which relates to or requires production of the information or data course sponsor is processing or storing on the State's behalf. If course sponsor is required to produce Confidential Information or State Data in response to a Demand, course sponsor will provide the State with the Confidential Information or State Data in its possession that it plans to produce in response to the Demand prior to production. Except as otherwise required by law, course sponsor shall provide the State reasonable time to assert its rights with respect to the withholding of such Confidential Information or State Data from production. If the Department or another State Agency is required to produce Confidential Information or State Data in response to a Demand, course sponsor will, at the Department's request and unless expressly prohibited by law, produce to the State any Confidential Information or State Data in its possession that may be responsive to the Demand and shall provide assistance as is reasonably required for the Department to respond to the Demand in a timely manner. The Department acknowledges that course sponsor has no responsibility to interact directly with the entity making the Demand. The parties agree that the Department establishing these policies does not constitute consent to the release or production of State Data or Confidential Information.

As used in this section, the terms "State Data" and "Confidential Information" shall mean all State information (oral, visual, written, recorded, or saved in any medium or format) of which course sponsor, its personnel, agents, officers and subcontractors become aware of during the course of performing services for the State.

The course sponsor is responsible for abiding by the data security requirements stated below throughout the course of the Pilot:

- The course sponsor shall treat all data as being considered highly confidential and is classified as Personal Private Sensitive Information (PPSI), unless otherwise defined in these policies.
- All data must remain in the Contiguous United States (CONUS). Any data stored, or acted upon, must be located solely in data Centers in CONUS. Services which directly or indirectly access data may only be performed from locations within the CONUS. All data in transit must remain in CONUS and be encrypted. All data in transit must be handled in accordance with TLS1.2 (or any successor standard).
- If requested by the Department or otherwise required, the course sponsor will provide verification of compliance with specific Federal, State and local regulations, laws and policies and standards that the Department or another State Agency is required to comply with. See Appendix-A - Primary Security and Privacy Mandates.
- New York State considers the protection of Sensitive and Confidential Information and the protection of business systems to be of the utmost importance. The information collected and maintained by State and Local government agencies is protected by a myriad of Federal and State laws and regulations. Access to and use of Sensitive and Confidential Information is limited to authorized government employees and legally designated agents, for authorized purposes only.
- The chart in Appendix-A - Primary Security and Privacy Mandates reflects several significant Federal and State laws, rules and regulations, policies, standards and guidelines that course



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sponsors, its personnel, agents, officers and subcontractors must be aware of and comply with (if applicable) to the services being provided. Links to further guidance are included in the Appendix. The list is intentionally US-centric and does not constitute an exhaustive list. Further, since laws, regulations, requirements and industry guidelines change, consulting definitive sources by course sponsors to assure a clear understanding of compliance requirements is critical.

- The course sponsor must submit a diagram and detailed description of its proposed system architecture to the Department with a copy provided to other parties as identified by the Department.
- The course sponsor's solution must comply with the most recent versions of the following applicable NYS ITS policies and standards:
  - NYS-P10-006 Identity Assurance Policy
  - NYS-S13-002 Secure Coding Standard
  - NYS-S13-003 Sanitization/Secure Disposal Standard
  - NYS-S14-003 Information Security Controls Standard
  - NYS-S14-005 Security Logging Standard
  - NYS-S14-006 Authentication Tokens Standard
  - NYS-S14-007 Encryption Standard
  - NYS-S14-008 Secure Configuration Standard
  - NYS-S14-009 Mobile Device Security Standard
  - NYS-S14-010 Remote Access Standard
  - NYS-S14-013 Account Management / Access Control Standard
  - NYS-S15-001 Patch Management Standard
  - NYS-S15-002 Vulnerability Scanning Standard
  - NYS-S15-003 802.11 Wireless Network Security Standard
- The course sponsor must complete the Security Assessment Questionnaire and submit it to the Department and any other party designated by the Department (See Appendix B).
- The course sponsor may be required by the Department to perform a third-party security risk assessment. In the event that such an assessment is required, the course sponsor shall provide a certified copy of the Security Risk Assessment to the Department within 30 days of completion (assuming the Department exercises the option to require the course sponsor to conduct such an assessment).
- The course sponsor, its personnel, agents, officers and subcontractors, if any, must comply with all applicable federal, state, and local laws, regulations, policies, standards, and guidelines including but not limited to those outlined in Appendix-A - Primary Security and Privacy Mandates.
- The course sponsor shall require in writing its personnel, officers, agents or subcontractors to similarly abide by any such requirements including the execution of any documents certifying their compliance with such requirements.
- The course sponsor must develop an Information Security Plan. The Information Security Plan must minimally include:
  - A risk assessment and remediation;
  - A detailed description of how the course sponsor's solution will comply with applicable information security/privacy/confidentiality policies;
  - A detailed description of how the course sponsor's compliance will be planned, executed, and maintained; and

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- An application access control matrix, which identifies the components or items within the System that each user or entity has access to (i.e., which actors have access to which objects).
- The course sponsor must work with NYS to perform a security risk assessment of the proposed security architecture to ensure that the proposed security architecture is acceptable to NYS.
- The course sponsor's solution must pass an internal NYS security risk assessment conducted by NYS prior to implementation and after any significant system modification. The security review shall be comprised of, but not limited to, the following:
  - A review by NYS of course sponsor's documentation;
  - Vulnerability, web application, and penetration scans to be performed by NYS, as NYS deems necessary; and
  - Remediation by the course sponsor of all issues to ensure that its solution is compliant with all NYS policies and standards as determined by NYS.
- The course sponsor must remediate all risks identified by the security risk assessment or obtain the Department's approval for compensating controls. The final outcome and the Department's approval of the security risk assessment must be documented by providing a Security Risk Assessment Remediation Plan.
- The course sponsor must describe in detail the security features of the proposed solution, including how the solution will:
  - protect against unauthorized information disclosure
  - protect against unauthorized, unintentional, or incorrect modification of software or data
  - ensure availability of systems and information
  - establish confidence in the identity of users or information systems
  - establish access rights to resources
  - build a historical record of user actions and of critical system processes
  - ensure use of the System maintains the confidentiality and integrity of any information exchanged
  - ensure unintended and unreliable system behavior is securely handled to protect against confidentiality, integrity and availability threats
  - ensure configurable parameters needed for software or a system to run are protected in accordance with the industry standard
  - assign only the minimum allowable rights to a user, that requests access to a resource, for the shortest duration necessary
  - ensure multiple conditions are met before granting permissions to an object
  - layer security defenses in an application to reduce the chance of a successful attack
  - ensure confidentiality and integrity of the System remains intact even though system availability has been lost due to a system failure
  - require access checks to an object each time a user requests access, especially for security-critical objects
  - use real protection mechanisms to secure sensitive information; do not rely on an obscure design or implementation to protect information (otherwise known as "security through obscurity")
  - avoid having multiple users share mechanisms to grant access
  - ensure that security functionality is easy to use and transparent to the user
  - reuse proven and validated code and standard libraries rather than creating custom code
  - identify and protect a system's weakest components
  - eliminate any single source of complete compromise

### **Personal Identification Information**

Information that is considered personal information includes, but is not limited to, student name, address, date of birth, motorist identification number, client identification number, social security number (if collected), credit card information, answers to personal and content questions and biometric samples. Computer systems storing this information shall be protected against data theft and loss. Financial transactions shall be conducted securely, so that theft of personal identification information is unlikely. In the event this information becomes compromised, sponsors are required to investigate the incident and determine what data has been compromised. Suspected or confirmed inappropriate access to or disclosure of personal identification data collected for OPL shall be reported to the Department's Director of Audit Services or designees and the Department's Director of Driver Training Programs by phone within 1 hour of detection. This notification shall be followed up in writing by fax or e-mail within 24 hours of detection. The sponsor shall fully investigate the compromise and report the circumstances as well as the steps taken or proposed to be taken to prevent similar instances in the future. Failure by the sponsor to notify the Department of disclosure of student personal information, as specified, will result in sponsor suspension or revocation. Notification must be made to the following individuals:

- DTP - Director, Driver Training Programs (518) 473-7174
- Field Audit - Director or designee (518) 474-0881

If personal identification information has been compromised, the sponsor must provide assistance and information regarding identity theft, how the student can monitor their credit report and what resources exist for preventing and/or identifying and reporting any potential identity theft.

**APPENDIX E: TABLES**

**Table 1 - Student Validation Technique Options Available to Sponsors in Designing Program**

Method of Validation	Examples/Parameters of Validation Method	Points Assigned
Facial Recognition	Biometric—Hardware provided by sponsor and included in cost of course	6
Fingerprint	Biometric—Hardware provided by sponsor and included in cost of course	6
Handprint	Biometric—Hardware provided by sponsor and included in cost of course	6
Retina or Iris Scan	Biometric—Hardware provided by sponsor and included in cost of course	6
Ear Scan	Biometric—Hardware provided by sponsor and included in cost of course	6
Keystroke Analysis	Biometric—Software provided by sponsor and included in cost of course	5
Voice Print	Biometric—Software provided by sponsor and included in cost of course	6
Other Biometric	Prior Department approval required	To be determined
Phone Contact	Prompting student to dial a toll-free number to answer content or identity questions.	2
Third Party Database	Using individualized questions based on data stored in a credit bureau or government database (this is unrelated to and separate from a 3rd party monitoring organization)	2

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Online/Instant Message	Prompting student to answer questions through an online chat discussion group or when online technical assistance requested.	1
Personal Questions	Questions aimed at authenticating identity.	1
Content Questions	Questions aimed at determining student participation.	1
E-mail/Text	Sending technical assistance response or usernames and password for site access. If both username and password are transmitted in the same email/text, password must be changed when the student first logs on.	1
Other Techniques	Prior Department approval required	To be determined

Table 2 - Proposed Validation of Student Identity & Participation

Type of Question	Number In Test Bank	Minimum # in Course	Correct Responses Required (70%)	Amount of Time to Read & Answer - PC Format	Amount of Time to Ask & Answer - Phone Contact
Personal identity	30	10	7	45 seconds	30 seconds
Content/environment	100	20	14	60 seconds	45 seconds

Table 3 - “OPL Student Participant Information” —Data Dictionary

Data/Column Name	Data Type - Length - Value	Description
Sponsor Code	Char (4)	Sponsor Code on License File

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Motorist Last Name	Char (25)	Last Name of motorist as appears on the NYS learner’s permit
Motorist First Name	Char (25)	First Name of motorist as appears on the NYS learner’s permit
Motorist Middle Initial	Char (1)	Middle Initial as appears on NYS learner’s permit
Motorist Client ID	Char (9)	ID From NYS learner’s permit
Motorist Date of Birth	Char (10) (mm/dd/yyyy)	Check DOB w/CID to ensure accurate posting of completion information..
Start Date	Char (10) (mm/dd/yyyy)	Date Motorist Started Course
Start Time	Char (6) (hhmm AM/PM)	Start Time of OPL Course
End Date	Char (10) (mm/dd/yyyy)	Date Motorist Ended Course
End Time	Char (6) (hhmm AM/PM)	End Time of OPL Course
Total Time	Num (4)	Total Time in Minutes Start to End
Number of Sessions	Num (2)	Total number of user sessions from start time to end time
Date Reported to the Department	Char (10) (mm/dd/yyyy)	Date the completion data was reported to the Department by the sponsor
Completed Course	Logical (1)	Y=Yes, N=No
Method of Validation 1	Char (2)	Initial Acceptable Values:
		01=Biometric—face recognition
		02=Biometric—key stroke
		03=Biometric—fingerprint

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		04=Biometric—voice print
		12=Third Party Database questions
		13=Phone contact
		14=Online/Instant messenger tools
		15=Personal questions
		16=Content questions
		18=Email
Method of Validation 2	Char (2)	Initial Acceptable Values:
		01=Biometric—face recognition
		02=Biometric—key stroke
		03=Biometric—fingerprint
		04=Biometric—voice print
		12=Third Party Database questions
		13=Phone contact
		14=Online/Instant messenger tools
		15=Personal questions
		16=Content questions
		18=Email
Method of Validation 3	Char (2)	Initial Acceptable Values:
		01=Biometric—face recognition
		02=Biometric—key stroke

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		03=Biometric—fingerprint
		04=Biometric—voice print
		12=Third Party Database questions
		13=Phone contact
		14=Online/Instant messenger tools
		15=Personal questions
		16=Content questions
		18=Email
Valid Question 1*	Char (3)	Unique sponsor question code
Student Answer 1	Char (1)	Student Answer to unique question
Valid Question 2	Char (3)	Unique sponsor question code approved by the Department
Student Answer 2	Char (1)	Student Answer to unique question
Valid Question 3	Char (3)	Unique sponsor question code approved by the Department
Student Answer 3	Char (1)	Student Answer to unique question
Valid Question 4	Char (3)	Unique sponsor question code approved by the Department
Student Answer 4	Char (1)	Student Answer to unique question
Valid Question 5	Char (3)	Unique sponsor question code approved by the Department
Student Answer 5	Char (1)	Student Answer to unique question



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Valid Question 6	Char (3)	Unique sponsor question code approved by the Department
Student Answer 6	Char (1)	Student Answer to unique question
Valid Question 7	Char (3)	Unique sponsor question code approved by the Department
Student Answer 7	Char (1)	Student Answer to unique question
Valid Question 8	Char (3)	Unique sponsor question code approved by the Department
Student Answer 8	Char (1)	Student Answer to unique question
Valid Question 9	Char (3)	Unique sponsor question code approved by the Department
Student Answer 9	Char (1)	Student Answer to unique question
Valid Question 10	Char (3)	Unique sponsor question code approved by the Department
Student Answer 10	Char (1)	Student Answer to unique question
Valid Question 11	Char (3)	Unique sponsor question code approved by the Department
Student Answer 11	Char (1)	Student Answer to unique question
Valid Question 12	Char (3)	Unique sponsor question code approved by the Department
Student Answer 12	Char (1)	Student Answer to unique question
Valid Question 13	Char (3)	Unique sponsor question code approved by the Department
Student Answer 13	Char (1)	Student Answer to unique question

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Valid Question 14	Char (3)	Unique sponsor question code approved by the Department
Student Answer 14	Char (1)	Student Answer to unique question
Valid Question 15	Char (3)	Unique sponsor question code approved by the Department
Student Answer 15	Char (1)	Student Answer to unique question
Valid Question 16	Char (3)	Unique sponsor question code approved by the Department
Student Answer 16	Char (1)	Student Answer to unique question
Valid Question 17	Char (3)	Unique sponsor question code approved by the Department
Student Answer 17	Char (1)	Student Answer to unique question
Valid Question 18	Char (3)	Unique sponsor question code approved by the Department
Student Answer 18	Char (1)	Student Answer to unique question
Valid Question 19	Char (3)	Unique sponsor question code approved by the Department
Student Answer 19	Char (1)	Student Answer to unique question
Valid Question 20	Char (3)	Unique sponsor question code approved by the Department
Student Answer 20	Char (1)	Student Answer to unique question
Valid Question 21	Char (3)	Unique sponsor question code approved by the Department
Student Answer 21	Char (1)	Student Answer to unique question

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Valid Question 22	Char (3)	Unique sponsor question code approved by the Department
Student Answer 22	Char (1)	Student Answer to unique question
Valid Question 23	Char (3)	Unique sponsor question code approved by the Department
Student Answer 23	Char (1)	Student Answer to unique question
Valid Question 24	Char (3)	Unique sponsor question code approved by the Department
Student Answer 24	Char (1)	Student Answer to unique question
Valid Question 25	Char (3)	Unique sponsor question code approved by the Department
Student Answer 25	Char (1)	Student Answer to unique question
Valid Question 26	Char (3)	Unique sponsor question code approved by the Department
Student Answer 26	Char (1)	Student Answer to unique question
Valid Question 27	Char (3)	Unique sponsor question code approved by the Department
Student Answer 27	Char (1)	Student Answer to unique question
Valid Question 28	Char (3)	Unique sponsor question code approved by the Department
Student Answer 28	Char (1)	Student Answer to unique question
Valid Question 29	Char (3)	Unique sponsor question code approved by the Department
Student Answer 29	Char (1)	Student Answer to unique question

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Valid Question 30	Char (3)	Unique sponsor question code approved by the Department
Student Answer 30	Char (1)	Student Answer to unique question
Valid Question 31	Char (3)	Unique sponsor question code approved by the Department
Student Answer 31	Char (1)	Student Answer to unique question
Valid Question 32	Char (3)	Unique sponsor question code approved by the Department
Student Answer 32	Char (1)	Student Answer to unique question
Satisfaction Code -	Char (1)	Acceptable Values
Student Satisfaction with Method of Delivery		1 = poor
		2 = fair
		3 = good
		4 = very good
		5 = excellent
Student Interest in the Course Code -	Char (1)	Acceptable Values
		1 = poor
		2 = fair
		3 = good
		4 = very good
		5 = excellent

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Usefulness of information within the course Code -	Char (1)	Acceptable Values
		1 = poor
		2 = fair
		3 = good
		4 = very good
		5 = excellent
Factors for choosing online course (up to 3 choices) Code - Course	Char (3)	Acceptable Values
		1 = Convenience of online access
		2 = Convenience of time
		3 = Cost
		4 = Limited/no availability of local classroom course
		5 = Other
Other Text Box	Char (50)	Open Answer
Ease of Use Code -	Char (1)	Acceptable Values
		1 = poor
		2 = fair
		3 = good
		4 = very good

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		5 = excellent
Date and Time of each Validation	Char (16) (mm/dd/yyyy) (hhmm AM/PM)	Date and Time of each Validation that a student passed or failed.
Method of each Validation	Char (2)	Initial Acceptable Values:
		01=Biometric—face recognition
		02=Biometric—key stroke
		03=Biometric—fingerprint
		04=Biometric—voice print
		12=Third Party Database questions
		13=Phone contact
		14=Online/Instant messenger tools
		15=Personal questions
		16=Content questions
		18=Email
Status/Result of each Validation	Char (4)	Pass or Fail

\*Valid Question X number will be obtained from sponsor provided list of unique questions asked during the course, where required.

Table 4 – Student Footprint Logs Table

Data/Column Name	Data Type - Length - Value	Description
Client ID	Char (9)	ID from NYS permit

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Start Date	Char (10) (mm/dd/yyyy)	Date Motorist Started Course
Start Time	Char (6) (hhmm AM/PM)	Start Time of OPL Course
End Date	Char (10) (mm/dd/yyyy)	Date Motorist Ended Course
End Time	Char (6) (hhmm AM/PM)	End Time of OPL Course
Total Time	Char (5)	Calculated based on End Date/Time
		- Start Date/Time. Captures overall
		time from registration through completion.
Last Module Completed	Char (2)	Sponsor designated code for where in application student ended session
Total Instruction Time in Minutes	Char (3)	Calculated based on sponsor's Department-approved calculation method. Excludes non-instruction time such as log-in procedures, administrative tasks, help functions, validation processes and audio/visual media download times.

Table 5 – Audio/Visual Requirements

Timing of Content to Determine Minimum Time Requirements are Met

Type of Content	Types of Material/ Specifications	Amount of Time Allowed
Multimedia	Audio and/or visual clips, where possible. Audio/visual should be in sync. Each clip shall be no more than 6 minutes in duration, except where approved by the	Actual play time of all audio/visual material.

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	<p>department. Material in written text can also be available as audio (verbatim or ad lib), to be played at the student’s discretion, which will determine course timing. The total passive/non-interactive video should not exceed 60 minutes of allowed time for online courses. Audio/visual clip download time shall not be unnecessarily long so as to disrupt the flow of the course or diminish the student's course experience.</p>	
Simulations & Exercises	<p>This can be “follow along” video or interactive audio/video that engages the user to evaluate a key learning point from the training (e.g., response time, range of motion, visual acuity, etc.)</p>	<p>Actual time of simulation or exercise, allowing sufficient time for user to follow along at required pace.</p>
Charts & Graphs	<p>Statistics included must be the most current available, and are expected to be updated annually at a minimum.</p>	<p>Allow 1 minute for each chart or graph.</p>
Written Text	<p>Including bulleted lists, captions, paragraphs and other written material. Time allowed will be a word count, when audio augmentation is not available, will be based</p>	<p>The result of total words divided by 100. This will be the time allowed.</p>



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	on a physical word count. The word count shall be divided by 100 words per minute.	
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