So we are recording this.

We are required to.

Uh record everybody all the participants so.

If you would pretty place instead of saying your name.

That kind of thing if you could tape.

Type your first and last name into the chat so that we could just record this.

We're still looks like we're.

Still, accepting folks into the.

Into the meeting, so we'll just wait a few minutes here.

They want to give everybody the opportunity to get logged in.
Dunn, Debra (DOL)

Good morning for those of you who are just joining this, this meeting is being recorded.

Dunn, Debra (DOL)

So we are required to document all participants so if you could pretty please.

Dunn, Debra (DOL)

Type your first and last name into the chat instead of we won't do introductions because.

Dunn, Debra (DOL)

Uhm.

Dunn, Debra (DOL)

We just have way too many people.

Dunn, Debra (DOL)

And I am going to type my name.

Dunn, Debra (DOL)

Running really slow.

Dunn, Debra (DOL)

For me, maybe because?

Dunn, Debra (DOL)

We've got so many people.

Dunn, Debra (DOL)

Still, being admitted.

Agnes Namutebi

131.

Agnes Namutebi

Delete line.
Dunn, Debra (DOL)
We went for.

Dunn, Debra (DOL)
Teams in really appreciate that we appreciate it.

Agnes Namutebi
I am hearing feedback from somebody so if you guys could be sure to mute.

Dunn, Debra (DOL)
Mikes I would appreciate that thank you.

Dunn, Debra (DOL)
OK.

Dunn, Debra (DOL)
So I am going to go ahead and get started.

Dunn, Debra (DOL)
Hello welcome to our webinar today. My name is Debbie Den and I am the data sharing program manager.

Dunn, Debra (DOL)
As I stated this is being recorded.

Dunn, Debra (DOL)
So, please be aware of that.

Dunn, Debra (DOL)
But we are going to be able to share this recording.

Dunn, Debra (DOL)
Come later in case anybody needs to get a copy of it.

Dunn, Debra (DOL)
Some if Eric if you could help me manage the admits thank you.
We are asking everyone to type their name into the chat.

Uhm we are required to record participants names.

And looks like we might have.

A few people on the telephone.

Unknown.

As well, who won't be able to type their name in the chat.

We will have those names those numbers recorded as part of the recording so.

Alright so.

Ho hum.

The worst is still coming in OK so.

Uhm.

So I've never done that women are not so I'm looking at 3:00 different screens and I apologize.
Dunn, Debra (DOL)
For if I'm not looking you straight in the eye.

Dunn, Debra (DOL)
Right uh but first of all.

Dunn, Debra (DOL)
Welcome I am amazed by the turn out this is far more than I expected. And we will have another webinar tomorrow. I believe it's at 8:00 o'clock in the morning and those that information is out to you.

Dunn, Debra (DOL)
Uh hum, but before we go through all of that.

Dunn, Debra (DOL)
Let's go ahead and just do a couple of introductions of for those of you who just joined and W Den and I'm the data sharing program manager here at DL.

Dunn, Debra (DOL)
Eric can you please introduce yourself?

Dunn, Debra (DOL)
Yeah, hi everyone.

Shields, Eric (DOL)
Shields our compliance manager DLL thank you.

Shields, Eric (DOL)
And James please.

Messer, James (DOL)
Hi good morning, I'm James.

Messer, James (DOL)
Sir I'm the contracts manager in the data management office.

Messer, James (DOL)
Thank you James for those of you who.
Dunn, Debra (DOL)
Food haven't realized yet Matt Lewin, who is our previously previous contract manager has still here. Within DL, but he's started a new data. Stewardship program and he's getting up that up and running so James is our contract manager and certainly last but not least.

Dunn, Debra (DOL)
Just come is Alex are you?

Dunn, Debra (DOL)
Odd here today somewhere yes, I am.

Beaulac, Alex (DOL)
Experiencing some bandwidth issues, so I mean, it goes there. My video, but I'm Alex Bell. Like I'm the admin assistant for Fred weighed the director of Open.

Beaulac, Alex (DOL)
Thanks Alex Alex is.

Dunn, Debra (DOL)
Gonna play a key role for us today and he's going to record comments and questions for us.

Dunn, Debra (DOL)
Uh because what we're going to be doing is out of both this session. Tomorrow's webinar and any questions or comments that are submitted to our group mailboxes we will be developing a FAQ.

Dunn, Debra (DOL)
And.

Dunn, Debra (DOL)
I just lost my screen.

Dunn, Debra (DOL)
What are you guys seeing it looks like I'm seeing if your email?

Dunn, Debra (DOL)
OK, that's not my email.
Dunn, Debra (DOL)
Did someone take control? Someone took control so we're looking at somebody's email?

Dunn, Debra (DOL)
Please relinquish control.

Dunn, Debra (DOL)
OK let's try this again.

Dunn, Debra (DOL)
I'm going to try to.

Dunn, Debra (DOL)
Uh present at the end.

Shields, Eric (DOL)
Anyway as

Dunn, Debra (DOL)
This is coming up.

Dunn, Debra (DOL)
Are you? Are you able to see my screen again?

Dunn, Debra (DOL)
Yes.

Dunn, Debra (DOL)
OK.

Dunn, Debra (DOL)
So anyway, what I was saying, is we're going to do a FAQ of sorts.

Dunn, Debra (DOL)
And be distributing that out, probably as updates, Cisco go as well. I was really hoping to have a kind of a website that we could just post this on stuff on and and things could get people could self serve themselves on the epic use and attachments and things like that. We just weren't able to do that, so as.
Dunn, Debra (DOL)

Uh RFA Q Gets updated we will be sending that out to the contract administrator or managers and for each service is the administrators.

Dunn, Debra (DOL)

Come on a regular basis, so that you guys will have all that information.

Dunn, Debra (DOL)

Uhm.

Dunn, Debra (DOL)

I'm sorry, it looks like I've lost. I I jumped ahead on the pages unfortunately.

Dunn, Debra (DOL)

When I somehow lost control of the screen.

Dunn, Debra (DOL)

What?

Dunn, Debra (DOL)

OK.

Dunn, Debra (DOL)

So dumb.

Dunn, Debra (DOL)

So first of all we're just for the agenda. We're gonna have an introduction to wax which is the acronym for administrative Washington administrative code, which are administrative rules, then we will have a just a brief overview of the new contract template.

Dunn, Debra (DOL)

Uh and Eric will go over the changes to the compliance in there.

Dunn, Debra (DOL)

Uh in that template we do wanna save the bulk of the time for the Q&A. So our presentations will be at a fairly high level.
Because we do want to hear your questions comments. That sort of thing and then James is going to do just a kind of a closing comments and summarize.

So last year substitute Senate bill 5152 passed in the Legislature. It is a a build that. Uh twist specific to DLL. And it created a few new statutes, which are there on the screen? And so.

You need to be aware of those, and go look at that statute. If you haven't already the bill, although off also authorizes DLL to make additional requirements, so in that statute under 4622010. It does say some specific things that DL is supposed to do contractually and then gives us the authority to make additional contract requirements.

And that's what this whack process and the contract template are all about.
For the most part well OK. I'll go into that for a second in a minute here. I don't want to jump ahead of myself. The law actually went into effect in July. But with the rulemaking that we're doing, and getting stakeholder input.

On our contract template we are anticipating that the the.

Draft or the wax and the contract templates will be effective November first of this year.

This is the first time we've done rulemaking for this and.

Uhm also for a broader.

Uh stakeholder input on our draft contract terms and conditions. So we're really excited about this because we really want your input.

Uhm.

Uh we are trying to balance we have a you know a responsibility to do so. The residents of Washington to protect their personal information.

But yeah, it's we also wanted to balance.

Uh our requirements with business needs as well, or concerns that are business partners have.

And so uh.
Dunn, Debra (DOL)
So that's what we're trying to do with this brand new process. We're very happy to be doing this, I've been wanting to do it for several years now and this is the first opportunity. We've actually had to do it, so and this will be the first opportunity where everybody will be on the same contract terms and conditions as well so as you're reviewing.

Dunn, Debra (DOL)
Uh the draft, Wack and the contract terms and conditions.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
We're asking you that, if something seems overly burdensome before rejecting it. You know off summarily just rejecting it. We're asking that you look at the rationale for that closet. It could be that maybe we didn't word it right or we could have worded it better. That kind of thing, so with that documents that we send out with the whack and the contract template there's a table.

Dunn, Debra (DOL)
In the opening pieces of those that I believe it's the right hand column that kind of talks about what our intent is here.

Dunn, Debra (DOL)
And so when providing comment back to us we ask that.

Dunn, Debra (DOL)
That you cite the specific clause or section that you're referring to that will help us understand.

Dunn, Debra (DOL)
Uhm exactly where you're focusing on help us to understand.

Dunn, Debra (DOL)
Uh your position and why you have a concern for it or why you're suggesting the change.

Dunn, Debra (DOL)
Uh hum.
That kind of thing, so that we can kind of understand and see from your perspective.

That's what's going on and we may also then want to call you and maybe have a conversation to understand it that further again.

Uhm.

Uh we will be developing a?

FAQ and distributing that.

Throughout.

The UM course of this.

Oh, Washington administrative code.

I don't know your guys is familiarity, but we have.

Statute that is enacted by the Legislature. Then the agencies have authority to do what we call rulemaking or make administrative rules and those have basically the same force and effect.

Of the statute and so our purpose here in rulemaking is to codify.
And kind of fill in the gaps to implement the law and at a high level.

The processes and procedures that deal will follow in sharing protected personal information. Now that's a new term, which I will go over with here in on the next slide.

Made.

And for the our purposes here.

It'll be very high level.

Uh and again, I will refer you back to that chart that table that we provided with the whack for the intent of each section? What we're trying to do there.

Right but there is a couple of things that I would like to go over.

I need to apologize my cat is meowing in the background in a so if you hear her. I apologize. She likes to participate so anyway, so there are few things in the definition section. We have, I believe there's 21 definitions. The term personal protected information because we have defined personal information in.

In Wack as well as identity information in Wack.

Uh but we just combined those 2 terms into protected personal information so it means both.

We.
Lisa Jones
Have also a new term customer.

Dunn, Debra (DOL)
Sure.

Dunn, Debra (DOL)
Customer is someone who?

Dunn, Debra (DOL)
Who uh an agent or a recipient may be requesting the data on behalf of but doesn't actually provide the data to them. They just process the data on their behalf.

Dunn, Debra (DOL)
There will be a requirement in the contract that when submitting for example, your sub recipient list. It's now being expanded.

Dunn, Debra (DOL)
To include customers as well, we feel that our Washington residents have a right to know who is getting their data and using their data, so that's what that is for?

Dunn, Debra (DOL)
Uh and then there are some terms that are almost interchangeable.

Dunn, Debra (DOL)
And so I wanted to kind of display it here in this table. The term recipient is not new.

Dunn, Debra (DOL)
Uh uh recipient is anyone who gets to read data directly from DL.

Dunn, Debra (DOL)
They could also be an agent.

Dunn, Debra (DOL)
Acting on behalf of somebody else to pull the record or they could be just the request are themselves.
And the request here is the person that has actual permissible use.

So.

In the example of our East services, we have some businesses that can just pull in ADR down download for themselves that would be a requester.

And also a recipient.

The sub recipient, sorry, I need to tuck in my cat here.

Sorry about that.

The sub recipient is someone who receives the personal information or the protected personal information from a recipient or an agent. They also can be an agent and they can also be the requester.

So our new legislation allows for multiple agents so for example.

Uh and which didn’t happen before, but for example, Bob’s pizza has hired an employment agency too.

You UM hired some drivers and manage their driving records for example, that employment agency uses a data broker.
Dunn, Debra (DOL)
The Who posted the data directly from us so the data broker is the recipient.

Dunn, Debra (DOL)
This sub recipient, maybe the agent or or and or the requester if Bob 's pizzas. Will it also ends up with
the data or bumps pizza could be the customer if they don't actually get the driving record.

Dunn, Debra (DOL)
And so there are agent can just be the recipient and they could also be a sub recipient.

Dunn, Debra (DOL)
And then Requester Is everybody could be everybody and depending on all the scenarios.

Dunn, Debra (DOL)
So I know it's confusing but I hope that will help as you read through these terminologies.

Dunn, Debra (DOL)
Uh and through our terms and conditions that might help understand.

Dunn, Debra (DOL)
Uh where we were going there.

Dunn, Debra (DOL)
And you will also notice that we put the definitions and whack that is for consistency. We want all all of
the terms or the definitions to be consistent across all data contracts.

Dunn, Debra (DOL)
So Speaking of data contracts.

Dunn, Debra (DOL)
Because we're doing this.

Dunn, Debra (DOL)
Uh stakeholder input we will not be negotiating contracts. We have done that in some instances, with
people in the past.
Uh we are doing this for a couple of reasons, one to gather everybody stakeholder input upfront. Everybody will have the same terms and conditions as everybody else with a few exceptions, so for example.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
Uh there are some terms and conditions requirements that might apply to driving records versus vehicle records and vice versa.

Dunn, Debra (DOL)
If you are a public entity versus a private entity there might be a few differences there. But generally speaking, everybody will operate under the same terms and conditions. It has especially in the private sector it will have.

Dunn, Debra (DOL)
Like uh effective leveling the playing field for everyone as well as make it much more easier on Derek 's team when trying to do all these audits. We have hundreds of contracts to audit at some point at some level and so to have different contracts and different terms and conditions isn't working for us so.

Dunn, Debra (DOL)
No uh.

Dunn, Debra (DOL)
So, please provide your input that's what this is for the rewrite of the contract.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
It you'll notice some things that have changed so the data licensing statements. We've moved some things that are specific to a particular data service or a particular type of data to the data licensing statement so that the general terms and conditions are consistent across all contracts.

Dunn, Debra (DOL)
Some of those requirements like for those who are required to do audits for driving records to make sure that that release of interest was signed.
That would uh you know that would be moved into the data licensing statement for driving records.

For the most part, though what we've done is.

Tried to not just to kind of memorialize our current practices. We are not changing a lot of the requirements themselves, although there are some and we will try to go over those for you.

We have done a lot of rewrite as we've gone through audits. We have learned that sometimes we didn't write a clause as clearly as we had intended to or it could have been interpreted a couple of different ways. That kind of thing. So we're trying to do that rewrite so that it's clear about what our requirements are in that everybody can understand better.

There are a couple contract requirements changes that I would like to try to go over and Eric will go over some as well.

We are now looking at requiring cyber liability insurance.

It is a new requirement and the clause that you have in the contract right now. The template is the old version. We are still working on trying to figure out how to do this and once we have a new clause drafted we will share that as well for stakeholder input. Our intent is to do it on a sliding scale so if you get a handful of records per year.

And you would likely not be required to.

Do uh have the cyber liability insurance and then as.
This yeah, the more records, you get the higher the requirement will be.

And we are looking at that it would be the number of records. You have on a person so for example, on driving records, you may.

Uh pull a record on a monthly basis throughout the year to ensure that you've got the most current information on them, but you're only doing it on one person so that would count as one record over the course of a year. It would not count as 12 for the purposes of cyber liability insurance.

And.

There are some things that we're also considering where.

We might be able to mitigate that up and we're we're considering.

Uh some factors where maybe if you recently had a data security with audit with us.

And whether there was deficiencies or not if he had deficiencies there were all corrected no deficiencies at all if you have.

Other things we're still trying to figure out what that is, but then we might be able to require a lower level of the cyber liability insurance.

Uhm so still still looking at that and when we have something more solidified that we can share with you and get your input on we will certainly do that.
Uhm one of the new requirements as well is and some of you already do this, but it will be a system requirement.

Dunn, Debra (DOL)
When you request, the record.

Dunn, Debra (DOL)
And this is for the bulk data customers not the East service customers at this point but the book data.

Dunn, Debra (DOL)
Uh.

Dunn, Debra (DOL)
We were going to ask you to you'll be required to both submit the the sub recipients name and the permissible use.

Dunn, Debra (DOL)
Again, that's for transparency reasons.

Dunn, Debra (DOL)
Or and the customer name customer name if you weren't if the.

Dunn, Debra (DOL)
Customer is not receiving the protected personal information. We believe that our residents have the right to know where their data is being used.

Dunn, Debra (DOL)
And sometimes if they see the name of a data broker.

Dunn, Debra (DOL)
They don't really understand that that data broker who shared the information on with their employer. For example, or their insurance company. They don't recognize the name of the data brokers so that's why we're asking for that requirement and then I mentioned earlier. The sub recipient versus customer. We are going to ask for like example on the sub recipient list. It'll be the sub recipient and customer list.

Dunn, Debra (DOL)
I think I covered that page and Eric.
Dunn, Debra (DOL)  
Would you like to?

Dunn, Debra (DOL)  
Discuss compliance changes.

Dunn, Debra (DOL)  
Yes, I would thank you Debbie.

Shields, Eric (DOL)  
So, in compliance one of things I want to lay out as a foundation between the RCW 's or or state statutes of the new wack the new rules in our contract.

Shields, Eric (DOL)  
I mean, we have a theme which is basically we're handling data on behalf of our customers are residents in a way that reflects a privacy framework. So you'll see themes about data minimization data retention. The shortest time possible conducting audits and so forth so that results in many of the requirements that you now see in the contract.

Shields, Eric (DOL)  
And at the end of the day that's what my team is responsible to enforce hence our compliance program.

Shields, Eric (DOL)  
Some things I want to point out First off we have a number of preemptions. There's a couple of things that arise over time. Uh one being that we're being asked to sign a non-disclosure agreement to protect the information that we're accessing with conducting an audit or an investigation.

Shields, Eric (DOL)  
Uh by entering into this agreement you basically accept the fact that we have accessed here audits without having to sign in non disclosure agreement. And if the wording in the agreement is not to your satisfaction.

Shields, Eric (DOL)  
And you think you would still need us to sign it, NDA before stepping into your audits, then we need that input because the requirement to sign an NDA causes delay and it's one that we're hoping to avoid the other piece. There is the exemption from disclosure. This is we have a public record act and it exempts from public disclosure data security audits that we've had a number of our entities attempt.
Shields, Eric (DOL)
Uh to claim that they don't have to disclose their audit because it's exempt and so we're removing that as well.

Shields, Eric (DOL)
Uh you're gonna see if there's a piece in here on a privacy requirements and what this is done. So we've encompassed data security permissible use and privacy into one umbrella set of requirements.

Shields, Eric (DOL)
And again this was back to this idea of a privacy framework where you have security permissible use and so on.

Shields, Eric (DOL)
Some of the biggest changes you're going to see here well. We want you to have privacy policies. We want you to understand the significance of protecting this information that we're sharing again. Our job is to give our residents confidence that every step of the way that where their data is being accessed. It is secure from harm.

Shields, Eric (DOL)
Uh next data disposal is one that stands out.

Shields, Eric (DOL)
Uh.

Shields, Eric (DOL)
What we're after here is that we want you to keep the data for as short a time as possible once it's been used.

Shields, Eric (DOL)
For the purpose that you requested it, it needs to be removed.

Shields, Eric (DOL)
And so we're looking for you to have a pretty tight policy on how long you gonna keep the data for business use and that's what will be auditing against.

Shields, Eric (DOL)
One of the big pieces here that pertains to the Fair Credit Reporting Act F CRA Fikru.
Shields, Eric (DOL)

Uh we've often heard that the FCRA is caused to keep data for a long period of time. We are taking that away as a basis to retain data there must be a sound legal basis for you to retain data not on the off chance that you’re hoping to protect yourself from a lawsuit.

Shields, Eric (DOL)

Audits previously we had audits defined under the terms and conditions. Now we've attached attachment. DD Delta to the agreement and so we've tried to lay out a couple of things one regarding you know the objectives of the audits road and you know what each audit will be testing you for.

Shields, Eric (DOL)

And it raises the information about corrective action plans an important note here is on the annual statement of compliance and this is where we are also then going to enforce their corrective action plan, so whether you are a boat customer service customer.

Shields, Eric (DOL)

You generally need to provide us with an annual statement of compliance and this is where it will be enforcing those as well.

Shields, Eric (DOL)

Ah.

Shields, Eric (DOL)

Other big things that pop out.

Shields, Eric (DOL)

Uh we will be invoicing now for the review of data security audits.

Shields, Eric (DOL)

The statutes have always read that the Department is not responsible for the cost of the audit and we've always absorbed our internal costs to review the audit.

Shields, Eric (DOL)

And with the new wax and with the new contract. We will be invoicing for that now. I want to point out that our invoices are typically in the neighborhood of 4 figures. And while that may sound like a lot. I'm going to point out that many states charged for their audits and we hear stories of them charging 5 to 6 figures for their audits. So we believe that the work. We're doing its due diligence. It's reasonable.
Shields, Eric (DOL)
And the prices are will be uh as.

Shields, Eric (DOL)
Best we can do the attachment does layout those areas that will be invoicing for so again. We're looking for your comments and feedback on that.

Shields, Eric (DOL)
One of the biggest things here when you have sub recipients in one that I'm sure is gonna cause a little bit of heartburn. Historically, we've had this aspect that you're required to pass through the requirements.

Shields, Eric (DOL)
As they pertain to securing data.

Shields, Eric (DOL)
Or the PPI is the term we use now are protected personal information or you passed that PPI through to a sub recipient. We want you to pass through the requirements and we've had.

Shields, Eric (DOL)
A host a whole number of versions of reasons, a White House pay successful or unsuccessful.

Shields, Eric (DOL)
How we want to make it simple and I know it appears burdensome if you're keen on this topic you know a 6 page. Addendum seems like a heck of a a task.

Shields, Eric (DOL)
But we wanna make it very clear on what requirements you need to pass through in your agreement with your sub recipients. I expect will have no shortage of feedback on this one, but that's the intent. We want to remove any.

Shields, Eric (DOL)
Any doubt on what we want you to pass through.

Shields, Eric (DOL)
2 now, so that's a big one, I look for your comments on that.
Shields, Eric (DOL)

Uh.

Shields, Eric (DOL)

I'm gonna make one last comment. I'm gonna make real quick.

Shields, Eric (DOL)

We have a couple of comments one we have a new type of audit for those of you with sub recipient side drive records. We used to call it a desk audit or a sub recipient audit, we now. Call it a consent audit or we're looking to see that you obtained the authorized consent from the named individual and we'll be doing that whether it be a bulk agreement and he's service agreement and so on, but that's the consent audit.

Shields, Eric (DOL)

Uh we're also making it very clear that you when you have some recipients need to audit your sub recipients.

Shields, Eric (DOL)

And we are not defining the term audit, but when it comes to that. Rather, we want you to do what a reasonable person would interpret that you did some due diligence to make sure that your sub recipients were in compliance with the Washington addendum. So there's no expectation that you're requiring a sock to type 2 audit, but instead it's gotta pass what I call a straight.

Shields, Eric (DOL)

Face test that you did some due diligence, so happy to answer any questions later and so forth, but that's a rough outline of the compliance pieces and some of the requirements that you'll find in the client track some of that.

Shields, Eric (DOL)

Back to You Debbie.

Shields, Eric (DOL)

Thanks, Eric.

Dunn, Debra (DOL)

We are.
Make sure I got the mouse is moving on to our Q&A section and appropriately. We've got a Q and so Eric there's a question in the chat related to.

Dunn, Debra (DOL)
The slide that you purchased on would you like me to read that for you?

Dunn, Debra (DOL)
I see it if that's the.

Shields, Eric (DOL)
Question from William is that right? Yes.

Shields, Eric (DOL)
Uh consideration being given to having an itemized invoice well, I just changed.

Shields, Eric (DOL)
Yeah, so for long question.

Dunn, Debra (DOL)
Bye bye OK, so for those of you on the phone.

Shields, Eric (DOL)
Phone this is the question is there any consideration being given to having an itemized invoice option or perhaps an itemized list available upon request.

Shields, Eric (DOL)
When we've had issues with discrepancies in the past, we have been unable to identify which user was at fault for corrective action.

Shields, Eric (DOL)
Ah.

Shields, Eric (DOL)
Let me think about this for a second Mister understand it properly.

Dunn, Debra (DOL)
See you tomorrow, I do want to point out.
Dunn, Debra (DOL)
That the answer is that we're going to give here today are just the verbal answers or preliminary until we can do formal review of all our questions and make sure that we understand the question you know that kind of thing, so look for your FAQ coming.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
To formally answer the questions but I think both Eric and I have a relatively good grasp.

Dunn, Debra (DOL)
I'm not our intentions are so hopefully, we'll be able to give you a good, solid answer.

Shields, Eric (DOL)
A question from William Monroe Yeah, I think that David Itemized Invoice is doable. It's a sound suggestion and one that we will look at so that you know which parts of it.

Shields, Eric (DOL)
Uhm burn what which parts of the invoice pertained to which activity on our part.

Shields, Eric (DOL)
So we'll take that under advisement.

Shields, Eric (DOL)
And then to the comment that you've had issues with discrepancies in the past and being unable to identify which user was at fault.

Shields, Eric (DOL)
Uh for corrective action.

Shields, Eric (DOL)
Uh.
Shields, Eric (DOL)
I need some more color on that one or some additional information to understand that's a question or just in statement.

Shields, Eric (DOL)
And William if you're there, you we would come off, mute and talking about that one real quick sure Eric thank you.

Munroe, William
I apologize the there wasn't perhaps very clear.

Munroe, William
The the topic of audits brought me to our use logs or or look at logs that we maintain we've got 14 employees and at 1:00 point, all of us had access and and utilized the service.

Munroe, William
We failed an audit couple years back because somebody must not have logged something or something like that, so since then. We have checked we get an invoice. It's for you know $4.10 or whatever.

Munroe, William
Alright so wouldn't that $4.12.

Munroe, William
And you know, we divide that amount by 4 cents we know how many.

Munroe, William
Uh how many searches we did, and then I compare that to how many searches are logged.

Munroe, William
But if there's a discrepancy. I don't have a way to find out who.

Munroe, William
Did a search that wasn't locked?

Munroe, William
And that's a problem because obviously.
Munroe, William
We need to correct that persons using program so is that an an Easter.

Dunn, Debra (DOL)
Yes yes.

Dunn, Debra (DOL)
Uh and administrator I believe should have the right to see you what everybody looked at.

Dunn, Debra (DOL)
And so we there's I believe there's some user guides on that Susan can you Debbie this? Yeah, this is
Susan?

Mitchell, Susan (DOL)
No CPS that is one option, CPS does not provide but the the people on our side that doing the audits. They could provide the information to the administrator. We can run a report here and provide it to the administrator.

Mitchell, Susan (DOL)
That's correct.

Mitchell, Susan (DOL)
Think I'll mute myself in just a moment is is it.

Munroe, William
Possible to request that prior to an audit so if I recognize oh in January, we added discrepancy.

Munroe, William
I'd like to audit ourselves is that possible.

Munroe, William
Yes, you can just submit.

Dunn, Debra (DOL)
It's a request to our data services group box.
Dunn, Debra (DOL)
Wonderful thank you, yeah, yeah.

Dunn, Debra (DOL)
Now that we like to introduce Susan Mitchell, many of you probably have worked with her on the services side.

Dunn, Debra (DOL)
Uh she is a lifeline for a lot of our E services folks and so appreciate that you're here today, Susan to help us.

Dunn, Debra (DOL)
Answer the questions she is much more of a subject matter expert on the.

Dunn, Debra (DOL)
These services than I am so.

Dunn, Debra (DOL)
I also want to say I do believe that we

Mitchell, Susan (DOL)
We have that on our list of to do's to add that function that the administrators.

Mitchell, Susan (DOL)
Uh we have that ability because that is on some of our other services. Like I believed apps and Diaz has ability so we do have that our To Do List to add that to CPS great thank you.

Dunn, Debra (DOL)
so just so you know, we have a long list of things that we would like RIT Department to do to improve our our data services.

Dunn, Debra (DOL)
And unfortunately right now they are very short handed.

Dunn, Debra (DOL)
And UM have quite a large backlog of work to do, including some really high priority stuff like implementing legislation.
Dunn, Debra (DOL)
So we don't anticipate that.

Dunn, Debra (DOL)
Our stuff is going to get any attention soon but that doesn't mean we're going to let go of the idea.

Dunn, Debra (DOL)
Will still be pushing to have our stuff done just when our IT staff.

Dunn, Debra (DOL)
Team is back staffed up and they've caught up on their battle backlog so thank you for your patience on that.

Dunn, Debra (DOL)
OK next question.

Dunn, Debra (DOL)
Uh if I can paraphrase 'cause it's kind of a long question you guys. It looks like you use contracted plate search and get charged with a 4 cents a record, but you often?

Dunn, Debra (DOL)
Uhm request very few records and so you get.

Dunn, Debra (DOL)
You know these tiny bills.

Dunn, Debra (DOL)
Uh we can certainly work we do have some.

Dunn, Debra (DOL)
That we build a less frequently than monthly like quarterly or something like that, we could work with Accounting Department on that.
And then also the other question on that was can. We just not charge if there's you know a minimum amount of records will have to look into that. We are required to charge fees in some areas.

00:43:31.210 --> 00:43:39.100
Dunn, Debra (DOL)
And so I would have to look into that to see what our flexibility is there, but it's it might be a good idea.

00:43:43.020 --> 00:43:46.570
Dunn, Debra (DOL)
And Jason did that kind of answer your question.

00:43:49.070 --> 00:43:49.490
Dunn, Debra (DOL)
That's right.

00:43:50.090 --> 00:43:52.350
Shields, Eric (DOL)
Yes, I did thank you OK thanks.

00:43:56.990 --> 00:44:10.800
Dunn, Debra (DOL)
Federal.

00:44:01.720 --> 00:44:07.660
Dunn, Debra (DOL)
Oh, OK what's the curls asking what the difference is between a bulk punts customer and any service.

00:44:08.820 --> 00:44:10.800
Dunn, Debra (DOL)
So yeah, the

00:44:11.590 --> 00:44:23.810
Dunn, Debra (DOL)
uh it's not really about the volume, although the work term bulk kind of implies that it's really how you get your data so come on East service is almost like.

00:44:24.970 --> 00:44:42.400
Dunn, Debra (DOL)
Uh and app. Maybe that you, you log directly in to our service whether it be contracted plate. Search driver record request abandoned vehicle reporting. You log directly into our system and you can request the record or do whatever you’re doing.

00:44:43.030 --> 00:44:45.980
Dunn, Debra (DOL)
Uhm directly in our system.
The other the book is either a web interface or SFTP process where we generate the file put it out on the secure.

00:45:01.630 --> 00:45:12.560
Dunn, Debra (DOL)
Site and then the customer picks it up from that, and then uses the data. From there, so that's kind of the 2 differences. I hope Carol did that help you understand.

00:45:16.060 --> 00:45:17.520
Dunn, Debra (DOL)
The thumbs up or

00:45:21.190 --> 00:45:21.680
Carol Landwehr (Guest)
OK.

00:45:24.620 --> 00:45:25.870
Carol Landwehr (Guest)
OK, well, I'm going to move on.

00:45:26.430 --> 00:45:28.460
Dunn, Debra (DOL)
yeah, I'll do it, I'll take the next month.

00:45:28.850 --> 00:45:29.190
Shields, Eric (DOL)
OK.

00:45:29.600 --> 00:45:54.150
Shields, Eric (DOL)
And then so this is from Alex and it talks about the you know the 5 figure range on invoices when conducting audits and and this question. The concern that you know city of Tacoma would they be paying you know thousands of dollars or more for us to perform an audit when they only request a small number of records each year.

00:45:55.110 --> 00:45:56.860
Shields, Eric (DOL)
So I want to point out.

00:45:57.450 --> 00:46:10.600
Shields, Eric (DOL)
Uh when I throw out those figures earlier. That's when we audit. The larger the the bulk data recipients where they are required to undergo idea to security audit permissible use on it.

00:46:11.990 --> 00:46:13.090
Shields, Eric (DOL)
Every few years.
Shields, Eric (DOL)
The E services that perhaps you're referencing how we have the discretion and you see that in the contract template. We have the discretion to conduct an audit, but it's a risk based approach a day in day out. It's gonna be simple submit your annual statement compliance because there's just no way for us to audit thousands of East service customers on a practical basis, so we would do it.

Shields, Eric (DOL)
Or risk based if we had caused because of some large risk that we encountered there would be a series of discussions at the end of the conversation. It could lead to an audit, but I would suggest that the.

Shields, Eric (DOL)
The probability of us auto tenant E service to the tune of $1000.00 or more is very, very, very low.

Carol Landwehr (Guest)
Thank you.

Dunn, Debra (DOL)
The next question is probably for you as well. Can you please clarify why federal law if RCA does not or data?

Dunn, Debra (DOL)
Retention requirements aren't necessary when other jurisdictions require it.

Dunn, Debra (DOL)
A great question.

Shields, Eric (DOL)
And one that we've debated with folks the last several years. I wanna read of the FCRA in conjunction with opinions that we've received from council and they attorney generals office is that we don't find a data retention requirement in federal law. We see, there's a disposal requirement to dispose of the data. But it speaks to the technology used so that the data is rendered unrecoverable, but there's no timeline that we can.

Shields, Eric (DOL)
Find an on this topic in the absence of us seen definitive statutory guidance from the federal agencies on this topic. We are importing our take on the matter. So if there is citations that we can see if there is a specific that can be brought to our attention will absolutely consider it but were unable to find that at this point, so that's our approach when it comes to.
Shields, Eric (DOL)
Retention and disposal of the PPI.

Shields, Eric (DOL)
Yeah, so.

Dunn, Debra (DOL)
With that, if I may just kind of add as is then that we have to rely on the data has a permissible use once that permissible use has been accomplished.

Dunn, Debra (DOL)
Uh you know you've got their driving record you being your hiring decision or you know for parking purposes or whatever. You're using the data for then that permissible use has been met and the data is no longer retained now in the case of on the clarified that a little bit so for instance, in parking or tolling.

Dunn, Debra (DOL)
Uh you know you may not need that data a little longer to actually collect from the person.

Dunn, Debra (DOL)
That's fine once you've collected or cleared out that you know record or account or something or excuse me account, then that record can be deleted so.

Dunn, Debra (DOL)
Hey it's

Dunn, Debra (DOL)
I'm gonna take out of that.

Shields, Eric (DOL)
Like in yes object to legal record retention requirements, so like in Washington public agencies have record retention requirements. So that would factor into that conversation as well. That's a good point. Thank you.

Dunn, Debra (DOL)
OK, OK, so next question also for you, or how often will the audits be done so.

Shields, Eric (DOL)
There's 2 types of audits and then let me break this out there's 2 types of customers that were
recipients. We have our E services and we have our bulk data. Let me speak to the East purposes. First we consider the annual statement compliance where that's a requirement in your contract.

Shields, Eric (DOL)
A type of audit so we are testing for compliance and looking to get your acknowledgement to that fact going back to the question, we had earlier from city of Tacoma. It's a risk based approach. If we see problems that warranted further investigation that could trigger a more in depth audit, but free services.

Shields, Eric (DOL)
Think of the annual statement of compliance as the audit on the bulk data side where we are required to conduct the audit. We have followed the practice from our office of the chief information officer where state agencies are required to do in a triennial Oreo and audit every 3 years now. So we've borrowed that as a best practice. But the bulk data recipients will note that again. Here we're looking at a bit of a risk based approach.

Shields, Eric (DOL)
Yeah, well, we can identify lower risks and we are going to extend that we will extend that out to 4 years. However, we see high risks. It could be every 2 years. So we're looking for about a median 3 year but figure it's no more.

Shields, Eric (DOL)
I should say no last night at least once every 4 years before the bulk data recipients have both uh uh permissible use and data security on it.

Shields, Eric (DOL)
Thank you Eric.

Dunn, Debra (DOL)
Elizabeth is asking we use these services law enforcement and I'm unable to see what each user polls. So will we be able to get more access to review Elizabeth. May I ask what you service, you are using?

Carol Landwehr (Guest)
Yes, it's daps.

Carol Landwehr (Guest)
OK.
Massa, Elizabeth
Susan can you help me with that.

Dunn, Debra (DOL)
It just administrators that can see.

Dunn, Debra (DOL)
Or is IT managers as well.

Dunn, Debra (DOL)
I believe it's just administrators.

Mitchell, Susan (DOL)
OK, so that's

Dunn, Debra (DOL)
'cause that's a

Dunn, Debra (DOL)
the limitation in the system if you need to see what?

Dunn, Debra (DOL)
What?

Dunn, Debra (DOL)
Uh users are pulling ask your administrator to pull that report.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
At this point, I don't think we have.

Dunn, Debra (DOL)
And intend to expand that.
Dunn, Debra (DOL)
Come to see.

Dunn, Debra (DOL)
Uh.

But if you see that there might be a need for managers to have that we could look into it again.

Dunn, Debra (DOL)
Uh it would probably be quite a while from now because of RIT resource issues.

Carmen, please clarify your position of changing or charging for reviewing of the data security audits.

Eric you wanna yeah, so does he continue the question there.

Shields, Eric (DOL)
Uh is that isolated to reviewing it data security audits or are you intending to charge for the 3 year permissible use audit.

Shields, Eric (DOL)
Uh so we already charge for the permissible use audit and that's something that we've done since day. One now that's the time that we've spent when conducting the audit, so there's a description of that in the audit table under cost of audit. It lays out the things that we would be invoicing for.

Shields, Eric (DOL)
And then it would also that apply to the data security audits as found in that first column of detail in the table, so to answer both types of audits that will be invoiced.

Carol Landwehr (Guest)
And again that is because.

Dunn, Debra (DOL)
As the statute now requires that we are not responsible for the cost to be on it.
A question from Alex I missed zero and my previous question $10,000.00 audit.

So that's a worst worse.

Case scenario we've seen the.

Again, this, who go back to when we were doing the work and well when we've been doing the work the Odyssey bring in the range of 3 to.

When we're not traveling it's in the neighborhood of 3 to 4 hours even say $5000.00.

Ah.

It's really hot permissible you cited we haven't done.

And we haven't invoiced for data security audit yet so we don't know what that's going to look like. But I imagine it's going to be similar.

It really I think part of it.

Also in

for at least data security it would depend on the complexity.

Of the environment? How much you're getting for example, we have some recipients who get multiple
types of data driver vehicle vessel data so they use E services and book data interfaces and so you know the bigger.

00:55:12.870 --> 00:55:13.630
Dunn, Debra (DOL)
The UM.

00:55:14.620 --> 00:55:16.700
Dunn, Debra (DOL)
And the variety of data the bigger the audit.

00:55:20.550 --> 00:55:28.480
Dunn, Debra (DOL)
Can we get an estimate invoice prior to signing at as we have to get approved prior to budgeting and asking for money.

00:55:30.760 --> 00:55:31.020
Dunn, Debra (DOL)
Is?

00:55:30.900 --> 00:55:33.230
Carol Landwehr (Guest)
Not related I assume that's related.

00:55:33.110 --> 00:55:36.100
Dunn, Debra (DOL)
To the audit question, yeah, and we can do that.

00:55:36.580 --> 00:55:39.480
Shields, Eric (DOL)
Uh again, it's gonna be basis, Debbie just pointed out.

00:55:40.650 --> 00:55:43.860
Shields, Eric (DOL)
Size of the system number of records pulled cetera.

00:55:44.930 --> 00:56:02.560
Shields, Eric (DOL)
So we can give a range to give you an idea and that's one of the things that we've been by trying to get this out now is so that those who are developing their budgets. In the coming year. I don't see us invoicing for the data security audits until on next year 2023.

00:56:03.440 --> 00:56:05.040
Shields, Eric (DOL)
When this gets up and operational.

00:56:06.200 --> 00:56:08.810
Shields, Eric (DOL)
So there's time and, yes, we can provide an estimate.
Shields, Eric (DOL)
And since we now have.

Dunn, Debra (DOL)
Done some permissible use on its several of them. I think where we would be better at estimating them, then we were.

Dunn, Debra (DOL)
Prior to ever doing them before so.

Dunn, Debra (DOL)
Let's see.

Carol Landwehr (Guest)
Jason you're welcome.

Dunn, Debra (DOL)
Paula.

Carol Landwehr (Guest)
I have kept all this.

Dunn, Debra (DOL)
Driving records, I have run in a locked cabinet so you're stating I need to shred all the records.

Dunn, Debra (DOL)
This is for employees OK.

Carol Landwehr (Guest)
Here.

Carol Landwehr (Guest)
Doing work in Israel.

Dunn, Debra (DOL)
Could you OK? Could you explain?
Carol Landwehr (Guest)
OK, so uhm.

Dunn, Debra (DOL)
For employment purposes.

Dunn, Debra (DOL)
You’re not gonna have to research that one do you know the answer to that one Eric?

Dunn, Debra (DOL)
I don’t, either.

Shields, Eric (DOL)
And I would defer to what the legal requirements are yeah, if it’s your policy to keep the records we
would look for a lot to back that up.

Shields, Eric (DOL)
'cause we are going to insert that our contract made trump a discretionary decision spouse and policy at
year end so.

Shields, Eric (DOL)
Uh.

Shields, Eric (DOL)
Yeah, it’s important, yeah, sorry, yeah, so for example, if you’ve got driving record.

Dunn, Debra (DOL)
Periods of commercial drivers license commercial drivers there might be some.

Dunn, Debra (DOL)
Transportation laws well Israel. I don’t know, but like FM CSA or US Department of Transportation might
require that you keep those records while the persons employed or something like that, so you would
have to defer to whatever this requirement is.

Carol Landwehr (Guest)
And that doesn't answer it.
Shields, Eric (DOL)
Paula, please let us know.

Carol Landwehr (Guest)
OK next question was is so deep.

Shields, Eric (DOL)
Yes, it's service, it is it is a service.

Dunn, Debra (DOL)
That is specifically designed for courts to use to interface with us to adjudicate records too.

Dunn, Debra (DOL)
You dumb submit forms to us that kind of thing we do have a couple of.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
Uhm other types of users in that system, especially since we've added more functionality than service. But Yes Diaz is any service.

Carol Landwehr (Guest)
I'm gonna take the next question this is.

Shields, Eric (DOL)
John King.

Shields, Eric (DOL)
Clarify for me, please have a group of 3 to 4 officers using DAP switches are a driver and plate search. I used by law enforcement primarily.

Shields, Eric (DOL)
Uh.

Shields, Eric (DOL)
And they request registered owner information on approximately 8 to 10,000 times a year. Does that mean we are subject to thousands of dollars worth of audits.

00:59:34.580 --> 00:59:38.250
Shields, Eric (DOL)
Uh in a worst case scenario yes.

00:59:39.090 --> 00:59:50.770
Shields, Eric (DOL)
Practically speaking, no again in the in the dapps being one of our E services. We are going to lean on the annual statement of compliance.

00:59:52.110 --> 00:59:59.570
Shields, Eric (DOL)
I go back again if the risks are there and we would talk to you and go down that path up doing an audit?

01:00:00.220 --> 01:00:09.250
Shields, Eric (DOL)
In my 5 years being with the program. We have never conducted an audit or had cause to conducting audit button Eservice customer so.

01:00:09.970 --> 01:00:18.000
Shields, Eric (DOL)
This is one of those things that you see in the contract. It gives us the right. But the odds of us exercising that are limited.

01:00:22.060 --> 01:00:23.340
Carol Landwehr (Guest)
Uh a question.

01:00:23.240 --> 01:00:30.300
Dunn, Debra (DOL)
And from Elizabeth related to daps and law enforcement and the retention of the records.

01:00:31.330 --> 01:00:39.170
Dunn, Debra (DOL)
For government entities like law enforcement we rely on you to follow your record retention policies.

01:00:40.370 --> 01:00:41.730
Dunn, Debra (DOL)
For keeping the record.

01:00:43.600 --> 01:00:44.160
Dunn, Debra (DOL)
So.

01:00:44.800 --> 01:00:46.410
Dunn, Debra (DOL)
You know each.
State governmental entity has a requirement to have record retention policies for that. Please rely on those.

And we accept those I'll just say.

From your statement earlier that when personal information is gathered that person must be informed of the access of their information.

At.

The consent requirement.

Yeah, not necessarily there are some.
Dunn, Debra (DOL)

Uhm instances, so for.

Dunn, Debra (DOL)

Uh we for an attorney or an investigator requesting vehicle owner information for example, we have to notify them that the record was given to an attorney or an investigator we don’t say who.

Dunn, Debra (DOL)

Uh there are and have been several privacy bills.

Dunn, Debra (DOL)

Uhm introduced both at the federal and state level.

Dunn, Debra (DOL)

And so.

Dunn, Debra (DOL)

Uh we are anticipating that that's going to be a contractor a legal requirement at some point but.

Dunn, Debra (DOL)

Uh we are kind of getting ahead of that and requiring it now that you let us know.

Dunn, Debra (DOL)

Who that record is 4?

Dunn, Debra (DOL)

So that the the owner of that record can.

Dunn, Debra (DOL)

Uh have transparency about how their data is being used.

Carol Landwehr (Guest)

We don’t uh in the.

Dunn, Debra (DOL)

OK, well, except for the case of.
Dunn, Debra (DOL)

Where legal recent consent is required or the attorney investigator scenario that I just mentioned we don’t typically proactively email anybody and say, Hey, you know, so and so we pulled your record for insurance underwriting or anything like that. But if they call and ask us. We want to be able to tell them what how their data is being used.

Dunn, Debra (DOL)

Um from car end.

Dunn, Debra (DOL)

I apologize if you already covered this, but I recall seeing in the summary that there is a $20,000.00 several penalty. How do we see that pedal? How do you see this penalty being applied? Yes, there is we’ve always had criminal penalties in LA for the misuse of data now under our new legislation. There is up to $20,000.00 civil penalty per incident.

Dunn, Debra (DOL)

Uhm it incident is defined in the back.

Dunn, Debra (DOL)

Thank you.

Dunn, Debra (DOL)

How it is it is?

Dela Cruz, Micah

Yes.

Dela Cruz, Micah

Yeah, and so.

Dunn, Debra (DOL)

Uh we are still developing our processes around that doing some research about how other agencies. Uh assess those penalties working with our AG’s office so we don’t have really anything built yet about how that would be assessed. But I I believe? What are our intent would likely be first? Is you know education first you know this is for someone who is?
Dunn, Debra (DOL)

Uh.

Dunn, Debra (DOL)

Blatantly intentionally.

Dunn, Debra (DOL)

You know the negligently using the data we find that misuse often is just a mistake. Or they didn't understand it was kind of an innocent thing? Whatever so we have found that education solves the problem and I think that's where we will go first. But for the civil penalties. It would really have to you know rise to a level.

Dunn, Debra (DOL)

Higher than

Dunn, Debra (DOL)

you know.

Dunn, Debra (DOL)

Ah just a mistake or something like that, or a misunderstanding or.

Dunn, Debra (DOL)

Or something like that, but when we have that I believe we will be beginning stakeholder input once we have that process outlined and identified.

Carol Landwehr (Guest)

Let's see.

Dunn, Debra (DOL)

Can I pay the invoice using a credit card?

Dunn, Debra (DOL)

It depends.

Dunn, Debra (DOL)

Uh.
And I'm trying to think here most.

Mars E services.

So we have one of the things that we would love to have in for example, driver record request is that when you do that record instead of doing the a Ch.

That you'd be able to put in credit card information and pay that way. That is one of those system updates that we've been waiting for since the beginning.

Since DRR was created so we're hoping to have that in in the future at some point.

I'll have to research the rest of this with our.

Uhm accounting Department, but if I recall. I had a conversation it's been years. Now, with our accounting Department that they did not have the capability to accept credit cards.

It's yeah, it headquarters.

The only
well let's get updated information on that 'cause I know you can go into a licensing office and use a credit card. If you're renewing your driver's license or something like that. Let us get us UN updated information on that one.

01:06:52.560 --> 01:06:54.300
Carol Landwehr (Guest)
OK, thank you Paula for that clarification.

01:06:54.220 --> 01:06:56.110
Dunn, Debra (DOL)
Nation that it is.

01:06:58.050 --> 01:06:58.350
Dunn, Debra (DOL)
Is?

01:06:58.240 --> 01:06:59.050
Carol Landwehr (Guest)
Cereals.

01:07:01.040 --> 01:07:03.490
Carol Landwehr (Guest)
Not my policy, yeah, yeah.

01:07:03.410 --> 01:07:05.820
Dunn, Debra (DOL)
So if if you're following a law.

01:07:06.700 --> 01:07:08.170
Dunn, Debra (DOL)
You have to follow the law.

01:07:11.920 --> 01:07:14.350
Dunn, Debra (DOL)
Driving records not DLTR CDL.

01:07:17.010 --> 01:07:19.660
Dunn, Debra (DOL)
OK, another question.

01:07:20.600 --> 01:07:34.780
Dunn, Debra (DOL)
Will it be mandatory for customers to have cyber liability insurance? Which would include E services customers. Some eservice customers may be required to have it. We're still working out that scale.

01:07:35.750 --> 01:08:01.600
Dunn, Debra (DOL)
But I believe most eservices folks will not because you don't raise to that level of having uh getting enough records. There are a few who are heavy users of these services and they might fall under that,
but again, it would be a scaled approach. So you may not have to have the $10,000,000.00 worth of insurance. Maybe you have you know the the bare minimum amount of insurance required?

01:08:07.420 --> 01:08:08.990
Carol Landwehr (Guest)
Sorry my thing jumped.

01:08:09.450 --> 01:08:11.740
Dunn, Debra (DOL)
For cyber liability insurance.

01:08:13.140 --> 01:08:20.450
Dunn, Debra (DOL)
Do you have a single agency in mind or would we have to have an agent that handles that type of insurance?

01:08:21.510 --> 01:08:25.410
Dunn, Debra (DOL)
You know, we cannot recommend any kind of insurance company.

01:08:25.970 --> 01:08:35.290
Dunn, Debra (DOL)
Uh we would just tell you what the requirement is you can use your insurance broker. There are some requirements that it be.

01:08:35.340 --> 01:08:53.840
Dunn, Debra (DOL)
The insurance agent licensed to do business in Washington and have a certain rating that those requirements are already in the insurance requirement clause and we don't anticipate that change, they have to like a a one rate minus rating or something like that.

01:08:55.210 --> 01:09:01.600
Dunn, Debra (DOL)
Those requirements aren't changing but yeah, you would just use whoever you choose.

01:09:05.910 --> 01:09:07.550
Carol Landwehr (Guest)
OK and that's calcium.

01:09:07.810 --> 01:09:09.470
Dunn, Debra (DOL)
Not Mikes, not working so.

01:09:10.480 --> 01:09:18.330
Dunn, Debra (DOL)
Uhm I did I skip any questions accidentally 'cause my little thing was scrolling up and down.
I think that's everything that I see so.

Wait.

I will pop.

I was just to see if anybody else.

Wants to answer ask any other questions.

Before we go on to our closing remarks. I will reiterate again. This meeting is being recorded for those who I've noticed throughout the meeting. People were jumping on could be that you lost connection and you came back on, but we're asking for folks if you haven't already typed your type here first and last name into the chat were required to document that for recorded meetings.

Uh and also I'll just reiterate that out of all these questions and comments. We will be developing a frequently asked questions and distributing that out, as it gets updated we do have a webinar tomorrow.

And will likely.

May see some of you back, I don't know.

We will if you can't come back tomorrow. That's fine. We'll capture the questions you know, and put him in our FAQ hello.

Excuse me can you hear me? Yes.
Unfortunately for some reason.

I cannot use the chat box so I cannot put in my name OK. I could see your name on the screen.

So we're I think we're good.

Perfect yeah.

Diligence on that thank you.

Check.

Will we eat?

When will we hear from you on the new car new contract OK so in that minute or so. James is going to go over next steps in that kind of that process.

Is the weather like tomorrow going to cover the same stuff the opening will be the same?

Uh.

Other questions may vary because the people may vary, but again we will capture those in our FAQ some of the questions will be.
Some similar we so we may not use him for vad verbatim in the FAQ but will try to capture everything in both the question and the response, especially the response.

01:11:49.160 --> 01:11:50.950
Carol Landwehr (Guest)
Uh using your service.

01:11:50.830 --> 01:11:55.670
Dunn, Debra (DOL)
Chris is do you have to have cyber security?

01:11:58.050 --> 01:12:00.190
Carol Landwehr (Guest)
Well, it depends on that.

01:12:00.060 --> 01:12:07.430
Dunn, Debra (DOL)
It's uh if you are just using our system. You are logging into our system and I believe the security.

01:12:07.940 --> 01:12:09.490
Dunn, Debra (DOL)
Uh covers that.

01:12:10.220 --> 01:12:27.390
Dunn, Debra (DOL)
Uh if you print out a hard copy. There are security requirements for that hard copy earlier. It was mentioned that they keep it in the locked cabinet that kind of thing. The privacy requirements. Do outline those types of requirements that you have to have.

01:12:28.200 --> 01:12:42.840
Dunn, Debra (DOL)
If you turn around and you put that data in another system you get it off the services. You turn around. You entered into another system that system will have to have this meet the security requirements. Yes.

01:12:46.070 --> 01:12:47.580
Carol Landwehr (Guest)
If you look at it in.

01:12:47.460 --> 01:12:49.510
Dunn, Debra (DOL)
Our system and you don't.

01:12:50.470 --> 01:12:54.480
Dunn, Debra (DOL)
Print. It you don't copy anything down you just look at it and leave it right there.

01:12:55.730 --> 01:12:57.080
Dunn, Debra (DOL)
Our system will cover you.
Carol Landwehr (Guest)
My thing has been.

Dunn, Debra (DOL)
Moving so I'm hoping to capture everybody.

Dunn, Debra (DOL)
The annual audit for Diaz is usually in July correct.

Dunn, Debra (DOL)
Yes.

Dunn, Debra (DOL)
OK, thank you, it's a summertime when Christy.

Shields, Eric (DOL)
We will be reaching out as they've done yeah.

Shields, Eric (DOL)
Think it is the web and R 2.

Dunn, Debra (DOL)
Tomorrow at 9:30 or 8:00 o'clock as you mentioned earlier and James answered that below. Oh, thank you. James it's 930 I misspoke.

Carol Landwehr (Guest)
Ah.

Dunn, Debra (DOL)
Does Dill I'll provide a privacy and security context so that we can put our IT people in touch with DL for questions and ensuring our approach.

Dunn, Debra (DOL)
Our approach will achieve compliance.

Dunn, Debra (DOL)
Short answer that is.
There's a

no.

We take the approach that we tell you the what you determined the how.

Yeah, and.

We are happy to have a conversation with you to determine in advance of what you're proposing would normally satisfy the requirement.

I'm so happy to have that conversation, but as far as.

A more of a consulting service. We're not going to provide that we have reservations about ever endorsing someone plan.

But isn't event, you do follow that plan and something happens, then.

It could point back to us that the the deficiency is our fault because we endorsed the plan.

So, unfortunately, we don't have a point of contact on that. Yeah.

Sorry.

But if you need clarification on what the?
Requirement is happy to do that as well. Yeah.

And it would be if you have questions about that now and we'd like to hear about it now, so that we can make those clarifications in the contract template up front, so that everybody has the benefit of that same information.

So the next question is.

And you were James. Please speak to timeline for going live executing new templates. Yeah, that's part of James talking points coming up.

You know what I'm just gonna.

Go ahead and

but I'll still watch for questions.

But this is the next screen. So you can see that we will be talking about next steps. The new application process effective date set kind of thing.

Did you want me to just go ahead and start with the?

So it looks like we just got a couple more questions left.
Let's try to answer those.

As a request for an employer will we be given a contract.

That we provide a contractor who crosschecked directly with us. If we go back to the you know recipient versus requester versus subrecipient. Anybody who gets data directly from us.

We'll get have a contract with us.

That we provide a contractor who crosschecked directly with us. If we go back to the you know recipient versus requester versus subrecipient. Anybody who gets data directly from us.

We'll get have a contract with us.

That we provide a contractor who crosschecked directly with us. If we go back to the you know recipient versus requester versus subrecipient. Anybody who gets data directly from us.

Uhm in many cases and the E services. It'll be a Click to agree which you've already clicked to agree on.

Uhm contract in place search is still a paper contract paper digital contract now.

Since we don't have wet signatures anymore. Thank you covid but we are hoping to move to a Click to agree for the contractor plate search as well as well as the abandoned vehicle reporting.

Anybody else who gets the data.

Another person, a recipient an agent.

That kind of thing I uh another sub recipient, you should be getting a contract from the from the entity
that you’re getting the data from that is a requirement that we have that as the data gets cast deck Cascades down.

Dunn, Debra (DOL)
Whoever we get the contract, we give the data to they have a contract with us. If they gave the data to somebody. They have a contract with that person if they gave the data to somebody else.

Dunn, Debra (DOL)
Then there’s a contract there. There are some exceptions to that, so for example.

Dunn, Debra (DOL)
Uhm before CDL drivers and acronym case you’re not familiar with it commercial drivers license CDL.

Dunn, Debra (DOL)
Uh hum.

Dunn, Debra (DOL)
Uh you know if someone is employer is sharing.

Dunn, Debra (DOL)
The driving record with the regulatory bodies, such as FM CSA or US Department of Transportation State Patrol. Whoever that’s allowed that’s not data sharing that’s just following your you know your compliance pieces.

Carol Landwehr (Guest)
Uh.

Carol Landwehr (Guest)
Oh looks like my.

Dunn, Debra (DOL)
My screen somehow in a gateway yes, I'm sorry, let me.

Carol Landwehr (Guest)
Let me share the screen again.

Dunn, Debra (DOL)
Sorry about that.
Carol Landwehr (Guest)
Well.

Carol Landwehr (Guest)
And James can you see that?

Dunn, Debra (DOL)
Uh yeah, I can.

Messer, James (DOL)
Our plan OK somehow I lost it.

Dunn, Debra (DOL)
Again.

Dunn, Debra (DOL)
Uh still still yet another question for those who could not attend the webinar. When would the video be
available to see a man I would imagine next week.

Dunn, Debra (DOL)
Uhm.

Carol Landwehr (Guest)
I uh we would ask that.

Dunn, Debra (DOL)
You request that we don’t have a place to post it right now, so if you want to get a copy of the video or
both videos.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
From both webinars, please email our group box data contracts at DL dot log.gov and we'll get that for
you as soon as I'm available.
Carol Landwehr (Guest)
OK, James.

Dunn, Debra (DOL)
Go ahead and take it away.

Dunn, Debra (DOL)
Sure, thanks Debbie so just want to start.

Messer, James (DOL)
Blocked by uh you’re telling everybody that we do appreciate all the comments and questions today.

Messer, James (DOL)
Uh we want to conclude this meeting by talking about next steps in the process.

Messer, James (DOL)
And so we are requesting all feedback you received by close of business on March 4th.

Messer, James (DOL)
R 4, Bolt contract customers. Please send your feedback to data contracts at DL dot wah.gov and 4. East service customers send repeat back to data services at DL dot.gov.

Messer, James (DOL)
The deal will be uh will review all feedback and make any applicable changes to the documents once all feedback has been received we will go ahead and develop and distribute an FAQ.

Messer, James (DOL)
For the Washington administrative code.

Messer, James (DOL)
There is a 3 phase process for rulemaking we are currently finishing up.

Messer, James (DOL)
CR 101 or phase one of the rulemaking process, which is to invite the public to participate in discussion of possible rulemaking before any formal notice or action is taken will be moving into CR 102, which is the proposal of rulemaking.
Messer, James (DOL)
In CR, one or 2 now we will be holding a public hearing and will notify you a minimum of 20 days in advance of the public hearing and do encourage you to participate in that.

Messer, James (DOL)
Once we have completed this phase. We will move into CR 103, which is rulemaking adoption after the rule is approved, the rules filed with the office of the code reviser to be put into affect our goal is to have the new Washington administrative code adopted for a November first effective date.

Carol Landwehr (Guest)
As for contracts will be record.

Messer, James (DOL)
Acquiring new applications, which must be updated and complete we will notify you when we're ready to begin accepting applications, which we anticipate will be sometime in spring.

Messer, James (DOL)
The application will be processed on a first come first serve basis.

Messer, James (DOL)
If an application is incomplete. It'll be sent back for Corrections. We will begin issuing new contracts this summer with an effective date of November, first 2022.

Messer, James (DOL)
After hearing the overview of the draft contracts and Wack and listening to other feedback. You may have additional questions or concerns. Which we do invite you to attend our second webinar scheduled for tomorrow 9:30 to 11:00 AM Pacific Time.

Messer, James (DOL)
Right uh but we do want to thank you. All for taking the time to be here today and we appreciate any feedback that you provided.

Carol Landwehr (Guest)
James I see a question.

Dunn, Debra (DOL)
Ah.
Dunn, Debra (DOL)
From Sean what is Phase 2 is at Sean could you clarify that that was?

Dunn, Debra (DOL)
James already covered data, which which Phase 2 or you.

Carol Landwehr (Guest)
That's that's I think they're talking about the CR one of.

Messer, James (DOL)
2 Phase 2, the public hearing.

Carol Landwehr (Guest)
Great.

Carol Landwehr (Guest)
Yeah, so that's a public hearing will give you.

Dunn, Debra (DOL)
Will give everybody notice for that? Yeah, OK good that was the WAC process. Thank you.

Dunn, Debra (DOL)
OK, thank you everyone.

Dunn, Debra (DOL)
And once again. Thank you so much for participating in this.

Dunn, Debra (DOL)
Uh process, UM, I'm really happy to see that you guys are engaged and.

Dunn, Debra (DOL)
Uhm.

Dunn, Debra (DOL)
And have questions about this that will this will really help us make both the lack and the contract template a better better things for us all to have to live by so.
Dunn, Debra (DOL)
Uh if I see you tomorrow. I'll see you tomorrow. Otherwise, we'll keep you posted on how we go through this process.

Dunn, Debra (DOL)
Thank you very much.

Dunn, Debra (DOL)
Hey question came in.

Dunn, Debra (DOL)
Yes, yes, yes, there is a question about.

Shields, Eric (DOL)
Cannot make tomorrow's session and with that recording be available.

Shields, Eric (DOL)
Yes, my suggestion is the answer is yes, just please. When you request. A copy of today's make sure you note that you wanna copy of the second one as well.

Shields, Eric (DOL)
Yes, which which date.

Dunn, Debra (DOL)
Thanks.

Dunn, Debra (DOL)
No for one or the other.

Dunn, Debra (DOL)
OK, thank you. Thank you bye bye.