



May 14, 2026

Senate Budget Subcommittee #5
Legislative Office Building
1020 N Street, #502
Sacramento CA 95814

Members: Hon. Laura Richardson, Hon. Maria Elena Durazo, Hon. Kelley Seyarto

cc: Eunice Roh

Assembly Budget Subcommittee #4
Legislative Office Building – Swing Space
1021 O Street, #8230
Sacramento, CA 95814

Members: Hon. Steve Bennett, Hon. Damon Connolly, Hon. James Gallagher, Hon. Tom Lackey,
Hon Cottie Petrie-Norris, Hon. Chris Rogers,

cc: Shy Forbes

Re: Department of Motor Vehicles – State to State Vehicle Information Sharing System Upload

Oakland Privacy writes to express great concern regarding the proposed IT project to upload the states drivers license information and driving history records into the AAMVA state to state sharing system for the purposes of Real ID compliance.

Oakland Privacy is a citizen's coalition that works regionally to defend the right to privacy, enhance public transparency, and increase oversight of law enforcement, particularly regarding the use of surveillance techniques and equipment. We were instrumental in the creation of the first standing municipal citizens' privacy advisory commission in the City of Oakland, and we have engaged in privacy enhancing legislative efforts with several Northern California cities and regional entities. As experts on municipal privacy reform, we have written use policies and impact reports for a variety of surveillance technologies, conducted research and investigations, and developed frameworks for the implementation of equipment with respect for civil rights, privacy protections and community control. We occasionally weigh in on bills that have significant impacts on human and civil rights in California.

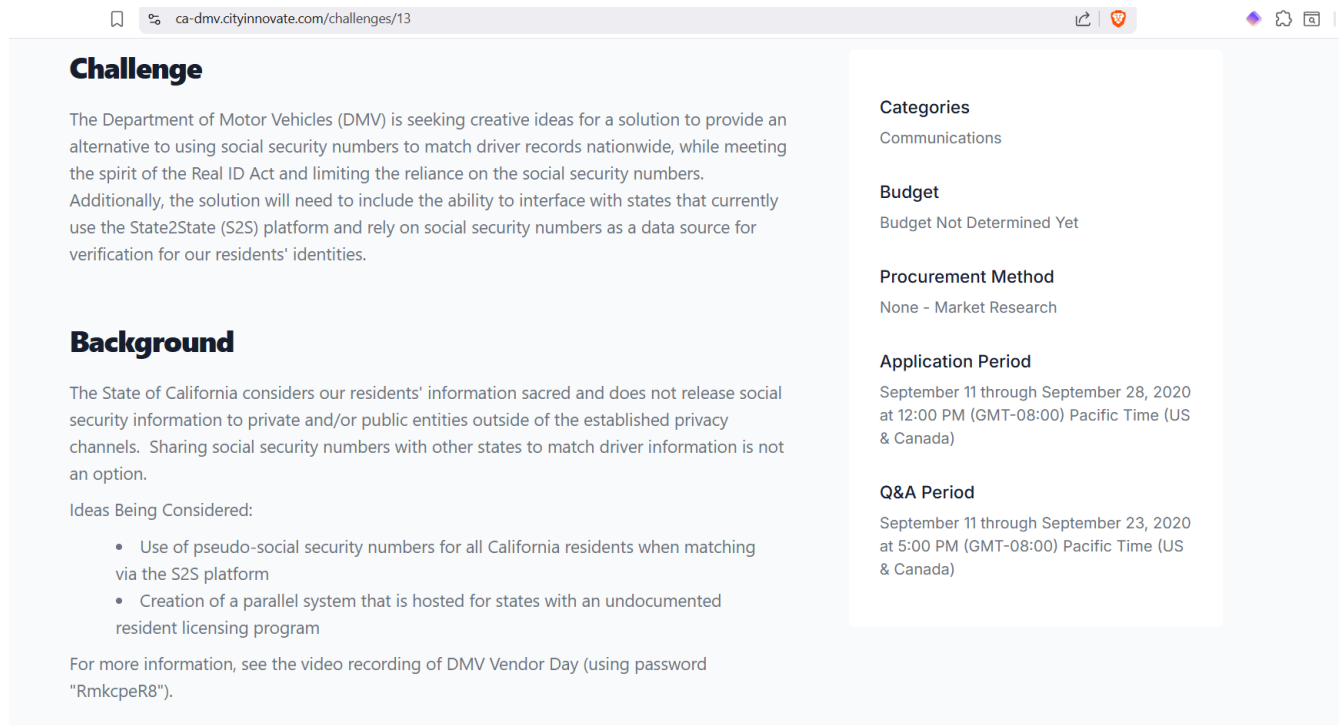
After doing extensive research on this matter, we regret to have to say that we do not believe this process will be safe for California's approximately 1,200,000 AB 60 license holders, and is likely unsafe for many other Californians as well. We would love to accept Chair Bennett's offer and

provide to you guardrails and safeguards that could be implemented to improve safety and protect people, but unfortunately for the reasons we will outline below, we don't know how to do that because the AAMVA database is inherently unsafe under the current conditions.

This does not seem to be only our opinion. While investigating how this system works, we came upon the following: an RFP of sorts from the California Department of Vehicles dated 2020 asking for alternative solutions that would allow the state to verify drivers license information without using the AAMVA state to state system. The page can be seen here:

<https://ca-dmv.cityinnovate.com/challenges/13>

A screenshot is below:



The screenshot shows a web browser window with the URL ca-dmv.cityinnovate.com/challenges/13. The page content is as follows:

Challenge

The Department of Motor Vehicles (DMV) is seeking creative ideas for a solution to provide an alternative to using social security numbers to match driver records nationwide, while meeting the spirit of the Real ID Act and limiting the reliance on the social security numbers. Additionally, the solution will need to include the ability to interface with states that currently use the State2State (S2S) platform and rely on social security numbers as a data source for verification for our residents' identities.

Background

The State of California considers our residents' information sacred and does not release social security information to private and/or public entities outside of the established privacy channels. Sharing social security numbers with other states to match driver information is not an option.

Ideas Being Considered:

- Use of pseudo-social security numbers for all California residents when matching via the S2S platform
- Creation of a parallel system that is hosted for states with an undocumented resident licensing program

For more information, see the video recording of DMV Vendor Day (using password "RmkcpeR8").

Categories
Communications

Budget
Budget Not Determined Yet

Procurement Method
None - Market Research

Application Period
September 11 through September 28, 2020 at 12:00 PM (GMT-08:00) Pacific Time (US & Canada)

Q&A Period
September 11 through September 23, 2020 at 5:00 PM (GMT-08:00) Pacific Time (US & Canada)

It is our belief that if the CA Department of Vehicles was as certain as they currently sound that the AAMVA State to State Sharing System was safe and benign, then there would be little reason for this page to exist. We will repeat from the RFP – “Sharing social security numbers with other states to match driver information is not an option”.

In watching the budgetary presentations in both committees, the state to state system, the SPEXS database where it is housed, and AAMVA the nonprofit organization have largely been described as state-level entities performing only this one function with extensive firewalls against federal access.

Functionally, that is not true. AAMVA operates multiple, at least half a dozen, verification programs for state departments of motor vehicles using SPEXS/AAMVAnet and many of them directly intersect with federal agencies and federal databases within AAMVA's database. What separates the internal sections is nothing more than internal database firewalls, whose relative strength and access requirements are internal AAMVA policies that California does not control and IT technology whose security we have no ability to assess.

While you can peruse the list here: <https://www.aamva.org/technology/systems/verification-systems>
We are going to take the time to describe these verification systems running on the same database architecture as the State to State Vehicle Sharing System.

HAVV – Help America Vote Verification. Service that facilitates a jurisdiction motor vehicle agency to verify voter registration and identity information with **Social Security Administration** records. 45 states participate, including California.

SSOLV – Social Security Online Verification System. Service that facilitates government agencies to efficiently verify social security numbers with the U.S. **Social Security Administration** either online or in batch. 49 states participate, including California.

SSR - Selective Service Registration. Service that automates transmission of information on **Selective Service System** eligible males who apply for or review their driver's license, driver's permit, or identification card 9 states participate, California does not.

USPVS – US Passport Verification Service. Service that facilitates a jurisdiction to verify U.S. passport information presented by an applicant with **Department of Homeland Security** passport records.48 states participate, including California.

VLS – Verification of Lawful Status. Service that facilitates a jurisdiction motor vehicle agency to verify an applicant's **lawful status** prior to issuing a state-issued driver's license or identification card. Since this one is directly relevant to the current concerns, here is more specific language about this AAMVA verification service.

Immigration documents are verified by the Department of Homeland Security (DHS) Systematic Alien Verification for Entitlements (SAVE) program. SAVE allows the MVA to verify that the presented documents match the electronic record of the documents held by the DHS and with a means to comply with REAL ID regulations. MVAs can interface with SAVE using:

- A ***DHS interface to SAVE***
- Verification of Lawful Status (VLS), which allows the transactions to be integrated with other transactions passed through AAMVA***
- A combination of VLS and SAVE, such as using VLS for Initial Verification transactions and using DHS for additional Secondary and Tertiary Verifications***

20 states participate, California does not. The list of participating states that use AAMVA to verify citizenship status include Nevada, New Mexico, Texas, South Dakota, Nebraska, Iowa, Wisconsin, Indiana, Tennessee, Mississippi, Florida, North Carolina, New Jersey, Connecticut, Rhode Island and New Hampshire, Alaska, and Hawaii.

So to be clear, 40% of the state motor vehicle administrations with which California would be sharing its AB 60 license holder information can integrate citizenship checks through DHS Systemic Alien Verification with their other transactions passing through AAMVA.

A visualization of the SPEXS/AAMVAnet database is included below. It is a hub and spoke system with numerous federal agencies on the various spokes including DHS. If VLS activity can be integrated with other transactions passed through the AAMVA hub, as AAMVA clearly states is the case, there is a problem.

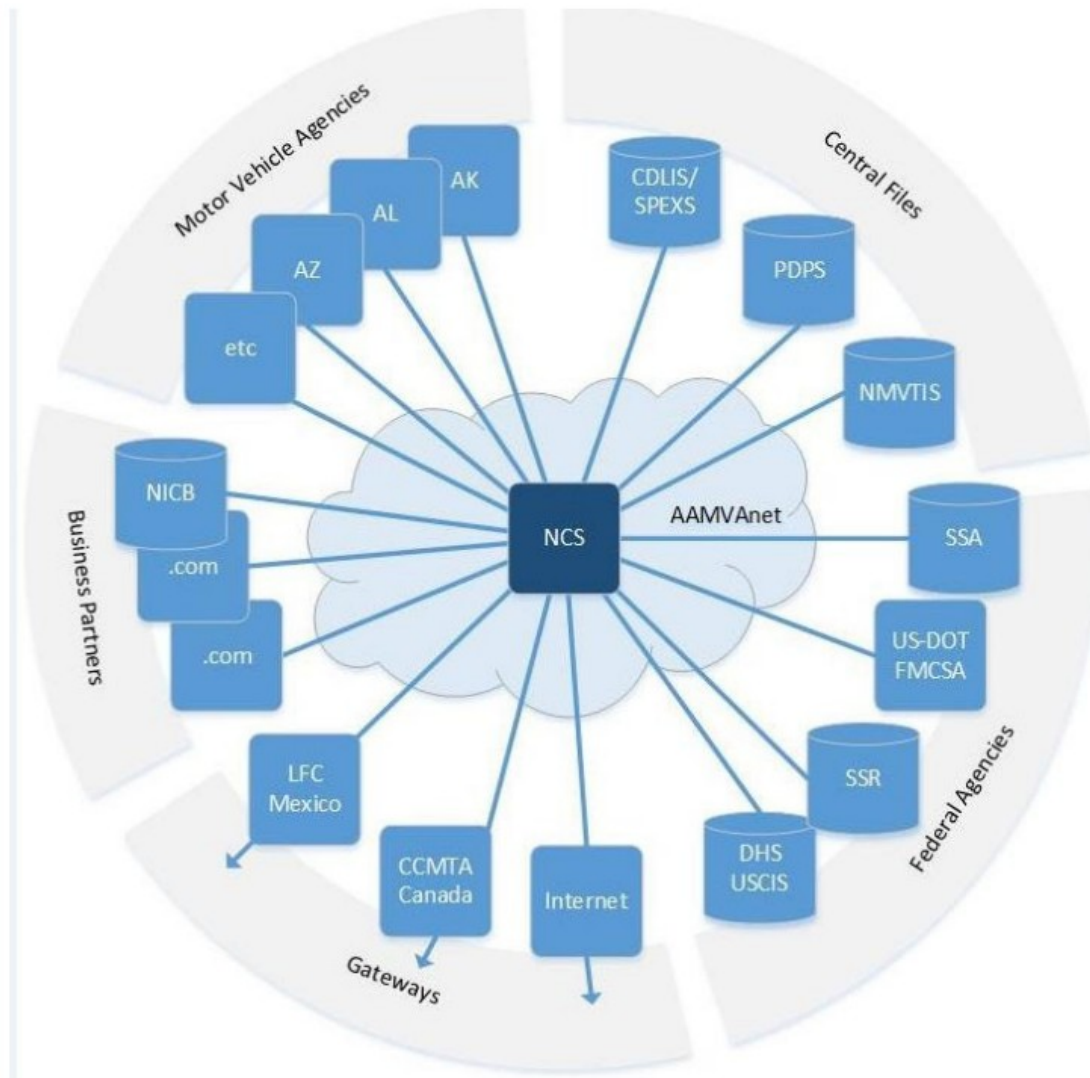


Diagram: Architecture of connections between AAMVA's central site, including the SPEXS database, and state, Federal, and private entities. From "AAMVA SPEXS Master

We regret that we cannot suggest what California can do to mitigate this problem. Our entire goal in our legislative advocacy is to provide exactly those kinds of suggestions to the Legislature. It is possible that in other times, California could have depended on general goodwill from federal agencies, and federal immigration priorities that focused on violent offenders not working people, but it is manifestly clear that in 2026, we cannot.

As Assembly member Chris Rogers pointed out, we have very little knowledge if individuals have already been arrested, detained and deported with the help of AAMVA, because how would we know if VLS was used by a motor vehicle administrator in another state to effectuate an arrest. For example, Minnesota issues drivers licenses to undocumented individuals and participates in the STS system. And a lot of people were located and arrested in Minnesota.

We fully understand that it would be greatly inconvenient to Californians should the state delay the upload until federal immigration returns to normal conduct under a non-rogue federal administration, if DHS should choose to declare California non-compliant with Real ID and stop accepting the state's licenses for aviation and federal entry. Which is a discretionary decision on the part of the federal government. But having one's family ripped apart because a person needs to drive in order to hold down a job is worse than inconvenient. It is cruel.

The Department of Motor Vehicles seems to have recognized 6 years ago that this system was not safe for Californians and sought an alternative. It is not their fault that there are no good alternatives. But we think the state must be realistic about the dangers and not pretend that they do not exist.

As has already been pointed out many times, AAMVA would not necessarily even be able to notify California if they simply received a subpoena or court order directly from the federal government with a gag order for a bulk download of all California drivers licenses with a social security number of 99999, as the AB 60 licenses will be coded. AAMVA concedes this point by saying they would notify California **if legally permitted to do so**. In an administration that has already stolen CA's Medi-Cal data, has attempted to get SNAP/CalFresh data, and downloaded IRS and SS information to DOGE, there is very little reason not to expect this to happen.

We can only recommend to both committees that California delay this upload.

Respectfully,

Tracy Rosenberg

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