



**HUMAN PERFORMANCE FACTORS ATTACHEMENT**

**RMV Email Update**

**Randolph, NH**

**HWY19MH010**

(5 pages)

**From:** [Bragg Kenneth](#)  
**To:** [Becic Ensar](#); [Collins Dennis](#)  
**Subject:** FW: Randolph, NH Crash Investigation  
**Date:** Tuesday, May 26, 2020 12:21:44 PM  
**Attachments:** [image001.png](#)

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**From:** Norman, Joanne (DOT) [REDACTED]  
**Sent:** Thursday, May 21, 2020 12:53 PM  
**To:** Bragg Kenneth [REDACTED]  
**Subject:** Re: Randolph, NH Crash Investigation

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Mr. Bragg,

Thank you for this opportunity to update you on the measures undertaken by the Massachusetts Department of Transportation (“MassDOT”) and Registry of Motor Vehicles (“RMV”) since the unfortunate, well-publicized events last summer in New Hampshire.

As you know, a new Interim Registrar was appointed to lead the RMV with the direction to begin both internal and external organizational reviews with respect to lapses in state-to-state communications and data sharing concerning violations by Massachusetts licensed drivers, along with other necessary agency improvements. Grant Thornton was retained by the RMV to conduct this independent, external review and make various recommendations which were included in its summary report.

The Interim Registrar and Grant Thornton reached many similar conclusions about the need to improve internal processes, hire additional staff, and reorient and reprioritize the RMV’s critical public safety responsibilities.

One of those mutually identified improvements was for the RMV to enhance its procedures by hiring a Chief Compliance Officer, tasking that person with conducting an enterprise-wide risk analysis. On September 30, 2019, I started in the role of Chief Compliance Officer and began conducting such an analysis.

Below, I am providing you a summary of the RMV’s progress in addressing the public safety risks and potential risks identified by Grant Thornton, including:

- Untimely processing of in-state and out-of-state data impacting driving privileges of Class D and CDL license holders
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

**Untimely processing of in-state and out-of-state data impacting driving privileges of**

**Class D and CDL license holders**

As you are aware, a primary finding of both Grant Thornton and the Interim Registrar were the RMV’s need to establish clear lines of responsibility and accountability for the processing of out-of-state paper violation notices and other public safety functions. The RMV has employed a Deputy Registrar for Safety to ensure this focus and to oversee the RMV’s newly created Out-of-State (“OOS”) Unit, which is responsible for both electronic and paper out-of-state notifications. Daily incoming out-of-state notifications of license suspensions are now being processed timely with immediate suspension impositions, including such future dated out-of-state suspensions and action within one business day for the most serious of offenses warranting suspension. This mitigates the risk that a driver may have a new egregious offense while awaiting the out-of-state suspension to commence and maintaining Massachusetts driving privileges. The OOS unit continues to process the backlog of paper notifications discovered following the New Hampshire accident, and significant progress has been made on that front, with expected completion in the coming months.

With regards to electronic CDLIS notifications, the RMV made several system improvements along those same lines to ensure notices are either acted upon either automatically or assigned and escalated for timely manual review. Further, the RMV’s SPEX unit, which carried responsibility for CDLIS notices, and duplicate record merges, was transferred under the direction of the OOS unit and the Deputy Registrar for Safety, effective March 2020, to fulfil a key Grant Thornton recommendation that all out-of-state notifications be handled uniformly by one team.

As the RMV is unfortunately not alone in the challenges of keeping driver records up to date based on the timeliness of information provided or available to us, we would be remiss to not use this opportunity to continue our advocacy for a national dialogue with regards to supporting interstate efforts to improve and automate the sharing of driver information and public safety on our roadways for non-CDL drivers. While CDLIS has set a strong national precedent for doing so, and the RMV has developed innovative processes and state partnerships that advance this cause, there is clearly more that can be done.

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**Additional Grant Thornton Recommendations:**

**Merit Rating Board**

The RMV’s Merit Rating Board (“MRB”) maintains responsibility for the processing of “in-state” citations from the courts and law enforcement, attaching citations for driving records so that appropriate administrative adjudication and insurance surchargeability occurs.

Internal and external reviews found that the MRB’s governing body of the same name had not been conducting regular oversight meetings of its Directors for many years prior to June 2019, the last meeting before that date being in 2015. Convened by the Interim Registrar, regular public meetings are now occurring and an Interim Director, who has since been appointed permanently, was named last August to provide fresh, new leadership.

These reviews also found the existence of significant in-state citation work queues requiring quality-control review by MRB staff. While Grant Thornton projected it would take upwards of two years to do so, those work queues were closed out in April of 2020, though daily work items will continue to be generated as new citations occur and are sent. The MRB has also made progress in working with the courts and law enforcement to reduce errors and the generation of work items upstream so that fewer require manual review of the quality-control team. The MRB continues to act upon work items generated for more serious offenses within the course of a normal business day.

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