



Driver and Vehicle Services Update Bulletin

Josh Shapiro, Governor

Mike Carroll, Secretary

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PennDOT's Online Agent Direct Scanning

PennDOT is pleased to announce the transition to an Online Agent Direct Scanning process through PennDOT's Online Registration Program. This new process is designed to streamline transaction processing, reduce costs for authorized agents, minimize the need for paper copies, and provide faster electronic access to supporting documentation.

The implementation of electronic document management technology supports PennDOT's efforts to reduce the volume of paper exchanged, improve business efficiency, and comply with state and federal document retention and discovery requirements.

PennDOT has updated **Exhibit B, Program Requirements and Document Scanning and Imaging Supplemental Agent Service Business Requirements**, within the new **Agent Service Agreement**. This document establishes standards for PennDOT's electronic document management system and processing requirements. The goal is to implement systems that protect customer confidentiality and maintain the integrity of PennDOT business transactions. The new Exhibit B Appendix II is attached to this Bulletin.

Key Changes:

- Authorized Online Agents have the ability scan all supporting documentation as part of each transaction into the Online Program Integrator's system.
- Scanners used for this process must scan documents in **color** at a resolution of **300 DPI**.
- Once scanning is complete, Authorized Agent personnel must retain the original supporting documentation—including proof-of-ownership documents in a secure storage area for **one year** after the title and registration application has been processed.

This update reduces the existing three-year record retention requirement under the agent services agreement to one year for documents that are color scanned through the Authorized Agent's online processing.

Benefits of Direct Scanning:

Benefits of the Online Agent Direct Scanning process is expected to:

- Reduce costs associated with making copies for each transaction.
- Eliminate the expense of mailing original documents to an Integrator's scanning partner.

- Reduce record storage needs by limiting retention of eligible scanned documents to one year.
- Improve processing efficiency and electronic document access.
- Reduce the risk of paperwork with customers' personal identifiable information (PII) being lost during shipment.

Important Retention Requirements:

Agents must continue to retain copies of transactions that have **not been processed online** per the agent service agreement for **three years**. There is also additional information concerning this requirement within Exhibit B, Appendix II, Document Scanning and Imaging Supplemental Agent Services Business Requirements attached.

All transactions processed manual or online prior to online direct scanning must also be retained for three years. In addition, Authorized Agents must retain reconstructed transactions at their business location and mail original documents to PennDOT as required under current procedures until further notice.

For agents authorized to process reconstructed transactions through the Online Registration Program:

1. Scan the documents during processing.
2. Make copies of the documents for your records.
3. Mail the original reconstruction paperwork directly to:
PennDOT Bureau of Motor Vehicles, Special Services Unit
1101 S Front St, 3rd Floor, Harrisburg, PA 17104

PennDOT will provide updated guidance if these reconstruction requirements change.

Implementation Schedule:

Effective **November 1, 2026**, any new online agents with a new agent services agreement will be required to use online agent direct scanning with 300 DPI color scanning, per the new Exhibit B Appendix II is attached to this Bulletin.

Effective **November 16, 2026**, existing agents may voluntarily begin using Online Agent Direct Scanning with 300 DPI color scanning. Please contact your existing Online Program Integrator to obtain access to Online Agent Direct Scanning.

Effective **July 1, 2027**, Online Agent Direct Scanning will become mandatory for all online agents. Please contact your existing Online Program Integrator to obtain access to Online Agent Direct Scanning.

For questions regarding this new Online Agent Direct Scanning, please contact your current Integrator. You may also contact PennDOT through the ORLP Resource Account. RA-PDOLRP@pa.gov.

Exhibit B

APPENDIX II

Commonwealth of Pennsylvania

Department of Transportation

**Document Scanning and Imaging
Supplemental Agent Services Business
Requirements**

Exhibit B
Appendix II

Electronic Document Management Requirements and Standards

Contents

1. General Information

- 1.1 Background
- 1.2 Document Scanning and Imaging, Scanning and Security Requirements
for Authorized Agent Services
- 1.3 Use of PennDOT Customer Documents and Information
- 1.4 Security
- 1.5 Incident Reporting
- 1.6 Agent Requirements, Records Retention and Quality Control

1. General Information

1.1 Background

The need for electronic document management technology stems from the need to reduce the volume of paper exchanged, improve business efficiency, and to comply with State and Federal laws for document retention and discovery. This document outlines standards for PennDOT's electronic document management system and processing requirements. The Intent is to implement systems that ensure the confidentiality of our customers and the integrity of our business transactions.

The Intent is to implement systems that ensure the confidentiality of our customers and the integrity of our business transactions. This exhibit is only for agents who are approved online agents through the Online Registration Program ("Authorized Agent").

In addition, PennDOT only allows PennDOT authorized third-party qualified service providers who (a) establish and maintain a direct, secure connection to PennDOT's Motor Vehicle & Driver License (MVDLS) system for the submission, processing, and receipt of motor vehicle related transactions and data, and (b) provides and manages electronic document imaging and PennDOT authorized agent scanning service ("Online Program Integrators") to provide imaging and electronic document storage. PennDOT may update these requirements periodically in the future. Online Program Integrators must have executed an Integrator agreement with PennDOT.

1.2 Document Scanning and Imaging, Scanning and Security Requirements for PennDOT Authorized Online Agent Services

Image retention and physical document retention rules are a critical part of the agent process and agreement with PennDOT. PennDOT moved from a central scanning process through its Online Program Integrators to an Authorized Agent scanning process. All online Authorized Agents shall scan the required supporting documentation and paperwork into the Online Program Integrators system as part of the title or registration transactions process. Only the authorized PennDOT Online Program Integrators, which can be found on PennDOT website at <https://www.pa.gov/services/dmv/apply-to-penn-dot-olrp.html>, can provide the scanning and imaging management system for online agents.

This Exhibit B, Appendix II, replaces the prior Agent Service Agreement template's Exhibit B, Document Imaging system Requirements and Exhibit A, Document Imaging Supplemental Business Requirements. Any non-online Authorized Agent shall discontinue the use of any un-approved providing electronic storage effective when the new agent services agreement is executed.

1.3 Use of PennDOT Customer Documents and Information

Authorized Agents shall make no use of PennDOT customer documents or its information, nor shall they provide the customer documents or information (or any portion of the documents or information) to any entity other than a PennDOT authorized representative, except as authorized by PennDOT.

No Authorized Agent shall use, sell, license, or otherwise transfer or impart to any person, firm, corporation or other entity, any information obtained from the documents, including listings of individuals, for any reason. Information obtained through such access is subject to the restrictions upon use and dissemination imposed by the Federal Driver Privacy Protection Act (DPPA) and any other Pennsylvania or Federal statute, laws, rules or regulations relating to the privacy of Personally Identifiable Information (PII).

1.4 Security

Protecting the data of our customers is of the utmost importance to PennDOT. All Authorized Agent personnel having access to PennDOT customer documents and information shall comply with Agent Services contractual requirements. The Authorized Agent shall not hold or place PennDOT customer documents, images, records or information in any area accessible to unauthorized personnel at any time.

The Authorized Agent shall report any suspected or actual breach, leakage, or unauthorized access of PennDOT data to PennDOT immediately upon discovery. The full details of the incident must be communicated to the PennDOT Program Manager.

The Authorized Agent shall keep all original documents, including proof of ownership documents, in the Authorized Agent's secure storage room at all times. If at any time, during a site inspection, PennDOT finds any original documents not being securely stored in the Authorized Agent's approved secure storage room may result in suspension, termination or revocation of the Agent Service Agreement / certificate of authorization.

1.5 Incident Reporting:

Upon the Authorized Agent's receipt of a report or information of any kind which indicates real or suspected data compromise, data loss, theft, or fraudulent or improper use of equipment, materials or information in the possession or control of the Authorized Agent or their imaging Provider, the Authorized Agent shall immediately notify the PennDOT Program Manager by telephone. Additional reporting and notifications must comply with the PennDOT Agent Service contract as well as Commonwealth ITB-SEC024 - IT Security Incident Reporting Policy.

Authorized Agents shall forward to PennDOT the following Personally Identifiable Information (PII) related to personnel suspected of fraudulent or improper use of equipment, materials or information and shall secure as required by law:

- o Name(s)
- o Address(es)
- o A list of all times at which the personnel had been or will be scheduled to perform their job duties

- o Names, addresses, and telephone numbers of their direct supervisor
- o A description of the nature of the suspected fraudulent or Improper activity
- o A statement of the manner in which the Authorized Agent gained knowledge of the alleged fraudulent or improper activity
- o The names, addresses, and telephone numbers of all informants and other persons having knowledge of the alleged fraudulent or improper activity
- o Copies of all the reports, logs or other information which could document, clarify or in any manner assist in the investigation.

Physical Intrusion:

In the event of any Incident of a break-in, theft, fire or vandalism, the Authorized Agent shall immediately notify the appropriate law enforcement officials and provide a copy of the applicable police report to PennDOT within 10 days. The PennDOT Program Manager shall also be notified immediately in the event of any incident of a break-In, theft, fire or vandalism by telephone and in writing, within 24 hours, a detailed account of the incident and shall comply with the Agent Service contract as well as the Commonwealth ITB-SEC024 - IT Security Incident Reporting Policy.

1.7 Agent Requirements, Records Retention and Quality Control

Agent Scanning Requirements and Retention:

The Authorized Agent shall scan all supporting documentation for each transaction into the Online Program Integrator's system. The scanners must scan in color and scan at 300 DPI. After the scanning is complete, the Authorized Agent personnel shall maintain the original supporting documentation, including the proof of ownership document, in the Authorized Agent's secured storage area for one year after completion or processing the application for title and registration and all supporting documents.

The Authorized Agent shall check all imaged documents to confirm images are clear, legible, and free of distortion (image quality). If at any time the PennDOT approved Online Program Integrator advises the Authorized Agent the quality or documents are missing for the scanned image, the Authorized Agent shall pull the original documents, re-scan, and submit back to the PennDOT approved integrator within five days of the request.

The Authorized Agent shall keep **all original documents**, including the proof of ownership document (certificate of title or salvage) at the Authorized Agents' location for one year.

PennDOT approved Authorized Agents shall keep the original documents for one year at the Authorized Agent's location, but are no longer required to keep the supporting documents for an additional two years for electronic

copies.

- The Authorized Agent shall maintain the original paperwork and proof of ownership documents for one year after processing the transactions of the customers application.
- All supporting documents must be scanned into the Online Program Integrator's system as part of the transaction.
- The Authorized Agent shall check all imaged documents to confirm images are clear, legible and free of distortion (image quality). If there is an issue with the scanned images, the Authorized Agent shall scan those items again.
- This exhibit reduces the 3-year record retention requirements under Title 67 Pa Code §43.5(f)(3), to one-year for all color scanned documents through the Authorized Agents processing.
- **Please Note:** The Authorized Agent shall retain copies of any transaction not processed online for three years per exhibit B, Appendix A, Agent Services Program requirements, attached to your Agent Services Agreement.
- The Authorized Agent shall keep reconstructed transactions at the Authorized Agent's location and shall mail the originals to PennDOT. If you are authorized to process reconstructed transactions through Online Registration Program, you would scan the documents during processing, make copies and mail that reconstruction paperwork direct to PennDOT at Bureau of Motor Vehicles Special Service Unit PO BOX C69007 Harrisburg, PA 17106-9007. PennDOT will update this section if this requirement changes.

Audits:

PennDOT shall continue to conduct administrative audits of Authorized Agent transactions and supporting documentation and may request to review the original documents that are held for one year at the Authorized Agent's location. The Authorized Agent shall provide access to the original documents to a PennDOT representative to be reviewed during the audit process to ensure the Authorized Agent is in compliance with all applicable policies, processes, requirements, and law.

Retention and Destruction of Paperwork:

After one year following the date each transaction was processed, the Authorized Agent shall destroy the documents, including the proof of ownership documents.

Authorized Agents shall perform a record retention timeline review for the one-year original document retention.