TeleSeal Remote Online Notarization (RON) Standard Operating Procedure (SOP)

Version: 1.0
Effective Date: 2025-07-27
Review Cycle: Annual
Owner: Head of Operations

---

1. Purpose

This SOP defines the step-by-step workflow for conducting Remote Online Notarizations (RON) in Arizona, fully compliant with A.R.S. Title 2, Chapter 12, Article 13. It covers session setup, identity proofing, document handling, signing, sealing, journaling, and recording.

2. Scope

Applies to all TeleSeal-commissioned notaries, internal staff coordinating RON sessions, and technical systems (Authenticate.com, Twilio, AWS, PDF/X.509 signing).

3. Roles & Responsibilities

Role	Responsibility
Notary	Conduct RON session per this SOP; sign & seal
Session Host	Schedule session; prepare documents; monitor AV
Tech Support	Ensure platform availability & troubleshoot
Compliance	Audit recordings, journals, and adherence

---

4. Pre-Session Preparation

1. **Session Scheduling**
   - Client or staff books via `TeleSeal` portal.

   - Confirm client email & appointment time; send "Join Session" link.
2. **Document Intake & Validation**
   - Client uploads PDF(s) to secure portal.

   - Verify PDF format, ensure fillable fields for signature/seal.

   - Store upload metadata in confidential database.
3. **Notary Onboarding Verification**
   - Confirm notary's commission is valid in Arizona.

   - Ensure notary has Teleseal-provisioned hardware token for X.509 in-browser signing.

---

5. Session Initiation

1. **Authenticate User & Notary**

- Client clicks "Join Session" → Twilio Video room launches.

  - Notary joins; both parties authenticate to platform with MFA.
2. **Identity Proofing (Authenticate.com)**
   - **Credential Analysis:** Client uploads government ID images.

   - **Liveness Check:** Face match plus anti-spoofing.

   - If identity proof fails:
     – Offer **Knowledge-Based Questions (KBA)** fallback (5-question quiz).

     – If KBA fails, offer **Credible Witness** (per A.R.S. § 2-12-1305).
3. **Session Record Start**
   - Automatically begin A/V recording (encrypted Twilio HLS).

   - Generate unique session ID; display on screen for audit.

---

6. Document & Signing Workflow

1. **Document Control**
   - Load PDF in in-browser viewer.

   - Restrict client navigation to current page; disabled print/download.
2. **Signing Events Tracking**
   - Capture "click" events when client places signature or initials.

   - Log timestamps, page numbers, field names in the electronic journal.
3. **Notary Certificate & Seal**
   - Notary completes statutory text via template (R2-12-1307).

   - Platform inserts certificate block at designated location.

   - Notary applies digital seal using user-provided X.509 certificate:
     – Private key operation occurs client-side (in-browser HSM or token).

     – Public certificate metadata stored with document.

---

7. Journaling & Recording

1. **Electronic Journal Entry**
   - For each act (identity proof, signing event, seal application), record:
     – Date/time (UTC)

     – Session ID & participant IDs

     – IP addresses, device info

   - Journal stored in tamper-evident AWS RDS (AES-256 + Object Lock).
2. **Audio-Video Recording**
   - Store raw and segmented recordings in AWS S3 (SSE-KMS).

- After 30 days move to Glacier Deep Archive (Immutable lock for 5 years).

---

8. Session Closure

1. **Client Confirmation**
   - Notary asks client to review final PDF.

   - Client verbally confirms acceptance; Notary logs confirmation.
2. **Stop Recording & Export**
   - Terminate Twilio stream; consolidate A/V files.

   - Generate final signed PDF; store in S3 and make available for client download.
3. **Finalize Journal**
   - Complete outstanding journal entries.

   - Lock journal record; no further edits permitted.

---

9. Post-Session Actions

1. **Quality Review**
   - Compliance team reviews random sessions monthly for adherence.

   - Check identity proof logs, A/V clarity, journal completeness.
2. **Client Delivery & Notifications**
   - Email client: link to final PDF and journal summary.

   - Send notary copy of journal entry via secure internal portal.
3. **Retention & Disposal**
   - Maintain records per Data Retention Policy (minimum 5 years).

   - After retention period, purge in accordance with Object Lock and Disposal SOP.

---

10. Exceptions & Escalations

- **Technical Failures:** If Twilio session fails, switch to backup WebRTC channel; log incident.

- **ID Proof Failures:** Refer client to in-person notarization or credible witness process.

- **Policy Deviations:** Notaries must escalate to Compliance immediately and document rationale.

---

11. References

- Arizona RON Rules: A.R.S. Title 2, Ch. 12, Art. 13

- TeleSeal Policies: Information Security, Access Control, Data Retention

---

End of RON SOP