

CALIFORNIA

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
<p>Introduce Full Legal Name into Driver Licensing System (in Record, on Document).</p>	<p>California already uses the name on official documentation (e.g., birth certificate, court name change, marriage certificate) as defined in California Regulations for True Full Name.</p> <p>Major, if minimum name field requirements are established. (e.g., 125 character name field as required by the DLA).</p>	<p>The requirements for true full name will match our current regulations, and the requirements for the length of the name(s) are not specified by regulation.</p>
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> 37. Full Legal Name 38. Person's Date of Birth 39. Person's Gender 40. Person's DL or ID Card Number 41. Digital Photograph of Person (and retention) 42. Person's Address of Principle Residence 43. Person's Signature 44. Physical Security Features to prevent tampering, counterfeiting or duplication 	<p>Potentially minimal, as DL/ID card currently contains all items.</p> <p>If required by regulation to verify address through presentation of documents during the application process (e.g., Utility bill), there will be a personnel impact.</p> <p>If the requirement necessitates verification of the address by a third party system there will be a need for California Regulations and increased costs.</p>	<p>Assumption is that security features and machine-readable requirements will be similar to existing feature technology.</p>

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45. Common Machine Readable Technology		
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year).	Costs for personnel and IT programming changes (for renewal applicants).	California previously tied the expiration date of the DL/ID card to the expiration date on the legal presence document for original applications only. Stopped this process in 1999. Will re-implement for original applicants in August 2005. Renewals will require changes to California Statute.
Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date.	Minimal.	Have a process in place that allows us to issue a DL/ID card (“temporary document”) for a period less than the regular card term. There will be IT costs associated with applying this process and programming for renewal applicants (see above).
<p>Verification at Source: Enabling your system to electronically verify documentation with:</p> <ol style="list-style-type: none"> 1. SSOLV 2. SAVE 3. DEERS (DOD) 4. Other jurisdiction (DL/ID card) 5. Birth certificate 6. Other, i.e., third party vendors 	Major Impact (costs, state law) to electronically verify information with DEERS, Birth Certificate, and third party vendors.	<p>Currently verify electronically with SSOLV, SAVE and use CDLIS/PDPS.</p> <p>Assumes that each state will have a centralized database and/or process for birth document verification, and that DEERS will partner in development with automated verification. Without such a system, the cost to verify documentation is substantial.</p>
Developing access capability to SAVE system.	None for current process and system design (that now applies to original applicants), but there are personnel and IT costs associated with including renewal applicants.	Assume that there will be no changes to the system currently used.
Introduce equipment into system to capture digital images of identity source documents so that images can be retained in electronic storage in a transferable format.	Major Impact.	We do not capture and store this information today. Requires new equipment, possible office layout modifications, major programming, and database development.

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Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years.	Major Impact.	We do not collect this information today. Requires database storage capabilities for at least 25 million records.
Subject each person applying for a driver's license or identification card to mandatory facial image capture.	No impact.	Assumes our current process is acceptable.
Establish an effective procedure to confirm or verify a renewing applicant's information.	Unable to determine. There will be a major impact if the regulation for the verification of identity for renewals establishes a document-based requirement.	Currently, the department processes DL renewals by mail or by internet for customers that have the form we mailed to them. The internet process requires the use of the last four of the SSN and the use of a "PIN Code" that appears on the renewal notice mailed to the applicant. Renewals by Mail are mailed to the address provided to us when the card fee is paid. All other renewals must appear in person. Customers requesting ID cards must appear in person to renew.
In the event that a social security account number is already registered to or associated with another person to which any state has issued a DL/ID card, the state shall resolve the discrepancy and take appropriate action.	To be determined.	California has already been verifying SSNs with SSA. Entire database should be cleansed by the end of 2005 for any cardholders that have a valid DL/ID card. After 2005, if multiples exist on our database for active cardholders, SSA would have to have verified the duplication of the number for both parties. California DMV does not issue a card to any applicant unless the information provided matches SSAs records. SSA acknowledges that there are a few cases where two applicants may legally have the same SSN.
Check other states if a person already was issued a DL in another state.	To be determined.	Assuming AAMVAnet makes programming changes to allow for this information to be passed through CDLIS/PDPS, then the impact would be minor. If the States had to do this without a centralized system, costs would be major.
Ensure physical security of locations where DL/ID cards are produced.	Probable minimal impact.	This assumes that the current process our vendor uses for physical security of the manufacturing plant /materials and background checks meets any regulations promulgated.
Subject all persons' authorized to manufacture or produce DL/ID cards to appropriate security	Unable to determine. It is unclear what "producing cards" or "appropriate	If the goal is to ensure that our vendor employees and the states' field office technicians have had fingerprint checks prior to employment, we believe we are compliant. A full "security clearance" regulation could far exceed fingerprint

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clearance requirements.	security clearance” mean.	checks and increase costs.
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards.	Minimal Impact.	We already have fraud document training. Assume that we would just be required to update our training.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years.	Major impact for identification cards.	This requires that we change state law for the term on our Senior ID cards (currently 10 years). This would require that these applicants would appear more often in our field offices.
Alternative document design if it does not meet federal standard.	Possibly minimal impact.	Requires programming for our database, along with programming and physical card changes with our card vendor. Assume Feds do not specify document design.
Legal Presence Requirement.	Possibly minimal impact.	California has required legal presence since 1994. Assume that the documents we currently accept as proof of legal presence are the documents; we would be required to accept under regulation.

Provide electronic access to all other states to information contained in the motor vehicle database of the state.	Unknown.	California currently allows other states information as specified in state law (medical info/addresses are confidential). Assume that if this is coordinated through AAMVAnet, overall impact will be less.
Maintain a state motor vehicle database that contains at a minimum: <ul style="list-style-type: none"> ▪ All data fields printed on DL/ID cards. ▪ Motor vehicle drivers’ histories, including motor vehicle violations, suspensions and points on licenses. 	No impact.	Assumes that promulgated regulations contain the same types of information we retain today.
Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot	Major impact.	California currently has pending legislation concerning this topic. Governor has stated that he would not sign this into law at this point. Awaiting federal regulations

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What questions does your jurisdiction have as a result of the passing of the Real ID Act?

- If California has already verified all its valid cardholder records with the Social Security Administration and through the use of SAVE, will we be required to re-verify the birth document? (Poses the question... if we match two different federal databases, why should we be required to re-verify birth documents unless SSA is required to re-verify?)
- Is the requirement day forward? If we issued a card in 2007 that expires in 2011, will the Federal Government still accept it until the renewal date or will we be required to process all cardholders prior to 5/2008?
- What is truly meant by “address verification?”
- Will existing cardholders be required to provide an identity/source document to re-verify their identity at the time of *every* renewal?
- How will we verify all identity/source documents when no national system currently exists to support this type of effort?
- What will be requirements to allow for a renewal by mail or renewal by internet program?

If your jurisdiction has done an impact analysis please provide us with a copy of the analysis.