

COLORADO

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>NO IMPACT – Colorado currently captures, and stores in the database, the full legal name and any other names shown on all documents presented for identification.</p>	
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> 46. Full Legal Name 47. Person’s Date of Birth 48. Person’s Gender 49. Person’s DL or ID Card Number 50. Digital Photograph of Person (and retention) 51. Person’s Address of Principle Residence 52. Person’s Signature 53. Physical Security Features to prevent tampering, counterfeiting or duplication 54. Common Machine Readable Technology: 	<ul style="list-style-type: none"> 1. NO IMPACT – Currently in compliance 2. NO IMPACT – Currently in compliance 3. NO IMPACT – Currently in compliance 4. NO IMPACT – Currently in compliance 5. NO IMPACT – Currently in compliance 6. NO IMPACT – Currently in compliance 7. NO IMPACT – Currently in compliance 8. NO IMPACT – Currently in compliance 9. POTENTIAL IMPACT – The current 2D-barcode does not contain the photograph or 	<ul style="list-style-type: none"> 9. If the machine-readable technology (barcode) requirement means to include ALL elements/features from the front of the card, there will be a fiscal impact for the modification of the barcode and for a redesign of the back of the cards to create room for the larger barcode. Clarification required.

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	signature of the cardholder. Real estate on the back of the card is at a premium.	
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	NO IMPACT – Currently in compliance	
Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date	POTENTIAL IMPACT – modification required to ID card processing map in DLS (IT) and to the physical ID card to allow variable text on the back indicating TEMPORARY ONLY.	Fiscal impact from vendor to modify the back of the ID card and legislative impact to allow the text TEMPORARY ONLY on the ID card.
<p>Verification at Source:</p> <p>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 	<ol style="list-style-type: none"> 1. NO IMPACT – Currently in compliance 2. Final stages of implementation 3. Not currently under consideration. 4. NO IMPACT – Currently in compliance 5. Currently, verification consists of contacting the issuing agency by telephone to verify any questionable documents. Items are also faxed to the issuing agency for verification. 6. N/A 	<ol style="list-style-type: none"> 5. Based on new cost-per-query information from NAPHSIS, regarding the Electronic Verification of Vital Events (EVVE) system, Colorado will need to revisit participation. Latest estimates are \$1.28 per query (down from \$5.00 per query), based on the number of queries and number of states participating.
Developing access capability to SAVE system	NO IMPACT – Currently in process.	
Introduce equipment into system to capture digital	POTENTIAL IMPACT – cost of	To comply with the requirement of this item, the cost of scanners, and

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images of identity source documents so that images can be retained in electronic storage in a transferable format	scanners, office procedure changes, programming modifications (vendor and IT). Impact would also be on customer wait times.	potential vendor programming costs, have been proposed as a decision item for section funding.
Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years	POTENTIAL IMPACT – See above item. Currently, only documents used in exception processing are copied and submitted for microfilming.	
Subject each person applying for a driver’s license or identification card to mandatory facial image capture	POTENTIAL IMPACT – Only first-time applicants are subjected to the facial recognition (FR) process. Impact would be on IT for programming and, possibly, modifications by the vendor. The existing staff of the Investigations Section is not equipped to handle the expanded workload presented by this requirement.	The impact response is based on the assumption that the requirement is referring to facial recognition processing and not the “valid without photo” document, currently issued by some states, for religious reasons. Clarification is required.
Establish an effective procedure to confirm or verify a renewing applicant’s information	POTENTIAL IMPACT – Currently, the image, fingerprint and SSN are confirmed for renewal applicants presenting their license/ID card. However, because customers must renew if they have lost, had stolen or mutilated their Colorado license or if they are changing their name, in addition to the verification of their image, fingerprint and SSN, they must also present identification documents to re-establish their identity. Impact would be on office procedures, customer wait time and, possibly, cost to inform	Because this would be a drastic change in established procedures, some type of public service announcement, to renewal customers particularly, would be in order.

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	the public of the new renewal procedures.	
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	NO IMPACT – Currently in compliance	
Check other states if a person already was issued a DL in another state	POTENTIAL IMPACT – A system for this type of verification is not currently on-line. If the customer has a license to surrender, currently only a state-to-state check is possible. Only restraint actions and/or commercial driver license information shows on the existing national system	Should a system go online that would accommodate this requirement, such as the AAMVA-proposed DriverS, Colorado would participate.
Ensure physical security of locations where DL/ID cards are produced	NO IMPACT – Currently in compliance	
Subject all person’s authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	POTENTIAL IMPACT – Applicants considered for employment are subjected to a criminal background check, only. Fiscal impact is involved with a security clearance.	The assumption is being made that the security clearance is mandatory not only for driver license employees but also for vendor employees. Clarification is required.
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	NO IMPACT – Currently in compliance. Colorado uses AAMVA’s FDR (Fraudulent Document Recognition) training program.	
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	NO IMPACT – Currently in compliance	
Alternative document design if it does not meet federal standard	N/A	
Legal Presence Requirement	NO IMPACT – Currently in compliance	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	POTENTIAL IMPACT – Colorado is in compliance with the existing requirements of	

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	posting restraint actions, per the Compact Law, and CDL information per the Federal Safety Act, however, we do not allow direct access, by other states, to our database. Modifications could have a fiscal impact and vendor impact if access is to include photos and signatures.	
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 driver’s histories, including motor vehicle violations, suspensions and points on licenses 	NO IMPACT – Currently in compliance	
Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	NO IMPACT – State law does not allow issuance to applicants who cannot prove lawful presence.	

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

Most of Colorado’s questions center on clarification of the listed requirements:

1. Section 202 (a)(9) Features on the document and in the machine-readable technology – as stated, the requirement seems to indicate that all features on the front of the card should be in the machine-readable technology. Please clarify whether this includes the signature and the photograph.

2. Section 202 (d)(3) Mandatory facial image capture – does this requirement refer to the facial recognition process or does this requirement simply mean that there will no longer be exemptions for a non-photo document?
3. Section 202 (d)(4) Confirm/verify renewal applicant's information – does this requirement refer to confirming the data elements on the card/database or requiring presentation of all documents listed in Section 202 (c) (1) prior to issuance?
4. Section 202 (d)(8) Appropriate security clearance for all persons authorised to manufacture or produce DL/ID cards – will this requirement include vendor employees as well as driver license employees?
5. Section 204 (a) states that grants may be available to assist States in conforming to the minimum standards. Should a State find it necessary to apply, what is the application process?
6. What will happen to Internet and renew-by-mail processes because of the Act?

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