

# CONNECTICUT

## Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)		
Have following data elements/features on the document: <ul style="list-style-type: none"> <li>55. Full Legal Name</li> <li>56. Person's Date of Birth</li> <li>57. Person's Gender</li> <li>58. Person's DL or ID Card Number</li> <li>59. Digital Photograph of Person (and retention)</li> <li>60. Person's Address of Principle Residence</li> <li>61. Person's Signature</li> <li>62. Physical Security Features to prevent tampering, counterfeiting or duplication</li> <li>63. Common Machine Readable Technology:</li> </ul>	Yes. (current system limited to 35 characters); Do not have current "name history" capability. Yes Yes Yes (9 digits) Yes Yes (must provide residence address) Yes 7 security features 2-D Bar code	Regulations should define "name history." Also, should clarify "legal" name (Connecticut is a "common law" state).
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	Need enabling legislation	
Amending card design to show/indicate that it is a temporary document with a "different than usual" expiration date	Need enabling legislation	
Verification at Source: Enabling your system to electronically verify documentation with:	Connecticut now uses FLLQ (NCIC)	Verification of Birth Certificates must be addressed somehow in the regulations.

<b>REAL ID ACT REQUIREMENT</b>	<b>IMPACT</b>	<b>ASSUMPTIONS</b>
1. SSOLV 2. SAVE 3. DEERS (DOD) 4. Other jurisdiction (DL/ID card) 5. Birth certificate 6. Other...i.e. third party vendors	Yes  Do not currently use  Do not use  Acquiring Proofing Workstations for authenticating DL/ID cards  No  Acxiom Address Verification System	
Developing access capability to SAVE system	Will commence work on MOU	
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	No. CT DMV currently does not have such a system.	
Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years	CTDMV does not currently have optical imaging capability Yes	
Subject each person applying for a driver's license or identification card to mandatory facial image capture	Yes	
Establish an effective procedure to confirm or verify a renewing applicant's information	May have impact on privatized renewal stations (AAA)No- No Driver's system	
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 system available to access duplicate SS# in other states. CTDMV can only verify duplicate SS# for Connecticut residents.	
Check other states if a person already was issued a DL in another state	No- No DriverS system	
Ensure physical security of locations where DL/ID cards are produced	Yes	

<b>REAL ID ACT REQUIREMENT</b>	<b>IMPACT</b>	<b>ASSUMPTIONS</b>
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	Do background checks.	Regulations must define "security clearance"
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Use AAMVA system	
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	Ok CT CDL = 4 years; Non-CDL= 6 years	
Alternative document design if it does not meet federal standard	Intend to meet federal criteria	
Legal Presence Requirement	Yes	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	Current information systems limitations	
Maintain a state motor vehicle database that contains at a minimum: <ul style="list-style-type: none"> <li>▪ All data fields printed on DL/ID cards</li> <li>▪ motor vehicle driver's histories, including motor vehicle violations, suspensions and points on licenses</li> </ul>	Yes, currently resides in flat files Yes, currently resides in flat files	
<b>Optional</b> Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	Not applicable	

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

**Major issues for Connecticut involve the need for information systems and associated costs. Most legal requirements are already met or will be met.**

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

**In progress, will forward when completed.**

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"> <li>▪ All data fields printed on DL/ID cards.</li> <li>▪ Motor vehicle drivers' histories, including motor vehicle violations, suspensions and points on licenses.</li> </ul>	No impact.	Assumes that promulgated regulations contain the same types of information we retain today.
<b>Optional</b> Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	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 on HR 1268.

**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?

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