

DISTRICT OF COLUMBIA

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)	Already compliant	
Have following data elements/features on the document: 73. Full Legal Name 74. Person's Date of Birth 75. Person's Gender 76. Person's DL or ID Card Number 77. Digital Photograph of Person (and retention) 78. Person's Address of Principle Residence 79. Person's Signature 80. Physical Security Features to prevent tampering, counterfeiting or duplication 81. Common Machine Readable Technology:	<ol style="list-style-type: none"> 1. Already Compliant 2. Already Compliant 3. Already Compliant 4. Already Compliant 5. Already Compliant 6. Already Compliant 7. Current on document, but will now require creation of separate field in data base to store 8. Will need re-design based on specific standards which are pending. Level of security will impact whether license should be produced centrally or locally. 9. Again, need specifics on standards to identify impacts and costs 	Ballpark cost for data field medication to system ~\$100,000 Costs will be a function of specifications
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	Currently done, but will require creation of new data field to track in system	Ballpark cost for data field medication to system ~\$100,000
Amending card design to show/indicate that it is a temporary document with a "different than usual" expiration date	Depending on other general specifications, may require separate card type if so est. \$50-100,000 system design changes	

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<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. Already Compliant 2. Need specifics re MOU requirements – requires new system interface 3. Need specifics on requirements– requires new system interface 4. Presumed will happen through AAMVAnet/PDPS 5. No idea what will be required. If incrementally via 3rd party software like Viisage, etc. will require one-time system costs and lesser on-going staff costs. If through completely manual interaction directly with each jurisdiction, much higher on-going staffing costs. 6. Unknown what this means 	<p>Ballpark cost for any system interface ~\$500,000</p> <p>Ballpark cost for any system interface ~\$500,000</p> <p>Ballpark cost for interface enhancements/medication \$100-300,000</p> <p>One time system costs ~\$1.0 million, with on-going annual additional system maintenance and staffing costs of ~\$500,000.</p> <p>Fully manually system could require as much 35 additional staff (+30%) at approximately 1.75 million/year</p>
<p>Developing access capability to SAVE system</p>	<p>Need to know specifics of MOU/Requirements</p>	<p>Ballpark cost for any system interface ~\$500,000</p>
<p>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</p>	<p>Will move to a front-end of process image capture at each work station</p>	<p>Equipment estimate \$500,000</p>
<p>Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years</p>	<p>Will integrate images into Driver data-base, for future storage and retrieval</p>	<p>Programming estimate \$500,000</p>
<p>Subject each person applying for a driver’s license or identification card to mandatory facial image capture</p>	<p>Will move to a front-end of process image capture at each work station</p>	<p>Additional cameras for each workstation ~ \$150,000</p>

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Establish an effective procedure to confirm or verify a renewing applicant's information	Need clearer understanding of requirements. Will presumably have to apply "new applicant" standard on first renewal following Real ID effective date, then image capture and storage with driver record should allow exception processing thereafter	Will require additional staff, processing time for all first-cycle renewals ~750,000 in additional staffing costs annually for the first five year cycle
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	Requires expansion of internal "Service Integrity" Unit	Est. minimum 5 additional positions for all resolution/enforcement matters @ ~\$350,000 annually
Check other states if a person already was issued a DL in another state	Hopefully via AAMVANet/PDPS – expansion/modification	Costs a function of specifics to be determined
Ensure physical security of locations where DL/ID cards are produced	Will require enhanced inventory control system, facility modifications, etc. Will need specifics on license feature requirements to determine if a centralized versus decentralized issuance.	With enhanced verification and un-likelihood of over-the-counter service, more likely to go centralized with mail fulfillment. MAJOR CONCERN re effectiveness and security of any mailing processes – currently experiencing sever unreliability of US Mail services.
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	Will have to address local legislation/union contracts re mandatory background checks for all employees. Will need enhanced contract provisions for some service providers.	Minimum cost of \$30,000 for background checks
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Will required updates and enhancements based on specifics of regulations and requirements. Key need is access to specimen documents and fraud samples for hands-on training. Will need computer-based and classroom based materials	~ \$100,000 for curriculum development and materials
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	Already Compliant	
Alternative document design if it does not meet federal standard	Need specifics in order to determine	

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Legal Presence Requirement	Already have requirement for Social Security Number which is de facto legal presence standard. Will need local policy decision re non-ID driver's license for local use.	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	Hopefully via AAMVANet/PDPS enhancements/modification	Funding a function of specifics
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 	Addition of new data fields (immigration status, signature at minimum) as described above. Requires automated linkage to court system on violations, and update of driver records, point assignment system	~\$600,000 effort for integration and reprogramming
Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	To be determined via local policy process	Est. \$150,000 to implement separate “license” type

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

Need specific regulations ASAP in order to determine real impacts, follow-on questions.

Biggest questions with respect to type, level and extent of validation required for breeder documents, particularly birth certificates.

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

N/A