

IOWA

Jurisdiction Impact Analysis Real ID Act

Real ID Act Requirement	IMPACT	ASSUMPTIONS	Additional Comments
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)	Should be none to minimal. Our new driver license system, to be implemented in April '06 will allow for 125 characters. Our new driver license allows for 111 characters to printed on the card. We'll use the AAMVA truncation rule for any thing longer than 111 characters	Assume the AAMVA system and DL/ID card document specs will meet minimum DHS requirements for full name	
Have following data elements/features on the document:	1-4: We have now 5: We have now for everyone except persons with bona fide religious objection. They are issued a license that is "valid without photo"and no file photo is capured either. 6: we have now 7: we have now 8: we exceed AAMVA card spec now 9: our new license will have 2D barcode, mag stripe & digital watermark Authentication/re-enrollment of those already in the system will have a customer impact	1: we'll follow the truncation rules 5: Assume DHS will provde for same Valid w/o photo exception based on U.S. Constitution. 7: Assume DHS will allow alternative for those physically incapable of signing. 8: Assume AAMVA DL/ID card spec will satisfy this requirement. 9: Assume AAMVA DL/ID card spec requirement for PDF417 will satisfy this requirement	
1. Full Legal Name			
2. Person's Date of Birth			5: We can provide background on case law if you'd like it
3. Person's Gender			
4. Person's DL or ID Card Number			7: We currently allow use of a stamp or signature by power of attorney
5. Digital Photograph of Person (and retention)			
6. Person's Address of Principle Residence			
7. Person's Signature			

8. Physical Security Features to prevent tampering, counterfeiting or duplication			
9. 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)	Will require a legislative change reducing term of issuance from 2 to 1 yr for person with indefinite end of stay.		
Amending card design to show/indicate that it is a temporary document with a "different than usual" expiration date	We need guidelines. It may require some change to our photolicensing software.	We'd prefer to do this in the header.	The current AAMVA card spec shows Zone II for "other data fields for national or jurisdictional purposes in human readable format". May need to change the spec.
Verification at Source:	1: We will implement in July '05 2: We think we can implement easily with the existing external web access, but would prefer to have it fully intergated within our system. That will take IT staff time and money. Transaction fees seem high. 3: not enough known to assess an impact 4: none except potential response time issue 5: Major. Even though we participate in EVVER, and it functions well, we don't anticipate the states' Vital Records agencies will be able to make the needed		Our new DL system is designed to let us add external interfaces easily.
Enabling your system to electronically verify documentation with:			Any electronic verification that does not deliver 7-10 second response may cause us customer (wait time) issues as we are an OTC state.
1. SSOLV			
2. SAVE			
3. DEERS (DOD)			

4. Other jurisdiction (DL/ID card)	database/system upgrades within 3 years. 6: Transaction fees will probably be our biggest impact.	4: Tasks 8&9 functionality will be implemented nationwide.	
5. Birth certificate			5: At this time we don't follow up on the bad hits
6. Other...i.e. third party vendors			
Developing access capability to SAVE system	Minor-see #2 above.	CDLIS Response time parameter - should be able to use the available web interface <i>our assumption is that we would receive timely and accurate information</i>	
Real ID Act Requirement	Impact	Assumptions	Additional Questions
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	We currently have this capability		
Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years	Technical – minor	Assume we can do one or the other. Will require more staff time to scan/index the documents.	It's not clear that additional staff will be needed at this time. We may be able to absorb with current staff.
	Staffing - not clear		
Subject each person applying for a driver's license or identification card to mandatory facial image capture	Our new DL/Photo Licensing system allows for this.	Assume religious objector exemption issue will be resolved at Federal level.	
Establish an effective procedure to confirm or verify a renewing applicant's information	We need more information about requirements	We believe our new system and card will allow us to meet reasonable requirements	

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	Minor		We're going to send the customer to the Social Security Administration to clear up the discrepancy
Check other states if a person already was issued a DL in another state	Minor	AAMVA provides this function	
Ensure physical security of locations where DL/ID cards are produced	We need information on minimum requirements	We believe we can meet reasonable requirements with little difficulty by building on procedures in place now for the secure storage of consumables and equipment	
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	We need more information on minimum requirements. If it's kept at the level of a criminal history background check, it should be little impact. If it requires an in-depth security clearance review of the type used for prospective law enforcement employees within our department it could be very time consuming. In either case we believe most of the costs will be associated with law enforcement personnel already on the state/local payroll.	Our MVE officers or local law enforcement will conduct a background check on anyone that is involved in the issuance of DL & ID. Photo licensing vendors/card material suppliers will conduct background checks of their own employees.	
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	None.	Assume AAMVA FDR will meet/exceed any minimum requirement	
Limit period of validity of DL/ID cards that are not temporary to	Already 5	Will impact our ability to offer renewal by mail or internet in the future.	

a period not exceeding 8 years			
Alternative document design if it does not meet federal standard	Minimal. Could require some change to our photo licensing software.	Our DL will meet and exceed the federal standards	
Legal Presence Requirement	We've required proof of legal presence/citizenship for new licensees since 2002. There will be some impact on those renewing who's legal presence/citizenship has never been verified.	Will require a legislative change to bring Iowa law into strict compliance with Federal law	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	Minor.	Assume this will be an AAMVAnet/NLETS function	
Maintain a state motor vehicle database that contains at a minimum:	None.	We currently have a data base that contains all of this information.	
All data fields printed on DL/ID cards			
motor vehicle driver's histories, including motor vehicle violations, suspensions and points on licenses			
Optional			
Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	Minor	We know this will be proposed. Don't know what to expect.	