

KENTUCKY

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)	KY uses full legal name now on driving records. Characters for each name; Last 25, First 15 and Middle 10. Impact of expanding these fields would be costly without benefit. Focus would be better spent on standards defining first, middle and last names.	
Have following data elements/features on the document: 136.Full Legal Name 137.Person’s Date of Birth 138.Person’s Gender 139.Person’s DL or ID Card Number 140.Digital Photograph of Person (and retention) 141.Person’s Address of Principle Residence 142.Person’s Signature 143.Physical Security Features to prevent tampering, counterfeiting or duplication 144.Common Machine Readable Technology:	Full name not on license, middle initial used and truncation on long names over 35 characters On license On license On license On license, yes retained since 3/2002 Yes on license. Mail address in computer system Yes on license and stored with image Yes Yes 2D Barcode, AAMVA 2000 standard now	
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	KY issues license to end of legal stay or normal 4 year expiration if stay longer.	
Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date	This would be a new requirement for KY temporary document currently license looks same except expiration date.	

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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 	<p>Yes</p> <p>No</p> <p>No</p> <p>No</p> <p>No, however KY does have access to KY Vital Stats system for checks as needed.</p>	
<p>Developing access capability to SAVE system</p>	<p>KY has not started this process yet</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>KY has no means to address this requirement at this time. This would be a very huge impact upon KY</p>	<p>KY has over 150 locations that would need this technology. There are over 220 non-PCs (3270 terminals) and 170 digitized license workstations in license system. Process could require up to additional 300 people to handle additional workload. Offices would need estimated 300 scanners and a central server to house the documents. The additional equipment and people will create space problem that will lead to requests for additional office space from courts, which issue licenses.</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>KY has no means to address this issue at this time. Additional copy machines, employees handle at clerk & central offices, and office space needed to house information.</p>	<p>KY has over 150 locations that would need this technology. There are over 220 non-PCs (3270 terminals) and 170 digitized license workstations in license system. Process could require up to additional 300 people to handle additional workload. Offices would need estimated 300 copy machines and a central warehouse to house the documents. The additional equipment and people will create space problem that will lead to requests for additional office space from courts, which issue licenses.</p>

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Subject each person applying for a driver's license or identification card to mandatory facial image capture	KY complies now, since 3/2002.	
Establish an effective procedure to confirm or verify a renewing applicant's information	Previous image of applicant appears before issuance. SSOLV ran on applicants. If this requirement goes further, then it would be a new requirement to KY.	We assume this is more than showing existing license.
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	Yes, upon proof of SSN w/SSA and other proof of identity license, bank, etc. KY will notify state to determine identity	Implementation of DRIVERS would help this requirement.
Check other states if a person already was issued a DL in another state		States can ask the question to applicant but DRIVERS needed to enforce
Ensure physical security of locations where DL/ID cards are produced	Requirement is very difficult in KY where court officials issue licenses over the counter and store consumables at local offices. Division issues procedures and security measures but it up to court clerks to perform those security measures.	
Subject all person's authorised to manufacture or produce DL/ID cards to appropriate security clearance requirements	KY performs some level of background checks now but additional measures needed.	Background check in Real ID would be expanded. Money needed.
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Very large impact and concern for KY since court clerk offices issue license, not DMV employees. There are over 800 users and there is a 25% turn over rate. No money currently set aside to perform this training and travel.	The 20 hours FDT will be a very challenging requirement. No funding. There is concern that training would not produce better results in the current environment.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	KY issues a 4-year license. KY complies with requirement	
Alternative document design if it does not meet federal	New requirement for KY. State may have a problem if	It takes a 4-year roll out of a new license once a change

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standard	requirement in 3 years.	is made.
Legal Presence Requirement	Yes	Still could be a problem if applicant fraudulently submits statement.
Provide electronic access to all other states to information contained in the motor vehicle database of the state	Do not understand fully the meaning of this, but it is new requirement. It would seem that DRIVERS needed to comply.	
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 	Yes KY maintains record of traffic convictions for 5 years	KY 5-year purge would seem to be a problem on this requirement especially for identification issues and exchange of information with other states.
Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	KY opposes this option because government issued document is issued to someone without proper identification credentials.	

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

The implementation of Real ID in just 3 years is a problem because rulemaking has not begun, the length of time for a change to take place on license population (4 years), funding for training, equipment, PCs and employees needed to perform new duties related to scanning. Is there a possibility of revisiting some REAL ID standards and some requirements?

It seems that the DLA model was used for a lot of the REAL ID Act but state membership is not required. Why?

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