

# MARYLAND

## Maryland MVA

### Real ID Act - Impact Analysis

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
<p>Full Legal Name into Driver Licensing System (DLS) (In Record, on Document)</p>	<p>Modify DLS application and databases. Modify MVA demographic databases. Modify all MVA business applications utilizing the MVA demographic database.</p>	<p>Assumes MVA will maintain a single demographic database for all business applications. This will necessitate applying the same identity standards to all business applications and will require MD legislative changes.</p> <p>If segregated databases are utilized, the impact will be limited to the DLS application and associated databases. May require MD legislation to resolve database discrepancy, precedence and synchronization issues.</p>
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> <li>163.Full Legal Name</li> <li>164.Person's Date of Birth</li> <li>165.Person's Gender</li> <li>166.Person's DL or ID Card Number</li> <li>167.Digital Photograph of Person (and retention)</li> <li>168.Person's Address of Principle Residence</li> <li>169.Person's Signature</li> <li>170.Physical Security Features to prevent tampering, counterfeiting or duplication</li> <li>171.Common Machine Readable Technology:</li> </ul>	<ul style="list-style-type: none"> <li>1. Full legal name - Modify all card layouts to accommodate.</li> <li>2. Date of Birth – In compliance</li> <li>3. Gender – In compliance</li> <li>4. Card Number – In compliance</li> <li>5. Digital Photo – In compliance</li> <li>6. Residence Address – In compliance</li> <li>7. Signature – In compliance</li> <li>8. Security features – In compliance</li> <li>9. Machine Readable – In compliance</li> </ul>	<ul style="list-style-type: none"> <li>1. Certain card features/graphics may need to be removed in order to physically fit the full legal name on the cards.</li> <li>2. None</li> <li>3. None</li> <li>4. None</li> <li>5. None</li> <li>6. Assumes only a single address will be printed on cards. CDL currently uses mailing address on card. MD Legislative changes are required to place residence address on CDL card.</li> <li>7. None</li> <li>8. Assumes that hologram, UV print, microprint line, etc. are currently acceptable.  Card layout modification will be required when future standards for AAMVA hologram and level 3</li> </ul>

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		<p>security features are implemented.</p> <p>9. Assumes 2d barcode (PDF 417) is acceptable and that additional data and encryption will not be required.</p>
<p>Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)</p>	<p>Temporary Card design in compliance.</p> <p>Modify DLS to allow user definable expiration date on current temporary cards.</p>	<p>MD legislation will be required in order to tie the expiration date to the end date of permitted stay.</p>
<p>Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date</p>	<p>In compliance</p>	<p>Assumes AAMVA standard remains.</p>
<p>Verification at Source:</p> <p>Enabling your system to electronically verify documentation with:</p> <ol style="list-style-type: none"> <li>1. SSOLV</li> <li>2. SAVE</li> <li>3. DEERS (DOD)</li> <li>4. Other jurisdiction (DL/ID card)</li> <li>5. Birth certificate</li> <li>6. Other...i.e. third party vendors</li> </ol>	<ol style="list-style-type: none"> <li>1. SSOLV – In compliance SSN Non-eligibility Letter - Modify DLS eligibility check to interface with AAMVA interface to SSA</li> <li>2. SAVE - Modify DLS eligibility check to interface with SAVE.</li> <li>3. DEERS - Modify DLS eligibility check to interface with AAMVA interface to DEERS.</li> <li>4. Other Jurisdictions (all data verification/exchange) - Modify DLS eligibility check to interface with AAMVA interface to other jurisdictions.</li> <li>5. Birth Certificate: Modify DLS eligibility check to interface with AAMVA interface to NAPHSIS / State Vital Record Agencies.</li> <li>6. Third Party Providers (address verification) - Modify DLS eligibility check to interface with third party provider(s).</li> <li>7. General Manual Verification – If any or all of the</li> </ol>	<ol style="list-style-type: none"> <li>1. SSOLV – None SSN Non-eligibility Letter - Assumes AAMVA interface to SSA exists and that SSA will provide verification</li> <li>2. SAVE – MVA currently has an MOU with DHS to utilize SAVE in a stand-alone configuration.</li> <li>3. DEERS - Assumes AAMVA interface to DOD exists and that DOD will provide military ID verification</li> <li>4. Other Jurisdictions - Assumes AAMVA interface to other jurisdictions exists and that jurisdictions will provide data and verifications.</li> <li>5. Birth Certificate: Assumes AAMVA interface to NAPHSIS / State Vital Record Agencies exists and that NAPHSIS will provide verifications.</li> </ol> <p>In reality there will likely be varying combinations of electronic and manual validation occurring until fully automated systems are in place in all states. There will be significant staffing / cost impacts during the earlier years when there is a high percentage of manual verification occurring.</p>

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	<p>interfaces cannot be established electronically, significant increases in staffing, facilities and customer wait time will result.</p>	<p>6. Third Party Providers (address verification) – Assumes future federal regulation will allow third party providers to verify certain data and that interfaces can be implemented.</p> <p>7. General Manual Verification – Electronic interfaces cannot be established.</p>
<p>Developing access capability to SAVE system</p>	<p>Modify DLS eligibility check to interface with SAVE.</p>	<p>MVA currently has an MOU with DHS to utilize SAVE in a stand-alone configuration. An amendment to the MOU will be required to allow access to all required databases and when a direct interface is implemented.</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>Modify DLS to require capture of additional documents. Create application to transmit document images to others.</p>	<p>May require legislation to enable transmission of data and documents to other agencies depending on regulatory requirements.</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>Increase long-term electronic storage capacity.</p>	<p>None</p>
<p>Subject each person applying for a driver’s license or identification card to mandatory facial image capture</p>	<p>In compliance</p>	<p>None</p>
<p>Establish an effective procedure to confirm or verify a renewing applicant’s information</p>	<p>Modify DLS to include indicators signifying that certain data and / or documents have been verified and validated.</p>	<p>Assumes renewal transactions will not require revalidation of all source documents / data. Assumes a voluminous audit trail will not be required as part of a validation indicator.</p>
<p>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</p>	<p>Modify DLS eligibility check to interface with AAMVA interface to other jurisdictions. AAMVA to develop discrepancy resolution process.</p>	<p>Assumes AAMVA interface to other jurisdictions exists and that jurisdictions will provide data and verifications. Assumes AAMVA develops standardized resolution</p>

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resolve the discrepancy and take appropriate action		processes for discrepancies.
Check other states if a person already was issued a DL in another state	<p>Modify DLS eligibility check to interface with AAMVA interface to other jurisdictions.</p> <p>AAMVA to develop process for requesting termination of DL/ID in original jurisdiction upon issuance to DL/ID in the new jurisdiction.</p>	<p>Assumes AAMVA interface to other jurisdictions exists and that jurisdictions will provide data and verifications.</p> <p>Assumes AAMVA develops processes for requesting termination of DL/ID in original jurisdiction upon issuance to DL/ID in the new jurisdiction</p>
Ensure physical security of locations where DL/ID cards are produced	In compliance.	<p>Assumes current procedures and physical / electronic security measures are adequate. This may be affected by new regulations.</p> <p>MVA is currently studying centralization / outsourcing of card production and fulfillment.</p>
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	Possible significant cost and time impacts depending on clearance standards established. Could cause staffing shortage if clearances are not completed quickly and temporary authority is not granted.	<p>Assumes standards for security clearances are established.</p> <p>May require MD legislation authorizing MVA to conduct certain types of security checks.</p>
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	In compliance with current AAMVA level 1 & 2.	<p>Assumes current AAMVA standard remains.</p> <p>In the likelihood that all personnel will require level 2 training an additional cost and staffing impact will occur for initial and ongoing training.</p>
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	In compliance	MD Legislation required limiting the validity period of military license holders who are stationed outside of Maryland.
Alternative document design if it does not meet federal standard	None	Assumes Maryland will fully comply with Real ID Act and will not issue a driving certificate.
Legal Presence Requirement	<p>Transactions for temporary DL and ID cards should decrease.</p> <p>Renewal transactions for those eligible will increase</p>	State legislation required if this requirement is pursued.

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	<p>due to shorter renewal periods although this will be tempered by the limited number of renewal periods the individual may qualify for.</p> <p>Overall the expected outcome is a net decrease in DL and ID transactions.</p>	
<p>Provide electronic access to all other states to information contained in the motor vehicle database of the state</p>	<p>Develop and implement a data exchange server and database separate from the production environment.</p>	<p>Significant data traffic demands will necessitate a separate environment to minimize/eliminate impacts on the production DLS environment.</p>
<p>Maintain a state motor vehicle database that contains at a minimum:</p> <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>	<p>Any change in the amount of data captured and stored will require modifications to the DLS application and the DLS databases.</p>	<p>None</p>
<p><b>Optional</b></p> <p>Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.</p>	<p>Create new product flow /eligibility requirements in DLS to produce certificate.</p>	<p>State legislation required if this option is pursued.</p>

## **Questions:**

### **General**

- 1) What is the effective date that states must be compliant, not allowing for any extensions?
- 2) Since the definition of "state" does not include Canada, does that affect reciprocity and the Driver License Compact?

### **Credential Review**

- 3) Our interpretation is that all existing driver license and identification card holders, as well as new applicants, will have to submit qualifying ID documents upon their next renewal after the implementation date of the bill. That documentation would have to be scanned and confirmed with the issuers. Is this a correct interpretation?
- 4) Since it is highly unlikely that all state vital record agencies will be electronically connected for authentication upon the effective date of the legislation, how are verifications of birth certificates expected to be handled?

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- 5) Will third party verification be permitted if direct verifications by the third party are made with the issuers of the source ID documents?
- 6) The retention cycle requires paper documentation be maintained for 7 years and, if electronically stored, for 10 years. How will this affect required documents at the time of renewal? If once we authenticate the ID document, can we use an indicator on the record and not require documentation at each renewal cycle?
- 7) Does the Real ID Act preclude the establishment of license or ID card renewal by mail or internet on subsequent renewals after the first renewal under the Real ID Act if a state establishes a reliable process to verify or confirm the renewing applicant's information and documents on file?
- 8) What does "common machine readable technology" mean? What is the standard? Are states required to encrypt data?
- 9) How do the requirements of The Real ID act apply to handling changes of address and name with respect to DL and ID cards.
- 10) We have a policy that allows an individual to carry a change of name or address card until their next renewal cycle. Will this policy need to be changed to be in accordance with the Real ID Act? In other words, would we have to require everyone to appear in person to receive a new license with their new name or address?
- 11) Maryland permits an individual, under the common law of the state, to change their name without a court process. Would a common law name change meet the definition of a person's full legal name as defined in this law?

#### **Minimum Issue Standards**

- 12) What is meant by the statement "...refuse to issue a driver's license or ID card to a person holding a driver's license issued by another state without confirmation that the person is terminating or has terminated the driver's license."

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- 13) For people who are not authorized to have a social security number, how do we validate the authenticity of the letter they receive from Social Security since that is not currently possible through SSOLV?

#### **Verification of Documents**

- 14) What does Homeland Security consider an effective procedure to confirm or verify a renewing applicant's information?
- 15) What if an issuer of a credential does not cooperate in providing information when MVA is trying to verify the ID source?

#### **Background Checks**

- 16) What is the standard for an acceptable background check for employees involved in the process of establishing ID?
- 17) What are disqualifying events in an employee's background that prevent them from being involved in confirming ID credentials?