

MICHIGAN

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)	Requires programming to increase size of field. Need state law change to provide authority to require full legal name.	One field or multiple fields to separate first, middle, last names?
Have following data elements/features on the document: Full Legal Name Person's Date of Birth Person's Gender Person's DL or ID Card Number Digital Photograph of Person (and retention) Person's Address of Principle Residence Person's Signature Physical Security Features to prevent tampering, counterfeiting or duplication Common Machine Readable Technology	Card re-design to incorporate common machine readable technology and physical security features. Need state law change to specify "full legal name".	2D barcode as the common machine readable technology? Will mag strip also be required? Need to know what data to encode.
Amending card design to show/indicate that it is a temporary document with a "different than usual" expiration date	Card re-design	Will there be a common design element to distinguish all state's temporary cards, such as color of card?
Verification at source: Enabling your system to electronically verify	Programming to interface with SSOLV, SAVE, DEERS. MOUs for exchange of data.	Will there be a national repository for birth records? Will PDPS be expanded to all drivers?
Documentation with: 1. SSOLVE 2. SAVE 3. DEERS (DOD) 4. Other jurisdiction (DL?ID card) 5. birth certificate 6. Other...i.e. third party vendors	Need state law change to authorize verification for driver's license and ID cards Need law change for ID law to parallel driver's license.	What fees are charged by each verification system?

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Developing access capability to SAVE system	Requires programming	What steps are involved in entering into an MOU for the SAVE system (required by 9/30/05)? Are specifications available? Who is the contact?
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	Requires purchase of scanning equipment for field offices. Needs state law change to capture and retain digital images of identity source documents.	All states will use the same common transferable format. Need to know what this format will be.
Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years	Increased storage costs	Why are there different storage timeframes between paper and electronic methods?
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	Requires programming to create field for temporary expiration date, state law change to authorize temporary expiration date.	
Subject each person applying for a driver's license or identification card to mandatory facial capture	Increased storage costs. May require programming to indicate no license is issued. Major procedure change if need to track incomplete transactions. May require state law change to authorize mandatory facial image capture at time of application.	
Establish an effective procedure to confirm or verify a renewing applicant's information	May require some type of authentication of renewing applicant. State law change required to verify applicant's information when renewing license or card.	Need explanation of an effective procedure
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.	May require a two-step process for SSN verification involving both SSA and other states. State law change to require SSN on Personal ID cards	Need clarification on how state resolves the discrepancy.
Check other states if a person already was issued a DL in another state	May require programming for an up-front check of other states.	Expansion of PDPS. Also, will ID cards be covered here? No information currently shared with other states on IDs. Need clarification as to what "confirms the person is terminating or has terminated" the out of state license means.
Ensure physical security of locations where DL/ID cards are produced	May need additional language in vendor contract	Will there be minimum or specific requirements for "physical security"?

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Subject all persons authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	May need additional language in vendor contract	Need criteria for discharge or non-hire decisions. Need specific definition of "appropriate security clearance requirements."
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards.	Michigan complies.	
Alternative document design if it does not meet federal standard	Card re-design	Will there be specific re-design standards?
Legal presence requirement	MI needs state law change to require legal presence	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	State law change needed to require access to Personal ID card data and highly restricted personal information.	Will other states need access to images and source documents? Need specific list of data elements required.
<p>Maintain a state motor vehicle database that Contains at a minimum:</p> <p>All data fields printed on DL/ID cards Motor vehicle driver's histories, including motor vehicle violations, suspensions and points on licenses</p>	Michigan complies.	
<p>Optional</p> <p>Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.</p>		

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

To what degree must states verify residency? For example, must they confirm an account with a utility, or is it sufficient for the applicant to present a utility bill that we know “looks authentic”?

What photo identity documents will be acceptable identity documents? Could a state driver’s license be an acceptable photo identity document?

Will a marriage license be acceptable documentary evidence of a name change? If so, what if the applicant has not yet changed their name on Social Security records?

What documents are acceptable evidence of date of birth? (e.g., Government issued only? Hospital issued?)

What is proof of an SSN? Is a W-2 or pay stub acceptable or must the applicant present the card?

What is verification that a person is ineligible for a SSN? Is a passport with temporary visa evidence that the applicant has no SSN? Will SSA provide a standard document that the person is ineligible or is not required to have a SSN?

Is proof of residence required only at issuance? Must license holders present proof of residence when they make a change of address?

What is valid evidence of legal status? Can an SSN card be that evidence?

If an applicant presents a passport and temporary visa, do we need to verify the SSN?

How will the expiration date be determined for temporary licenses? Does the SAVE program provide information on Visa expirations?

Can applicants under 18 have different requirements, especially for residency? What might be acceptable proof of residency for these applicants? Will parental approval and/or parental documentation suffice?

Are corrections, duplicates, and renewals “applications?” Must applicants provide the same evidence of identity at each visit?

Must a state capture a new image for a license renewal, correction, or duplicate?

When a licensee moves from one state to another, does the former state transfer identity document images to the new state of record?

The Congressional Record refers to “reissuing a license.” What is meant by re-issue a license? Are renewals covered? Duplicates (in cases of lost licenses)? Corrections (in cases of name changes)?

What are effective procedures for confirming and verifying a renewing applicant’s information? Does this require a face-to-face transaction or will capture of a signature suffice? Will a PIN authorization be considered effective? If so, under what conditions would a PIN-based system be acceptable?

What must the state do to “resolve discrepancies” for SSN non-matches?

Per Brian, this is not what is required by law. See note above in table that says “Need clarification as to what “confirms the person is terminating or has terminated” the out of state license means.”

How will the process work for ID card holders who move from state to state? Are states supposed to cancel an ID card? Can an applicant hold an ID card in more than one state? Are states required to share ID card information?

Are the security clearance requirements only for employees at production facilities? What is the criteria for a discharge or non-hire

decision? How often must the employee be checked?

21. What information will be required to be encoded on bar code? Will mag stripe be used as well?

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