

NEW YORK

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
<p>Introduce Full Legal Name into Driver Licensing System (in Record, on Document)</p>	<p style="text-align: center;">MAJOR IMPACT</p> <p>We currently abbreviate the name to fit on our legacy license file. In order to capture the full name, we would need to develop a new license database that contains the full name. We would also need to modify several systems such as display and processing systems to display the full name as it appears on the license documents. The full name would also have to be stored in the bar code of the document. There are issues with file length that depend on what standards are developed for maximum field lengths.</p>	
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> 55. Full Legal Name 56. Person's Date of Birth 57. Person's Gender 58. Person's DL or ID Card Number 59. Digital Photograph of Person (and retention) 60. Person's Address of Principle Residence 61. Person's Signature 62. Physical Security Features to prevent tampering, counterfeiting or duplication 63. Common Machine Readable Technology: 	<p style="text-align: center;">NOMINAL IMPACT</p> <p>NYS DMV prints the DOB, gender, client ID, digital Image, signature and the mailing address on the license documents.</p> <p>We already data enter both mailing and residence addresses, if applicable, but we would need to change the information sent to the license print file. This would entail adding the residence address to the barcode information since this is what DeLarue uses to print the license. We would need to maintain the mailing address in the barcode. The Onserts machine reads the mailing address in the barcode and prints the address on the carrier card for</p>	

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	<p>mailing the license.</p> <p>Our documents have state of the art security features to prevent tampering and counterfeiting.</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 style="text-align: center;">MAJOR IMPACT</p> <p>This would require changes to the license file and approximately sixteen other systems that process against it.</p>	<p>A temporary driver’s license or identification can only be valid for the period of time of the applicant’s authorized stay in the United States or for a period of one year if there is no definite end to the period of authorized stay.</p>
<p>Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date</p>	<p style="text-align: center;">NO IMPACT</p> <p>We currently have the ability to distinguish between document types by printing legends on our documents, for example: “Under 21”, “Temporary Visitor”.</p>	
<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 style="text-align: center;">MODERATE IMPACT – to employ additional verification systems</p> <p>NYS DMV currently uses SSOLV. We also use the Department of Homeland Security Systematic Alien Verification Entitlements (SAVE) system to verify immigration documents when staff questions their validity. The additional verification systems would provide us with greater assurance of the authenticity of source documents however, these additional verifications would result in increased transaction time.</p>	

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Developing access capability to SAVE system	<p>MODERATE IMPACT – to fully integrate SAVE</p> <p>We currently have this ability as a stand-alone application. We would however need to integrate it into our processing system.</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>MAJOR IMPACT</p> <p>We must employ technology to capture digital images of the source documents so that the images can be retained in electronic storage in a transferable format. Digital images must be retained for a minimum of ten years or paper documents for seven. We have looked at a proprietary system for digital imaging of documents that also verifies the document's authenticity. We believe other companies will use this opportunity to expand their product line to include systems for this purpose. We would also have the option of developing our own imaging system. In any case there would be programming required for linkage of the digital files, whether DMV created or not, equipment purchases for scanning equipment and image storage, software license and maintenance fees and consulting for system design and development.</p>	

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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 align="center">MAJOR IMPACT (imaging system)</p> <p>We currently maintain paper files of our license applications for a period of 9 years. We would need to build or employ an imaging system that can accommodate the required retention periods.</p>	
Subject each person applying for a driver's license or identification card to mandatory facial image capture	<p align="center">NO IMPACT</p> <p>This is a current requirement in NYS.</p>	
Establish an effective procedure to confirm or verify a renewing applicant's information	<p align="center">MODERATE TO MAJOR IMPACT</p> <p>Before issuing the driver's license or identification card, the validity and completeness of the documents presented by the applicant as proof must be verified. This must be done for original and renewal transactions. Still, we will see an increase in transaction times, requiring as many as 200 additional field staff to handle this effort</p>	We are assuming we could mitigate this requirement by pre-screening and approving renewals to minimize the presentation and examination of documents in the offices.
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	<p align="center">NO IMPACT</p> <p>We currently have a SSN index file in NYS. We also use SSOLV to verify the SSN presented prior to issuance of a document.</p>	
Check other states if a person already was issued a DL in another state	<p align="center">MODERATE IMPACT</p> <p>We would need an integrated system to do so. Increased transaction time.</p>	
Ensure physical security of locations where DL/ID cards are produced	<p align="center">NO IMPACT</p> <p>Our document production vendor is located in a</p>	

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	secure area.	
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	<p style="text-align: center;">NO IMPACT</p> <p>All employees of our document production vendor are subject to security clearance.</p>	
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	<p style="text-align: center;">NOMINAL IMPACT</p> <p>We currently have a FDR training program. We would need to do additional training and enhance this program area.</p>	
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	<p style="text-align: center;">NOMINAL IMPACT</p> <p>Our licenses are valid for 8 years. We would need to eliminate our 10-year Non-Driver ID cards and issue them for a period of 8 years. This would require a change in statute as well as programming and production changes in order to meet this requirement.</p>	We would be able to change the 10-year period of validity to 8 years upon renewal of the NDID.
Alternative document design if it does not meet federal standard	<p style="text-align: center;">NO IMPACT</p> <p>We have recently re-designed our documents. These documents meet or exceed federal standards.</p>	
Legal Presence Requirement	<p style="text-align: center;">MODERATE IMPACT</p> <p>We would need to integrate SAVE into our processing system to do online verification of DHS documents.</p>	State Legislation requiring legal presence must be passed.
Provide electronic access to all other states to information contained in the motor vehicle database of the state	<p style="text-align: center;">MODERATE IMPACT</p> <p>Impacts cannot be established until the requirements</p>	

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	<p>are further defined. Assuming this requirement is less than the DRIVERS implementation but includes more than the current conviction and CDL data, there is also question as to what 'history' involves. Also how States are provided access is in question.</p>	
<p>Maintain a state motor vehicle database that contains at a minimum:</p> <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 	<p style="text-align: center;">NO IMPACT</p> <p>Based on our interpretations we are compliant with this. However, our motor vehicle histories are limited based on file conditions.</p>	
<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>	<p style="text-align: center;">MAJOR IMPACT</p> <p>This would require us to have a “dual” system for issuing either a secure DL or a driving permit only that cannot be used for identification purposes. Such a system would be very costly to implement and maintain.</p>	

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

What funding stream will be available and from what source, to assist with the implementation?

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



NEW YORK STATE DEPARTMENT OF MOTOR VEHICLES

6 EMPIRE STATE PLAZA, ALBANY NY 12228
RAYMOND P. MARTINEZ, COMMISSIONER

H.R. 418 Federal Real ID Act Summary of Impact DRAFT

Summary: This proposed legislation would require states to issue driver's licenses with minimum document requirements such as security features and the printing of the residence address on the license, verification of the validity of source documents presented for identification, maintain copies of all source documents, require certain minimum standards for license issuance, require evidence of lawful status and issue drivers licenses and identification cards valid coterminous with the period the individual is authorized to stay in the United States. States would have 3 years to implement the legislation.

Note: Until final passage of legislation and, more importantly, adoption of associated federal rules and regulations, this assessment is necessarily preliminary and, no doubt, incomplete.

Preliminary Assessment of Program & Fiscal Impact

Regulations will need to be promulgated to implement this legislation. Until this is done, we are estimating the impact of the legislation based on our assumptions of how we might best implement this legislation. Regulations can greatly affect our time estimates if requirements not envisioned below are required. Fortunately, New York State has already implemented many of the requirements of this proposed law. Our security features and proof of identity as well as our social security number verification program put us at an advantage to many other states. Still, there are significant program and fiscal implications to those provisions of the legislation that we would have to implement.

1. *Print a full legal name on the license documents*- We abbreviate the name to fit on our legacy license file. In order to capture the full name we would need to develop a new license database that contained the full name and also modify several systems such as display and processing systems like Compass, WISE and Abstracts to display the full name as it appears on the license documents. The full name would also have to be stored in the bar code of the document too. There are also issues with file length that depend on what standards are developed for maximum field lengths.
2. *Print residence address on license document*-We currently print the mailing address on the license documents. We already data enter both addresses, if applicable, but we would need to change the information sent to the license print file. This would entail adding the residence address to the barcode information since this is what DeLarue uses to print the license. We would need to maintain the mailing address in the barcode. The Onsets machine reads the mailing address in the barcode and prints the address on the carrier card for mailing the license.
3. *Proof of residency*-We would need to require proof of residency. This documentation would be added to our system as a check box to show proof was submitted.
4. *Evidence of lawful status*-DMV currently uses the Department of Homeland Security Systematic Alien Verification Entitlements (SAVE) system to verify immigration documents when staff questions their validity. When effective, HR-418 will likely require on-line interfaces with this and, conceivably, other data bases.
5. *Coterminous term of license*-A temporary driver's license or identification can only be valid for the period of time of the applicant's authorized stay in the United States or for a period of one year if there is no definite end to the period of authorized stay. This would require changes to the license file and approximately sixteen other systems that process against it.
6. *Digital Images of all source documents*-We must employ technology to capture digital images of the source documents so that the images can be retained in electronic storage in a transferable format. Digital images must be retained for a minimum of ten years or paper documents for seven. We have looked at a proprietary system for digital imaging of documents that also verifies the

document's authenticity. We believe other companies will use this opportunity to expand their product line to include systems for this purpose. We would also have the option of developing our own imaging system. In any case there would be programming required for linkage of the digital files, whether DMV created or not, equipment purchases for scanning equipment and image storage, software license and maintenance fees and consulting for system design and development.

7. *Verification of data*-Before issuing the driver's license or identification card, the validity and completeness of the documents presented by the applicant as proof must be verified. This must be done for original and renewal transactions. We are assuming we could mitigate this requirement by prescreening and approving renewals to minimize the presentation and examination of documents in the offices. Still, we will see an increase in transaction times, requiring as many as 200 additional field staff to handle this effort.
8. *Miscellaneous*-Several other program areas will require some effort. There are requirements for the license barcode to contain all of the information on the document; documents can be valid for no more than a maximum 8-year term, the temporary license or ID must clearly indicate it is temporary and the date it expires, etc. Numerous forms and procedures must be revised and re-issued. Significant staffing effort will be required to conduct and coordinate project management, training, procurement, testing, and other functions.