

OHIO

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)		
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> 73. Full Legal Name 74. Person's Date of Birth 75. Person's Gender 76. Person's DL or ID Card Number 77. Digital Photograph of Person (and retention) 78. Person's Address of Principal Residence 79. Person's Signature 80. Physical Security Features to prevent tampering, counterfeiting or duplication 81. Common Machine Readable Technology: 	<p>The Ohio BMV is already in compliance with all provisions with the following exceptions:</p> <ol style="list-style-type: none"> 1. Full legal name – present capability to capture approx. 100 characters to be displayed on license/ID. Full name could be captured electronically; however, names exceeding 100 characters may have to be truncated as displayed on the card or require programming to reformat the fields displayed on the card. Ohio complies with current AAMVA standards. 2. Principal residence – Ohio requires street address (no P.O. boxes) and has multiple address fields capability. 	<p>Ohio law provisions may need to be revised. At minimum, the BMV Registrar would need to be permitted to adopt rules to conform to federal requirements.</p> <p>Programming changes are necessitated to accommodate the space full legal name.</p> <p>Issuance policy revisions will be required to enforce requirements for capturing full legal name and principal residence.</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)	Already in compliance.	N/A
Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date	Already in compliance.	N/A

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
<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 	<ol style="list-style-type: none"> 1. Already in compliance 2. Noncompliant – MOU required 3. Noncompliant – MOU required 4. Noncompliant 5. Noncompliant 6. Noncompliant 	<ol style="list-style-type: none"> 1. N/A 2-6. Programming changes will be necessitated. May necessitate computer hardware/software requirements. Issuance policy revisions will be required to incorporate electronic verification. Transaction times could be decreased adversely impacting customer wait times. Funding required.
<p>Developing access capability to SAVE system</p>	<p>Programming changes will be necessitated. MOU required by September 2005.</p>	<p>Issuance policy revisions will be required to incorporate electronic verification. Transaction times could be decreased adversely impacting customer wait times. Funding required.</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>Programming changes will be necessitated. Additional equipment and computer hardware/software requirements. Counter space requirements and power supply sources may be impacted.</p>	<p>Issuance policy revisions will be required to incorporate electronic verification. Transaction times could be decreased adversely impacting customer wait times. BMV would be required to house an additional 30+ million images annually. Significant funding is required to implement for 216 satellite offices.</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>On-site storage space requirements would increase.</p> <p>Computer image storage requirements are increased.</p>	<p>Policy revisions will be required to incorporate additional storage space. Office square footage requirements will need to be revisited.</p>
<p>Subject each person applying for a driver's license or identification card to mandatory facial</p>	<p>Already in compliance; however, the Amish do not have photos produced on license/ID cards.</p>	<p>Licenses/ID cards produced without photos would require "not acceptable for federal purpose" printed somewhere on the cards.</p>

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
image capture		Additional programming required.
Establish an effective procedure to confirm or verify a renewing applicant's information	Rapid retrieval for massive repository of stored images.	Additional programming required. Additional computer communications, hardware and software may be required. Funding required.
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	An individual must confirm Social Security Number (SSN) with the Social Security Administration (SSA). If a discrepancy is found, an individual must resolve the issue with SSA.	Policy revisions will be required to resolve SSN discrepancies. Additional staffing and training requirements necessitated. Additional training will be required for 216 satellite offices. Transaction and customer wait times could be adversely impacted.
Check other states if a person already was issued a DL in another state	Noncompliant	Only individuals who come to Ohio from out of state and previously held an Ohio license can be verified electronically. Additional programming required. Transaction and customer wait times could be adversely impacted.
Ensure physical security of locations where DL/ID cards are produced	Compliant	Printer ribbons, security laminates and blank cards are secured in locking cabinets on a daily basis.
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	Compliant	All employees are required to submit to background checks through the Ohio Bureau of Criminal Identification and Investigation (BCII) prior to issuing any licenses and ID cards.
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Noncompliant with AAMVA standard.	BMV Investigations compiled and conducts fraudulent documents training to local law enforcement agencies, courts, and all satellite license agency offices. Development of new presentation and training program required. Funding required.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	Compliant (4-year license expiration currently)	N/A

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Alternative document design if it does not meet federal standard	Compliant	N/A
Legal Presence Requirement	Compliant	N/A
Provide electronic access to all other states to information contained in the motor vehicle database of the state	Noncompliant	Additional programming required. Funding required.
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 	Compliant	N/A
Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	Noncompliant – Ohio presently has legal presence requirements	Additional programming required. Additional computer hardware/software may be required. Funding required.

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

Funding and resources are the considerable impacts for implementation of the Real ID Act requirements. Will federal funds be made available for implementation of the Real ID Act requirements?

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