

# OKLAHOMA

## Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)	None. Oklahoma is already in compliance.	
<p>Have following data elements/features on the document:</p> <ol style="list-style-type: none"> <li>1. Full Legal Name</li> <li>2. Person's Date of Birth</li> <li>3. Person's Gender</li> <li>4. Person's DL or ID Card Number</li> <li>5. Digital Photograph of Person (and retention)</li> <li>6. Person's Address of Principle Residence</li> <li>7. Person's Signature</li> <li>8. Physical Security Features to prevent tampering, counterfeiting or duplication</li> <li>9. Common Machine Readable Technology:</li> </ol>	Minimal. Oklahoma is already in compliance, with the exception of the address of principle residence. We currently collect both the residence address and mailing address, but state law requires the mailing address to appear on the DL/ID card. To become compliant will require change in state law and internal programming changes.	Rules will define "address of principle residence". Rules will take into account persons who reside in more than one state (i.e., "snowbirds", students), but who wish to maintain Oklahoma state as their home state.
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	None. Oklahoma is already compliant in practice (see next item).	

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Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date	Minimal, although will require changes in law, programming, and design.	Rules will not make burdensome demands on design and content.
Verification at Source: Enabling your system to electronically verify documentation with: <ol style="list-style-type: none"> <li>1. SSOLV</li> <li>2. SAVE</li> </ol>		
<ol style="list-style-type: none"> <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>	Significant. Even with the assumptions, startup and ongoing funding for equipment and personnel time will be required for Oklahoma to implement and develop interfaces to these databases.	AAMVA will develop software interfaces to others systems in the same manner as SSLOV. Federal agencies will cooperate with states. All states will provide online/electronic birth certificate verification. Third party vendors will be required by state law to provide online/electronic verification. All third party vendors will be required by state law to verify and list all persons residing at a given address (spouse, children, in-laws, boarders, etc.).
Developing access capability to SAVE system	Significant. Even with the assumptions, startup and ongoing funding for equipment and personnel time will be required for Oklahoma to implement and develop interface to these database.	AAMVA will develop software interfaces SAVE in the same manner as SSLOV.
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	Significant. With about 70 examination sites and 280 third party issuance sites, each site would need to be equipped with a system capable of capturing and digitizing these source documents. Our current DL/ID vendor has a system which complies with many requirements of the Real ID	

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	Act (verifies documents and addresses, and captures digital images) at a cost of \$10,000 per system.	
Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years	None. Oklahoma is already in compliance.	
Subject each person applying for a driver's license or identification card to mandatory facial image capture	None. Oklahoma is already in compliance.	
Establish an effective procedure to confirm or verify a renewing applicant's information	Unknown until assumptions are addressed. Non-CDL renewals are done by third parties with no on-site oversight by the state. CDL renewals are done by state Examiners, who will be able to verify CDL renewals with equipment and procedures required for initial source document verification.	Rules will define "effective procedure" and explain "confirm or verify". Will not require the issuance of a temporary license while information is verified, with a permanent license issued later from a central site.
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	Unknown until assumptions are addressed. What Oklahoma has required the applicant to resolve is now being put on the state to resolve.	Rules will address how the applicant is to be treated until discrepancy is resolved (temporary card or denied). The discrepancy can be resolved through SSA.
Check other states if a person already was issued a DL in another state	Unknown until assumptions are addressed, but probably significant.	A driver pointer system for all licensees will be developed, and all states will participate. Rules will provide detailed procedures.
Ensure physical security of locations where DL/ID cards are produced	Significant, even before assumptions are addressed. Oklahoma has 280 third party issuance sites. This requirement may cause implementation of alternate issuance procedures.	Rules will define "physical security".
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security	Significant, even before assumptions are addressed. Oklahoma has 280 third party	Rules will define "appropriate security clearance requirements".

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clearance requirements	issuance sites, with over 1,000 employees and a high rate of turnover. This requirement may cause implementation of alternate issuance procedures.	
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Significant, even before assumptions are addressed. Apparently the Real ID Act makes the assumption that document verification and DL/ID issuance are done at the same location or at least by the same entity. This is not true in Oklahoma, where DL Examiners (state employees) verify documentation and authorize issuance of the DL/ID, which is done by a third party vendor. Oklahoma has 280 third party issuance sites, with over 1,000 employees and a high rate of turnover. While DL Examiners are trained in AAMVA's FDR, the third party vendors have never had this training.	Rules will define "fraudulent document recognition training programs". Each state's training must be the same. Rules will allow document verification by state employees and DL/ID issuance by third party vendors with no on-site oversight.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	None. Oklahoma is in compliance.	
Alternative document design if it does not meet federal standard	Unknown until assumptions are addressed. However, if current document design does not meet federal standards, redesign would cause significant expense.	Rules will establish a federal standard.
Legal Presence Requirement	None. Oklahoma is in compliance.	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	Unknown until assumptions are addressed since a nationwide system already exists.	Rules will clarify how this requirement is different from the current availability with NLETS, which allows for access to any driver's driving record from any state.
Maintain a state motor vehicle database that contains	None. Oklahoma is in compliance.	

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at a minimum: <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>		
<b>Optional</b> Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	Oklahoma does not foresee implementing this option.	Rules will not require use of this option.

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

When will rulemaking be completed?

What documents will be allowed for ID?

What documents will be allowed for proof of residence and how will those documents be verified?

Will these requirements be for original, renewal and replacement DL/ID cards?

Where will funding come from?

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