

PENNSYLVANIA

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 extensive system modifications going from 35 bytes to a 125 byte field to an existing legacy system. Cost to Pennsylvania – Please refer to Exhibit A - #2.	No assumption
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> 91. Full Legal Name 92. Person’s Date of Birth 93. Person’s Gender 94. Person’s DL or ID Card Number 95. Digital Photograph of Person (and retention) 96. Person’s Address of Principle Residence 97. Person’s Signature 98. Physical Security Features to prevent tampering, counterfeiting or duplication 99. Common Machine Readable Technology: 	<ul style="list-style-type: none"> 1. Requiring the full legal name will be a challenge to fit on the existing driver’s license. 2. Pennsylvania complies 3. Pennsylvania complies 4. Pennsylvania complies 5. Eliminates all valid-without-photo products. As well, may not be able to continue using temporary camera card as a valid license. 6. Pennsylvania complies 7. Pennsylvania complies 8. Pennsylvania currently does not have an OVD in license core. 9. Pennsylvania will have to change the format of its magnetic stripe and 2D barcode. <p>Cost to Pennsylvania – Please refer to Exhibit A - #2</p>	<ul style="list-style-type: none"> 1. No assumption 2. N/A 3. N/A 4. N/A 5. Assumes that the law does not provide for religious photo exemptions. 6. N/A 7. N/A 8. Assumes that Homeland Security adopts AAMVA’s license standard. 9. Assumes that Homeland Security adopts the AAMVA standard to be used for magnetic stripes and 2D barcodes.
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	Pennsylvania already ties end of stay to license expiration.	N/A
Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date	Currently, the license expiration date coincides with the temporary INS credentials. This unique expiration date is used as a visual indicator for law enforcement. Pennsylvania	Pennsylvania’s unique expiry date identifies, for law enforcement, that the product is temporary.

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	<p>does not print “temporary” on the driver’s license.</p> <p>Cost to Pennsylvania to change existing practice – Please refer to Exhibit A - #3</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 	<ol style="list-style-type: none"> 1. Pennsylvania complies 2. Requires a robust online interactive system to support efficient processing of customers. 3. Need clarification 4. Pennsylvania does not accept other state’s license/Id cards as source identification documents. 5. Requires the development of an automated nationwide birth certificate verification system. 6. Integrate 3rd party address verification into licensing systems. <p>Cost to Pennsylvania – please refer to Exhibit A - #2 and #3</p>	<ol style="list-style-type: none"> 1. N/A 2. Assumes that SAVE information/data is up-to-date and system is robust. 3. N/A 4. None 5. Homeland Security will host/develop the automated nationwide birth certificate verification system. 6. The US Postal Service software for address verification is limited. A third party vendor could link person’s name to address.
<p>Developing access capability to SAVE system</p>	<p>Requires system modifications to support an interactive online verification. Cost to Pennsylvania – Please refer to Exhibit A - #2.</p>	<p>The SAVE system can provide sub-second response for on-line verification to all states.</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>Will need imaging equipment and system infrastructure at front line to capture, electronically transfer state-to-state, and store images. Cost to Pennsylvania – Please refer to Exhibit A - #1 and #3.</p>	<p>AAMVA will provide the infrastructure to electronically transfer images state to state. In addition, AAMVA assume the role for standardization. Standards are adopted on or before May, 2007.</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>Pennsylvania will have to acquire more electronic storage space. Cost to Pennsylvania – Please refer to Exhibit A - #2</p>	<p>None</p>
<p>Subject each person applying for a driver’s license or identification card to mandatory facial image capture</p>	<p>Pennsylvania complies with the exception of the valid-without-photo driver’s license.</p>	<p>Assumes that the law does not provide for religious exemptions.</p>

Establish an effective procedure to confirm or verify a renewing applicant's information	If acceptable to only verify social security number, the impact would be minimal. If required to verify all source documents. Cost to Pennsylvania – Please refer to Exhibit A - #1.	That social security verification will be accepted, and the social security number has already been verified through SSOLV, and the results maintained.
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	How will we determine that social security needs to provide additional information? Currently, the customer resolves discrepancies with social security prior to a product being issued. This would be impossible for the states to resolve.	Each state will only issue a product for applicants whose social security number verifies with the Social Security Administration.

Check other states if a person already was issued a DL in another state	The development of an all state non-commercial driver's license pointer system and the integration of the system into Pennsylvania's system. Cost to Pennsylvania – Please refer to Exhibit A - #2.	The all state non-commercial driver's license pointer system will be in place by the effective date.
Ensure physical security of locations where DL/ID cards are produced	Pennsylvania complies with numerous security measures such as alarms, motion detectors, back-up battery systems, etc.	N/A
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	Pennsylvania complies – criminal history checks are completed on all employees and contractors.	N/A
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Pennsylvania complies	AAMVA fraud training is acceptable.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	Pennsylvania complies – currently valid for only 4 years.	N/A
Alternative document design if it does not meet federal standard	Pennsylvania complies	In compliance
Legal Presence Requirement	Pennsylvania complies	N/A
Provide electronic access to all other states to information contained in the motor vehicle database of the state	The development of an all state non-commercial driver's license pointer system and the integration of the system into Pennsylvania's system. Cost to	The all state non-commercial driver's license pointer system will be in place by the effective date.

	Pennsylvania – Please refer to Exhibit A - #2.	
<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>Pennsylvania complies with the exception of full legal name which will require extensive system modifications to an existing legacy system. Cost to Pennsylvania – Please refer to Exhibit A - #2.</p>	<p>Does not require states to transfer driver history when transferring a license from another state.</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>Pennsylvania complies</p>	<p>N/A</p>

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

- 1. What is the implementation date? Does implementation begin in three years or must state be fully implemented (including having all customers re-credentialed) in three years?**
- 2. For the purpose of recredentialing existing driver license holders, will the verification of social security be enough?**
- 3. Will rulemaking be required?**

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

	this will be included in system modifications as a part of the system re-write (Legacy System)										
3. Changes to license document	<ul style="list-style-type: none"> • Temporary indicator for non-US citizens • DHS standardization of security features (e.g. Optical Variable Device) • Contractual costs 	\$0	\$0.05 mil	\$0.05 mil	\$0.05 mil	\$0.05 mil	\$0.05 mil	\$0.05 mil	\$0.05 mil	\$0.05 mil	\$0.35 mil
TOTAL		Legacy System Development	Legacy System Development and \$18.95 mil	Post Legacy Support and \$15.35 mil	\$15.35 mil	\$15.35 mil	\$15.35 mil	\$3.35 mil	\$1.35 mil	TOTAL \$85.05	