

TENNESSEE

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>We need clarification on the number of characters that will be allowed. We would need to convert to DB2 database as our current record and issuance programs are limited.</p> <p>The cost estimate for conversion is very roughly estimated to be between \$1 to 2 million.</p>	<p>Our current programs are limited to 12 characters for the first name, 12 characters for the middle name and 20 characters for the last name. This would not allow for the “full legal name” to be maintained on the record or be printed on the document.</p>
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> 127.Full Legal Name 128.Person’s Date of Birth 129.Person’s Gender 130.Person’s DL or ID Card Number 131.Digital Photograph of Person (and retention) 132.Person’s Address of Principle Residence 133.Person’s Signature 134.Physical Security Features to prevent tampering, counterfeiting or duplication 135.Common Machine Readable Technology: 	<p>We currently meet requirements 2 thru 8.</p> <p>On #1, as stated above, we are limited to the number of characters that we can store and print on the document</p> <p>On #9, we currently have 1D and 2D bar codes</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>This would require legislative changes including fee structure changes to set up an new classification of driving privilege. There will be minor program changes and associated costs. Approximate cost \$15,000</p>	<p>We already have a system design that allows for issuance based on documentation presented and expiration dates based on the documentation. We would need to “design” the new “temporary driver license” which would at no cost due to our stipulation in our current contract which provides for new formats without cost.</p>

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Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date	This will be handled as stated above	
<p>Verification at Source: 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. We already utilize the SSOLV system 2. We are reviewing the MOU for SAVE 3. I am in the process of obtaining information on the DEERS (DOD) and exploring how we get acces. 4. 5. Unknown to our knowledge there is no system for the electronic verification of Birth Certificates 6. This alternative will be explored, however, at this point, we do not have sufficient information to make a determination. 	
Developing access capability to SAVE system	We are exploring web based access at this time	
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>A system to fulfil this requirement would have to be procured</p> <p>Cost unknown at this time.</p>	We currently do not capture identity source documents in any manner. We are in the processing of writing an RFP for a new digitized issuance system and this might be made part of the contract.
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	We anticipate having a system for digital capture of identity source documents .
Subject each person applying for a driver’s license or identification card to mandatory facial image capture	We currently have a digitized issuance system however, legislation would be required to delete the exception.	Currently, drivers over 60 years of age are allowed to have “Valid without Photo” driver licenses

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Establish an effective procedure to confirm or verify a renewing applicant's information	This could eliminate our Internet and mail renewal programs if the rules require the documentation to be presented in person.	
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	We would need more staff at our Helpdesk to resolve these SS # issues. We would also need to receive additional information on our SSLOV inquiries.	Currently, the applicant is required to resolve any SS# discrepancy.
Check other states if a person already was issued a DL in another state	We currently electronically notify the other state that their driver is surrendering the out-of-state driver license and obtaining a TN driver license	
Ensure physical security of locations where DL/ID cards are produced	None	We feel that we currently meet this requirement to the extent possible.
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	Need a clarification on "appropriate security clearance" requirements	Currently all DOS employees including temporaries undergo a Criminal History background check. County Clerk contractors do not undergo this background check.
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	We have already began this process by getting 24 employees certified thru AAMVA's FDR Train-the-Trainer Program	We have 13 one week training sessions in the planning stages which will provide the FDR training to all our dl field personnel.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	None	We already have a basic 5 year issuance program with approval for initial issuance periods of 3 years to 7 years as needed to get the driver on a renewal cycle on his/her birthday in a year divisible by 5 ie 25, 30
Alternative document design if it does not meet federal standard	None	We currently have the CFD design

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Legal Presence Requirement	None	We are currently more stringent than this requirement as we require proof of U.S. Citizenship or Lawful Permanent Residency for qualification for a TN Driver License or Photo Identification Only License
Provide electronic access to all other states to information contained in the motor vehicle database of the state	This would require some major programming changes estimated at \$200,000 to \$300,000	
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 	None	We currently meet and exceed this requirement
Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	None	We implemented the Certificate for Driving program in July, 2004

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

Need further clarification on the following:

1. What constitutes an appropriate security clearance? We currently do Criminal History checks on our employees and potential employees can be disregarded if they have certain convictions on their criminal history.

Will there be a set of standard convictions that will prohibit a person from working for or contracting with driver license

Issuance?

**2. What is the criteria for an effective procedure to confirm or verify a renewing applicant's information?
Will we have to discontinue our Internet and Mail transactions and require that every driver come into a driver license station or will alternative methods be considered?**

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