

# VERMONT

## Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)	This will require a system redesign. We currently can only capture 25 characters for an applicant's name.	We are currently in the process of getting a contract for a new online system. Expanding the number of characters we can capture will be part of the design.
<p>Have following data elements/features on the document:</p> <ul style="list-style-type: none"> <li>145.Full Legal Name</li> <li>146.Person's Date of Birth</li> <li>147.Person's Gender</li> <li>148.Person's DL or ID Card Number</li> <li>149.Digital Photograph of Person (and retention)</li> <li>150.Person's Address of Principle Residence</li> <li>151.Person's Signature</li> <li>152.Physical Security Features to prevent tampering, counterfeiting or duplication</li> <li>153.Common Machine Readable Technology:</li> </ul>	<ol style="list-style-type: none"> <li>1. We capture up to 25 characters.</li> <li>2. Yes</li> <li>3. Yes</li> <li>4. Yes</li> <li>5. Yes</li> <li>6. We capture the applicant's <u>mailing</u> address.</li> <li>7. Yes</li> <li>8. Yes</li> <li>9. The Bar Code on our licenses/permits meet the minimum AAMVA standards. Everything that is on the front of the license is in the bar code with the exception of the signature and photo.  The Mag Stripe does not meet the minimum AAMVA standards. The Mag Stripe contains only the name, Date of Birth, height and weight.</li> </ol>	<p>Regarding #1 - If the Real ID Act is similar to the DL/ID Security Framework which proposes that we have room to capture 100 characters for an individual's full legal name, it will be <u>impossible</u> for use to do this with our current system. We would not be able to implement this data element/feature until we get a new system.</p> <p>Regarding #6 – We question what is AAMVA's and Real ID's definition of "Principal Residence". Vermont has definitions for both Mailing and Legal Addresses, however, they may or may not meet those required in this Act.</p> <p>Regarding #9 – We question whether or not our Bar Codes and Mag Stripes meet AAMVA's and/or Real ID's standards.</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)	We do not issue "Temporary Licenses", however, the expiration date of the license is tied to the end of stay.	If forced to issue "Temporary Licenses", it may require the passage of legislation.
Amending card design to show/indicate that it is a	As indicated above, we do not issue temporary	This would require a redesign of our license or the

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temporary document with a “different than usual” expiration date	licenses. The expiration date is the end of stay date.	creation of a new license. This would be very costly and may require the passage of legislation.

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<p>Verification at Source: Enabling your system to electronically verify documentation with:</p> <ol style="list-style-type: none"> <li>1. SSOLV</li> <li>2. SAVE</li> <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>	<ol style="list-style-type: none"> <li>1. SSOLV – We are almost done with this and will be implemented within a month or two.</li> <li>2. SAVE – We do not use this system.</li> <li>3. DEERS (DOD) – We do not use this system.</li> <li>4. Other jurisdiction (DL/ID card) – We collect Driver Licenses from other jurisdictions and we periodically send them back to those jurisdictions, who would then mail us paper copies of their driving record. We would then take action if a suspension exists in that jurisdiction.</li> </ol> <p>We also perform PDPS checks for Non-Commercial Vehicle License applications and CDLIS checks for Commercial Vehicle License applications.</p> <ol style="list-style-type: none"> <li>5. We accept only the original Birth Certificate or a certified copy of the Birth Certificate.</li> <li>6. N/A</li> </ol>	<p>The SAVE and DEERS (DOD) systems would be a big issue. We do not have the funds or personnel to implement these systems. It would require the hiring of contractors to implement these systems. It would also require the dedication of personnel to work on these systems with the contractors until the systems are implemented. In return, temporary employees would need to be hired to replace those employees dedicated to this project.</p>
Developing access capability to SAVE system.	Big issue. We do not have the funds or the personnel to pursue implementing this system.	We do not have the funds or personnel to implement this system. It would require the hiring of contractors to implement this system. It would also require the dedication of personnel to work on this system with the contractors until the system is implemented. In return, temporary employees would need to be hired to replace those employees dedicated to this project.
Introduce equipment into system to capture digital images of identity source documents so that images can be	Documents/images are non-transferable. They can be seen from our in-house PC’s, but are not transferable	This would require an entirely new imaging system than the one we currently have. We do not have the funds to

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retained in electronic storage in a transferable format	outside of the Department.	purchase a new system that would allow our documents/photos to be digitally transferable.
Retain paper copies of source documents for a minimum of 7 years or images of source documents presented for a minimum of 10 years	We currently do this. Source documents are imaged then are placed in storage.	
Subject each person applying for a driver's license or identification card to mandatory facial image capture	We are now a mandatory license state, therefore, we capture an individual's facial image when they <u>obtain</u> a Driver's License/Permit/ID Card.	We question what is meant by "applying". Is AAMVA/Real ID requiring us to capture a facial image if, for example, an applicant takes an exam and fails, therefore not obtaining a License/Permit?
Establish an effective procedure to confirm or verify a renewing applicant's information	We currently require 2 forms of ID for License/Permit renewals. The applicant's current License/Permit serves as 1 form of ID and the 2 <sup>nd</sup> form of ID is a document that is on AAMVA's list of acceptable ID's.	
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 feel that the customer should be responsible for resolving any SSN discrepancies.	If we were required to do this, we would need additional personnel, as it would take a lot longer to process a license application. We do not have the funds for additional personnel.
Check other states if a person already was issued a DL in another state	We currently use PDPS and CDLIS for checking what other states the applicant was previously licensed.	It is possible that we would need the DRIVERs system for this. If so, we do not have the funds or personnel to implement this system. It would require the hiring of contractors to implement this system. It would also require the dedication of personnel to work on this system with the contractors until the system is implemented. In return, temporary employees would need to be hired to replace those employees dedicated to this project.
Ensure physical security of locations where DL/ID cards are produced	Our materials for making a License/Permit/ID are kept in locked cabinets/drawers.	
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance	This is a <u>huge</u> issue. The Vermont State Employees Association (Union) may not wish to have their	We would mostly likely need VSEA's approval as well as a Departmental Policy.

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requirements	members undergo background checks.	
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	We currently do fraudulent ID training.	
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	We currently do this. The maximum renewal period for a License is 8 years.	
Alternative document design if it does not meet federal standard	We have our own design.	If we have to redesign our Licenses/Permits/ID's, it would be a <b>huge</b> financial impact.
Legal Presence Requirement	We only collect a "legal address" when the individual's address is a Post Office Box. The "legal address" is usually the 911 address.	We question exactly what is AAMVA's/Real ID's definition of "Legal Presence". Does it match our definition of "legal address"?
Provide electronic access to all other states to information contained in the motor vehicle database of the state	Other states are able to access our records via PDPS and CDLIS.	
Maintain a state motor vehicle database that contains 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>	We currently do this.	
<b>Optional</b> Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	We issue Driver Licenses and Permits to anyone. We only issue Non-Driver ID's to Vermont Residents.	What is the definition of Federal identification purposes?

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

1. By what date are states required to implement the Real ID Act?
2. What are the consequences should we not meet the required implementation date?
3. Will Federal funds be made available to implement the Real ID Act?

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

We prepared a Cost Analysis Template which we have enclosed.