

# VIRGINIA

## Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)		
Have following data elements/features on the document: <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>	<ol style="list-style-type: none"> <li>1. System and card format will need to be redesigned to accommodate space for full legal name on DL/ID.</li> <li>2. Full compliance – No impact</li> <li>3. Full compliance – No impact</li> <li>4. Full compliance – No impact</li> <li>5. Full compliance – No impact</li> <li>6. Statutory changes necessary to disallow the use of a mailing address to show on the DL/ID.– will eliminate current “stalking protection law”</li> <li>7. Full compliance – No impact</li> <li>8. No impact</li> <li>9. Full compliance – No impact</li> </ol>	<ol style="list-style-type: none"> <li>1. Most complete version of applicant's name as displayed on proof documents will be used.</li> <li>2.</li> <li>3.</li> <li>4.</li> <li>5.</li> <li>6. Assume the license must show the actual physical address of the holder's residence.</li> <li>7.</li> <li>8. New VA DL/ID (Fall of 2006) will conform to guidelines established by AAMVA.</li> </ol>

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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>Statutory, system, policy, and procedural changes would be necessary to include renewals and formerly *‘‘grandfathered’’ applicants.</p> <p>*Any individual who held a driver’s license on January 1, 2004 was not required to provide proof of legal presence unless their license expired or was suspended, cancelled, revoked.</p>	
Amending card design to show/indicate that it is a temporary document with a ‘‘different than usual’’ expiration date	System and card design changes will be necessary to ‘‘clearly’’ display the ‘‘different than usual’’ expiration date.	DMV’s current practice of displaying a restriction code that is defined on the back of the license will need to be revised.
<p>Verification at Source:</p> <p>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>	<p>If DMV is not able to electronically verify documentation presented, and is therefore, required to verify documentation manually, there will be a significant impact on staffing needs. This would cause an increase in costs.</p> <p>1. System changes would be necessary if DMV is able to electronically verify that an applicant has not been issued a SSN.</p> <p>Legislative change would be necessary to collect SSN for ID card issuance.</p> <p>Increased cost if DMV is required to verify SSNs for holders of ID cards as well as DLs.</p>	<p>1. Legislative change would be needed to capture SSN of ID holders – this is currently prohibited by Federal law.</p>

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	<p>2. Increased cost with increased SAVE verifications sent and to cover required system changes.</p> <p>Increase in staff required to send and analyze responses.</p> <p>Increase in customer wait time, as not all inquiries sent will receive an immediate response – response may not be available for days.</p> <p>Current MOU will need to be revised.</p>	<p>2. All foreign-born applicants would need to be verified through SAVE before being issued a DL/ID.</p>
	<p>3. System changes</p> <p>DMV would need to enter into a MOU</p>	<p>3.</p>
	<p>4. Increased costs for system changes and for use of the DRIVERs program.</p> <p>DMV would need to enter into a MOU</p>	<p>4. DRIVERs will need to be operational before this provision can be feasibly implemented.</p>
	<p>5. System changes</p> <p>DMV would need to enter into a MOU</p>	<p>5.</p>
	<p>6. System changes</p> <p>DMV would need to enter into a MOU</p>	<p>6. Real ID provisions will allow for verification through third party vendors rather than the document source.</p>
<p>Developing access capability to SAVE system</p>	<p>See response to #2 above</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>Increased costs for scanning equipment, system changes, and additional personnel will be incurred.</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>Increased costs for additional electronic storage space.</p>	
<p>Subject each person applying for a driver’s license or identification card to mandatory facial image capture</p>	<p>Full compliance – No impact</p>	

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
<p>Establish an effective procedure to confirm or verify a renewing applicant's information</p>	<p>Renewal through alternative methods will be eliminated.</p> <p>New facilities and additional staff will be necessary for verification of documentation presented by all applicants (whether original or renewing)</p> <p>Statutory and system changes would be necessary to require proof documentation for all renewals as well as original DMV documents.</p>	<p>Strict interpretation of the requirement – All renewals must be verified to include the first renewal after the effective date of this act and all subsequent renewals.</p>
<p>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</p>	<p>Statutory change to require SSNs for ID cards.</p> <p>Increased cost of SSN verifications with increased volume to send.</p> <p>Additional staff to handle SSN discrepancies.</p> <p>Will need to revise current MOU.</p>	<p>Stopping the transaction and not issuing a DL/ID is not enough to resolve the SSN discrepancy. The Agency must actually resolve the discrepancy.</p>
<p>Check other states if a person already was issued a DL in another state</p>	<p>Increased costs for system changes and for use of the DRIVERs program.</p> <p>If DRIVERs is not available, a significant number of additional staff would be required to check with other states to see if a person was already issued a DL elsewhere.</p>	<p>AAMVA DRIVERs will need to be operational to feasibly implement this provision.</p>
<p>Ensure physical security of locations where DL/ID cards are produced</p>	<p>No impact</p>	<p>These issues will be addressed through implementation of DL Central Issue – expected in the Fall of 2006.</p> <p>Security requirements will be written into the vendor contract.</p>

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Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	Increased costs for background checks of DMV staff.	All employees of CSCs or HQ work areas that handle any portion of the licensing process will be required to have background checks done.  The requirement for background checks for vendor employees will be written into the vendor contract.
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	Increased cost to implement training program and to provide on-going training– could cause increased wait times and/or require additional staff as the employees are pulled from CSCs	All employees involved in the review of customer documentation will be trained.
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	Full compliance – No impact	
Alternative document design if it does not meet federal standard	Card redesign System changes MOU with vendor would need to be revised. Statutory changes	
Legal Presence Requirement	Statutory, system, policy, and procedural changes would be necessary to include renewals and formerly **"grandfathered" applicants.  *Any individual who held a driver's license on January 1, 2004 was not required to provide proof of legal presence unless their license expired. Or was suspended, cancelled, revoked.	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	System changes would be necessary to comply with data exchange elements between states.	DRIVERs

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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>	Full compliance – No impact	
<b>Optional</b> Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	Statutory and system changes. Would need to revise MOU.	

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

Must DMV verify/confirm documentation for **EVERY** renewal applicant? Or, is it sufficient to verify/confirm documentation for each applicant the first time they renew after the effective date of this act?

With the exception of this question, we feel it is too early to identify other questions as they would depend on what is required by the regulations.

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

**See attached**

Potential Impact of Federal Real ID Act on Virginia DMV					
Scenario	One-Time Costs	Recurring (Annual) Costs <sup>1</sup>	FTEs Needed	Number of New Facilities Needed	Impact on Average Customer Wait Time
<b>Scenario 1: Separate DL/ID Centers/On-site Document Verification</b> <ul style="list-style-type: none"> <li>• All DL/ID customers must present documents every time</li> <li>• Separate field DL/ID Centers would be established</li> </ul>	\$136,052,481	\$62,739,946	1,464	40	No Impact

<sup>1</sup> If regulations require renewal customers to only provide proof documents one time, recurring annual costs drop after 7 years.

<ul style="list-style-type: none"> <li>• All document verification conducted at the field DL/ID Centers</li> <li>• Construction of 40 new facilities and addition of 1,464 field and call center staff</li> </ul>					
<b>Scenario 2: Two-Step Process with Headquarter Verification</b> <ul style="list-style-type: none"> <li>• All DL/ID customers must present documents one time only</li> <li>• All document verification conducted centrally</li> <li>• No increase in number of facilities or field staff; headquarters staff would increase by 111</li> </ul>	\$2,268,049	\$5,212,704	111	0	19% increase in average wait time (from approx. 20 minutes to 24 minutes on average)
<b>Scenario 3: Two-Step Process with Customer Choice and Headquarters Verification</b> <ul style="list-style-type: none"> <li>• DL/ID customers must present documents one time only; assumes 70% of customers obtain “compliant” DL or ID</li> <li>• All document verification conducted centrally</li> <li>• No increase in number of facilities or field staff; headquarters staff would increase by 77</li> </ul>	\$2,207,119	\$3,797,351	77	0	13% increase in average wait time (from approx. 20 minutes to 23 minutes on average)
<b>Scenario 4: Real ID in Today’s</b>	\$2,384,762	\$803,519	0	0	258% increase in

<b>Environment</b> <ul style="list-style-type: none"><li>• All DL/ID customers must present documents every time</li><li>• All document verification conducted at the CSCs</li><li>• No increase in number of facilities or staff</li></ul>					average wait time range 1 hour and 11 minutes to 24 hours and 57 minutes
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