

WISCONSIN

Jurisdiction Impact Analysis Real ID Act

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Introduce Full Legal Name into Driver Licensing System (in Record, on Document)	WI does not require full legal name, and does not print full middle name on document.	Full legal name includes full middle name
Have following data elements/features on the document: <ul style="list-style-type: none"> 163.Full Legal Name 164.Person’s Date of Birth 165.Person’s Gender 166.Person’s DL or ID Card Number 167.Digital Photograph of Person (and retention) 168.Person’s Address of Principle Residence 169.Person’s Signature 170.Physical Security Features to prevent tampering, counterfeiting or duplication 171.Common Machine Readable Technology: 	WI does not print full legal name on document. Wi uses digital facsimile of signature WI appears to be in compliance with other provisions	Common machine readable technology will not include biometric data Digital facsimile of signatures will be permitted
Introduce temporary DL/ID cards and tying end of stay to expiration of DL/ID card (or issuance for no more than 1 year)	Wisconsin must make extensive programming changes to create a temporary driver’s license and change business rules that compute expiration dates.	Temporary license will be a new product type
Amending card design to show/indicate that it is a temporary document with a “different than usual” expiration date	Requires a new product type	Temporary license will be a new product type
Verification at Source:	WI just implemented SSOLV, but doesn’t have any other	Unclear what DEERS system is used for.

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<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 	<p>systems to verify information electronically.</p>	
<p>Developing access capability to SAVE system</p>	<p>WI does not use the SAVE system, and must do extensive programming to link to the system.</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>WI does not capture digital images of source documents. All equipment must be purchased. Initial cost estimates indicate that placing equipment in all field stations will be cost prohibitive. WI may have to close some itinerant field stations, especially if there are no federal funds available. Also, it is unclear if customers renewing their DL/ID will have to provide source documents.</p>	<p>All field stations that issue driver's licenses and identification cards must have equipment.</p> <p>Customers applying for duplicate, occupational, reinstated license, etc, will not have to supply source documents.</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>Since identity source documents must be kept in an electronic format, all source documents will be kept in an electronic format.</p> <p>WI does not capture digital images of source documents. All equipment must be purchased. Initial cost estimates indicate that placing equipment in all field stations will be cost prohibitive. WI may have to close some itinerant field stations, especially if there are no federal funds available. Also, it is unclear if customers renewing their DL/ID will have to provide source documents.</p>	<p>All field stations that issue driver's licenses and identification cards must have equipment.</p> <p>Customers applying for duplicate, occupational, reinstated license, etc, will not have to supply source documents.</p>
<p>Subject each person applying for a driver's license or identification card to mandatory facial image capture</p>	<p>WI does not photograph persons who are denied. WI will have to reconfigure application process so photograph can be taken first.</p>	<p>Applicants must be photographed at the beginning of the process.</p>

REAL ID ACT REQUIREMENT	IMPACT	ASSUMPTIONS
Establish an effective procedure to confirm or verify a renewing applicant's information	It is unclear what this means. How do you verify information for a renewing customer? Do they have to provide all of their source documents?	
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	WI has procedures for handling discrepancies with Social Security number for Wisconsin residents, but has no way of checking other states unless a centralized database or pointer system is created.	A centralized database for driver information will be built, which includes social security numbers.
Check other states if a person already was issued a DL in another state	WI checks states where the driver was previously licensed. No nationwide search is done.	
Ensure physical security of locations where DL/ID cards are produced	It is unclear what is meant by "physical security". This could lead to station remodeling or central office issuance.	
Subject all person's authorized to manufacture or produce DL/ID cards to appropriate security clearance requirements	WI does background checks on new employees. Existing employees and employees of vendors would have to be checked.	Applies to vendor employees as well.
Establish fraudulent document recognition training programs for appropriate employees engaged in the issuance of DL/ID cards	WI has a fraudulent document training program for field staff. This must be expanded to include central office staff.	
Limit period of validity of DL/ID cards that are not temporary to a period not exceeding 8 years	In compliance	
Alternative document design if it does not meet federal standard	WI must decide if the alternate document is going to be issued.	
Legal Presence Requirement	WI does not have legal presence. Statutory language is needed, and transactions will take longer to process.	
Provide electronic access to all other states to information contained in the motor vehicle database of the state	WI does not have system to provide electronic access to other states. Extensive programming is needed to link to a centralized database.	A centralized driver pointer system will be built.

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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 	WI is in compliance.	ISO standards, which require data fields to be numbered, will not be used.
Optional Development and issuance of a certificate of driving – not for federal identification purposes – for those who cannot prove lawful presence.	WI must decide if the alternate document is going to be issued. We currently license people without legal presence.	

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

- What is the definition of compliance with the Act? In three years, does Wisconsin have to re-issue all driver’s licenses and identification cards? Or, will Wisconsin be in compliance if all driver’s licenses and identification cards issued three years after passage meet the requirements of the Act?
- Are ALL applicants (including renewals, duplicates, reinstatements, reissues, changing restrictions or authorities) required to show documentary evidence of identity, date of birth, Social Security #, residency and proof of lawful status? How do you prove citizenship? Also, can we continue current practice of issuing driver’s licenses to military personnel overseas?
- How do you verify documents with issuing agencies of documents? If the issuing agency is not a government agency, it will be difficult to verify information without violating the federal Driver Privacy Protection Act.
- Will a central clearinghouse for data be created?
- Can a renewal applicant use a birth certificate on file to prove identity and date of birth?
- There is a distinction between identity source documents and other source documents for document storage. Is that intentional? (Identity source documents must be kept in an electronic format; other source documents could be paper or electronic.) Do documents have to be stored in color format, or is black and white sufficient? Does the application have to be stored as well?

- What is definition of full legal name? Will AAMVA standard be used? How do you handle people with more than one legal name? (For example, a married woman that uses her maiden name professionally, but her married name for everything else).
- Will the federal rules require specific standards for photographs, similar to passports? What about religious and temporary deformity exemptions for photographs?
- Is digital facsimile of signature on driver's license or identification card acceptable?
- Does the facial image capture of all applicants have to be done as the first step in the application process?
- What is considered an "effective procedure" to verify or confirm a renewing applicant's information?
- What are the security clearance requirements for employee background checks? Does this apply to vendors that produce DL/ID card stock as well?
- What is the definition of "physical security" for locations where driver's licenses and identification cards is produced?
- Will the federal rules use AAMVA standards whenever possible? If so, Wisconsin has a much better chance of being in compliance.
- What impact will REAL ID have on international driver's licenses treaties and reciprocal agreements with Germany, Switzerland, and Mexico? Federal law cannot override international treaties.
- What are minimum data elements for common machine technology? Will biometric data be included?
- How are false DL/IDs handled? Are they confiscated? Do you notify the issuing agency or Department of Homeland Security?
- Grant money is needed for vital records agencies in addition to motor vehicle agencies.
- How long of an extension will the Department of Homeland Security grant to meet the requirements of Section 202 (1)(a)?
- When will federal rulemaking begin? How long will it take to complete?
- Why is MOU needed to utilize SAVE system required by September 11, 2005? States have 3 years to comply with other requirements of the act, and Wisconsin must do extensive programming to link to the system.
- What happens to Wisconsin residents during the transition time, ie, after REAL ID is implemented, but before their license expires? If they need to board a plane, do they have to get a new license?
- Will centralized database or national driver pointer system be created to satisfy requirement that all state motor vehicle databases provide electronic access to all other States? Will database include birth and death record information as well?

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

COST SUMMARY OF MAJOR ITEMS IN REAL ID

Assumptions used

Duplicates, occupational licenses, reinstatements, etc will not be impacted by REAL ID. No additional transaction time will be incurred.

All manual document verification would be done in central office, and licenses/ID cards would be issued here as well. Viisage would likely re-negotiate contract for central office issuance; no cost estimate available at this time.

This summary only include major cost items in REAL ID. Costs will be incurred for other items, such as employee background checks, transaction costs for new computer systems, station remodeling costs, etc.

Once source documentation is on file, renewal applicants will not have to re-verify information.

Implementation will be phased in over eight year renewal cycle.

One-time Programming Costs

Change expiration dates to issue temporary licenses, do programming for document scanning, and add links to SAVE & DRIVeRS,	\$ 1,503,350	1651 days BITS estimate, plus vendor charges
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One-time Equipment and Software Costs for Document Verification and Scanning*	Equipment & Software Costs	Programming Costs	Total One-time Costs
Consolidated model (8 stations, statewide)**	\$ 722,500	\$ 1,503,350	\$ 2,225,850
Five-day stations only (29 stations)	\$ 2,367,500	\$ 1,503,350	\$ 3,870,850
5 day stations, plus travel teams (29 stations + 21 teams)**	\$ 2,916,000	\$ 1,503,350	\$ 4,419,350

*All models assume that some low-volume, itinerant driver licensing sites would close, optimizing remaining sites.

**Consolidated model CAN NOT be used if all original & renewal applicants must be checked.

Ongoing Software Licensing Costs (Annually)***

Regional model (8 stations, statewide)	\$ 88,350
Five-day stations only (29 stations)	\$ 285,350
5 day stations, plus travel teams (29 stations + 21 teams)	\$ 491,550

***Document libraries for verification systems must be updated semi-annually, plus licensing costs for document scanning and document viewing software

Ongoing FTE, Salary & Fringe (Annually)

	Manual verification of documents**** (Minutes per unit = 30)		Combination of manual/automated verification of documents**** (Minutes per unit= 20)		Automated verification of documents**** (Minutes per unit = 10)	
	FTE	Salary/Fringe	FTE	Salary/Fringe	FTE	Salary/Fringe
All applicants (original & renewal)*****	227.2	\$ 8,698,300	151.4	\$ 5,992,718	75.7	\$ 3,287,135
Original applicants only	60.4	\$ 2,196,941	55.4	\$ 2,192,675	27.7	\$ 1,202,730
Non-citizens only	20.4	\$ 782,847	13.6	\$ 539,345	6.8	\$ 295,842

****Any manual verification of documents would be done in central office, resulting in central office issuance. No centralized, nationwide driver database exists at this time. It will take a significant programming effort to create such a system. If verification were fully automated, customers may be issued DL/ID at field stations, if physical security of DL/ID could be ensured.

*****After eight years, FTE costs would decrease if renewal applicants that are citizens do not have to re-verify information.