

REAL ID ACT IMPACT ANALYSIS

Aggregate Result

September 2006

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American Association of Motor Vehicle Administrators
National Conference of State Legislatures
National Governors Association

Part One

System Impacts

Introduction

Over the spring and summer of 2006, the American Association of Motor Vehicle Administrators (AAMVA), National Governors Association (NGA) and National Conference of State Legislatures (NCSL) undertook a detailed survey of state motor vehicle agency officials to estimate the potential costs of complying with The Real ID Act. The surveys included approximately 114 multi-part questions and required 6-8 weeks to complete. Since the Department of Homeland Security (DHS) had yet to publish regulations to guide state estimates, the surveys relied on the earlier state recommendations made to DHS and information from ongoing discussions with the federal government to establish baseline assumptions. Responses were completed by 47 of 51 polled jurisdictions. These 47 jurisdictions represent 89.6% of all state issued driver license and identification (DL/ID) cards. What follows below are the aggregated responses received from survey respondents. Readers should keep in mind that, a) all 54 U.S. jurisdictions did not participate in the survey, and b) that each respondent did not answer every question.

Because some provisions will affect jurisdictions differently depending on their size, the results for several questions are given for small, medium, and large jurisdictions. Small jurisdictions are those who have less than two million DL/ID card holders, medium jurisdictions have two million to five million, and large jurisdictions have over five million.

Full Legal Name

1. If you have a contract supporting your license issuance process, on what date does it expire?

Total number of jurisdictions responding to this question: 31

Expiration before May 11, 2008	13 jurisdictions
Expiration between May 12, 2008 – December 31, 2009	10 jurisdictions
Expiration on or after January 1, 2010	8 jurisdictions

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<u>Expiration Year</u>	<u>Number of jurisdictions</u>
2006	2
2007	7
2008	8
2009	6
2010	4
2011	1
2012	2
2013	1

2. Describe how your current system handles these items:

- Number characters for name field:

Total number of jurisdictions responding to this question: 39

Length name field \leq 39 characters	18 jurisdictions
Length name field 40 - 124 characters	15 jurisdictions
Length name field \geq 125 characters	6 jurisdictions

- Truncation protocol utilized (e.g. CDLIS, ICAO, etc.)

Total number of jurisdictions responding to this question: 34

CDLIS protocol used for truncation of name	12 jurisdictions
Other protocol used for truncation of name	15 jurisdictions
No protocol used for truncation of name	7 jurisdictions

- Separate field capturing truncated name?

Total number of jurisdictions responding to this question: 36

Jurisdictions that have a separate field for capturing truncated name:	11
Jurisdictions that do NOT have a separate field for capturing truncated name:	25

- Separate field for AKA name tracking?

Total number of jurisdictions responding to this question: 38

Jurisdictions that have a separate field for tracking of AKA name:	24
Jurisdictions that do NOT have a separate field for tracking of AKA name:	14

3. Describe the changes your issuance system would require to conform:

Because data is jurisdiction specific, it is not included in this aggregate report.

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4. Based on the above, what are the estimated time and costs to implement the required system changes?

A total of 42 jurisdictions responded with at least partial estimates for the cost of these changes. Since it this change impacts IT systems, business processes, and on-going operations, not all responders could provide estimates in all these areas.

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Number of jurisdictions	16	13	13
Total cost	\$48,300,108	\$37,260,921	\$156,181,405
Total program hours	99,114	74,578	932,460

5. Identify if/how these costs would change from the above, if at all, for the implementation of a 175 character name field, as DHS may propose?

For the 33 jurisdictions that currently have less than 125 characters, the costs to change to 175 will be the same as the cost to change to 125 characters. For the 6 jurisdictions that currently have 125 or more characters, they will have to incur additional costs to meet the 175 character limit.

6. Are there other systems with which you interface that rely on a name field match that would be affected by the above change?

– If so, which system(s) (e.g. Board of Elections per HAVA, Courts, etc.)?

<p>Common Systems Affected:</p> <p>Boards of Elections</p> <p>Child Support monitoring agencies</p> <p>Courts / Jury Pools</p> <p>Financial support systems</p> <p>Game and Fish Departments</p> <p>Homeland Security verification systems</p> <p>Insurance Companies</p> <p>Organ Donor Registries</p> <p>Police/Highway Patrol</p>	<p>Secretary of State</p> <p>Social Security Administration verification systems</p> <p>Third Party verification systems</p> <p>Transportation/Public Works Department</p> <p>US Selective Service</p> <p>US State Department Passport verification systems</p> <p>Veterans Affairs</p> <p>Vital Records verification systems</p>
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– If so, what additional changes would you need to undertake to resolve this?

Because data is jurisdiction specific, it is not included in this aggregate report.

7. Are there other systems which utilize your data which might be affected by the above change?

– If so, which system(s) (e.g. NADA, etc.)?

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Because data is jurisdiction specific, it is not included in this aggregate report.

- If so, what additional changes would you need to undertake to resolve this?

Because data is jurisdiction specific, it is not included in this aggregate report.

8. Estimate any costs of changes above and beyond those in the matrix above to allow interfaces with other systems.

Because data is jurisdiction specific, it is not included in this aggregate report.

Card Design Specifications

9. Per the assumptions, what changes/additions would your jurisdiction need to make to the DL/ID card design related to: (describe substance of change needed):
 - Human Readable Elements in Card Design (Annex A)
 - Physical Security Features (Annex B)

Because data is jurisdiction specific, it is not included in this aggregate report.

10. What are the estimated system costs and time required to design, procure and implement the revised card to meet the AAMVA specifications for human readable elements and physical security features.

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$98,773,451	\$320,090,451	\$657,789,514
Total program hours	6,920	9,548	8,090
Number of Jurisdictions responding	14	11	11

Assuming the PDF barcode would have to contain at least the 125 character full legal name, date of birth, gender, DL/ID number, and potentially the digital photograph and/or digital signature:

11. Describe how your current system handles these items: **Jurisdiction response:**
 - a. Use a PDF417 2D barcode? **33** Yes **4** No
 - b. If yes, items encoded in barcode:
 - Name with average characters? **32** Yes **1** No
 - Average number of characters **44.6**
 - Date of Birth? **32** Yes **1** No

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– Gender?	30	Yes	2	No
– DL/ID number?	32	Yes	32	No
– Digital Photo?	2	Yes	29	No
– Digital Signature?	1	Yes	30	No

12. What are the estimated costs and time required for changes/additions your jurisdiction would need to make to the above DL/ID card design related to the PDF 2D Barcode, in the following scenarios:

Of the 37 jurisdictions that responded, only 9 were sure that they could fit all of the required information into their bar code. Another 10 indicated they could include either the photo or the signature, but not both. The remaining 18 indicated that would need to confer with their card system vendor. For those that could accommodate either the photo or signature or both, the costs are included in the estimates in question 10.

The Department of Homeland Security has indicated it is considering certain mandatory license security features in lieu of the AAMVA standards:

13. Indicate which of the following license features your jurisdiction currently uses:

	Jurisdiction response			
– polycarbonate card stock.	1	Yes	36	No
– intricate, fine-line, multicolor background design produced via offset lithography to include micro-line printing and an intentional error field check (NOT dye sublimation)	11	Yes	25	No
– serial/inventory number on the card stock	9	Yes	27	No
– optically variable feature – ink and/or diffraction grating (e.g. statement that valid for official use)	27	Yes	9	No
– UV (long wave) responsive feature	28	Yes	8	No
– personalization of some information via laser engraving to include tactile features and micro-line printing specific to the bearer	6	Yes	30	No
– check digit numbers or letters	9	Yes	27	No
– revision date printed or engraved on the card surface to be updated any time the card design changes	4	Yes	32	No

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14. What is your/your vendor's estimate of the cost and time to issue DL/ID's with all eight requirements above?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$131,077,818	\$170,047,948	\$215,673,039
Number of jurisdictions answering	14	12	11

These figures include the total one-time and ongoing costs of issuing a card that includes all of the features described in Question 13 and as many of the data elements listed in Question 11 as the state could include (see response to Question 12.)

Non-Conforming License:

The REAL ID Act requires DL/ID's that do not satisfy the federal requirements must clearly state on its face that it may not be accepted by any Federal agency for federal identification or any other official purpose; and must use a unique design or color indicator to alert Federal agency and other law enforcement personnel that it may not be accepted for any such purpose.

15. Does your jurisdiction plan to issue REAL ID conforming DL/ID's?

All 47 jurisdictions that responded indicated that they planned to issue Real ID conforming DL/ID Cards.

16. Does your jurisdiction plan to issue a separate license/ID that does not meet the federal requirements?

Yes: 11 jurisdictions
 No: 30 jurisdictions
 Not Sure: 3 jurisdictions

17. If yes to both above, what are the estimated incremental system costs and time for the non-conforming license design and procurement above and beyond the REAL ID costs elsewhere in this survey:

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$3,277,644	\$17,754,688	\$47,169,347
Total program hours	7,390	12,291	5,560
Number of jurisdictions answering	4	5	7

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Lawful Presence Requirements

18. Is there a measurable cost to your jurisdiction for adding an additional restriction/endorsement code on the front with explanation on the reverse of the DL/ID (like the current “eyeglasses required” type code)? If so, please indicate.

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$17,862,081	\$3,935,770	\$3,045,682
Number of jurisdictions responding	15	12	7

19. If, instead of a restriction code, a separate DL/ID with separate markings on its face was required, what are the estimated system time and cost requirements for this separate license type.

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$15,119,380	\$17,050,992	\$4,453,250
Number of jurisdictions responding	15	12	8

20. Do you currently limit the license/ID duration for aliens to approved length of stay?

Of the 50 jurisdictions that responded, 27 answered Yes and 23 answered No.

21. What are the estimated time and cost for your jurisdiction to implement a non-standard expiration date to coincide with the authorized length of stay?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$11,422,458	\$2,900,586	\$1,612,150
Number of jurisdictions answering	13	13	8

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Verification of Eligibility

The Act requires jurisdictions to verify, with the issuing agency, the issuance, validity and completeness of documents required to be presented.

Aggregate information for all verification programs combined

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$136,315,688	\$61,621,686	\$209,567,385
Total program hours	94,865	222,511	88,630
Number of jurisdictions responding	16	15	13

22. Do you current use Social Security Online Verification system (SSOLV)?

46 jurisdictions currently use SSOLV. These include: 17 small, 14 medium, and 15 large jurisdictions.

23. If yes, is your access via batch or on-line processing?

Of the 42 jurisdictions that use SSOLV and answered this question, 27 use on-line processing and 15 use batch processing.

24. What would be the estimated time and cost for your jurisdiction to integrate on-line SSOLV verification, assuming SSOLV is fully developed, funded and accessible to the States (check and answer for whichever of the following scenarios is applicable):

- Connect to the application via AAMVAnet
☐
- Develop your own connection to the application
☐

Of the 31 jurisdictions which responded, 29 indicated they would use AAMVAnet. Jurisdictions were unable to provide separate cost data for the development work necessary to connect to each of the various systems needed to verify eligibility

25. Do you currently use Systematic Alien Verification for Entitlements system (SAVE)?

Of the 47 jurisdictions, 19 states currently use SAVE.

26. If yes, is your access via batch or on-line processing?

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Of the 19 which use SAVE, 18 use on-line processing and one uses batch processing.

27. If yes, what percent of your transactions require additional processing beyond the first inquiry?

Because data is jurisdiction specific, it is not included in this aggregate report.

28. What would be the estimated time and cost for your jurisdiction to integrate on-line SAVE verification, assuming SAVE is fully developed, funded and accessible to the States (check and answer for whichever of the following scenarios is applicable):

☐

— Connect to the application via AAMVANet

☐

— Develop your own connection to the application

Of the 38 jurisdictions which responded, 36 indicated they would use AAMVANet to connect to SAVE. Jurisdictions were unable to provide separate cost data for the development work necessary to connect to each of the various systems needed to verify eligibility

29. Are any of your jurisdiction's birth records automated?

Of the 39 jurisdictions which responded, 27 jurisdictions have birth records that are either fully or partially automated.

30. If yes, what percent of the records or what is the earliest year that is currently automated?

Of the 11 jurisdictions which responded, reports ranged from 20% to 100% of their birth records being automated. In general, jurisdictions that responded to this question tended to have most, if not all, of their birth records automated. Five reported that all of their birth records are automated.

31. How far back (to what year) does your vital records agency intend to automate?

Of the 28 jurisdictions which responded to this question, 23 plan to automate their birth records back to at least 1935, one to 1936, and the remaining three to 1965 or later.

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32. What is the vital records agency's estimate (year) when automation is complete?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Average Estimated Year to Complete	2010	2009	2008
Number of jurisdictions answering	5	7	2

33. Is your vital records agency funded to accomplish this automation?

Of the 20 jurisdictions which responded, 7 indicated the agencies were funded or planning to be funded.

34. What would be the estimated time and cost for your jurisdiction to integrate on-line EVVER verification, assuming EVVER is fully developed, funded and accessible to the States (check and answer for whichever of the following scenarios is applicable):

- ☐
- Connect to the application via AAMVAnet
- ☐
- Develop your own connection to the application

Of the 36 jurisdictions which responded, all 36 planned to connect to Electronic Verification of Vital Events Records system (EVVER) through AAMVAnet. Jurisdictions were unable to provide separate cost data for the development work necessary to connect to each of the various systems needed to verify eligibility.

35. Does your state currently have any ability to do automated passport verifications with the Department of State?

Of the 40 jurisdictions which responded, only one jurisdiction, independent of Real ID, was planning to begin conducting automated passport verifications with the Department of State.

36. If yes, is this verification via batch or on-line processing?

The one jurisdiction is planning to use on-line processing.

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37. What would be the estimated time and cost for your jurisdiction to integrate on-line Department of State passport verification, assuming a passport verification system is fully developed, funded and accessible to the States (check and answer for whichever of the following scenarios is applicable):

- ☐
— Connect to the application via AAMVAnet
- ☐
— Develop your own connection to the application

Of the 36 jurisdictions which responded, all 36 planned to connect to the Department of State through AAMVAnet. Jurisdictions were unable to provide separate cost data for the development work necessary to connect to each of the various systems needed to verify eligibility

38. What would be the estimated time and cost for your jurisdiction to integrate on-line all-driver verification, assuming an all-driver verification system is fully developed, funded and accessible to the States (check and answer for whichever of the following scenarios is applicable):

- ☐
— Connect to the application via AAMVAnet
- ☐
— Develop your own connection to the application

Of the 39 jurisdictions which responded, all planned to integrate on-line all-driver verification through AAMVAnet. Jurisdictions were unable to provide separate cost data for the development work necessary to connect to each of the various systems needed to verify eligibility.

Address of Principal Residence

2. Does your jurisdiction currently retain an address in the database?

All 40 jurisdictions which responded to the question currently retain an address in the database.

3. Does your jurisdiction currently allow the use of an alternative mailing address?

38 of the 39 jurisdictions which responded to the question currently allow the use of an alternative mailing address.

4. Does your jurisdiction use a standard address protocol (e.g. USPS Postal Addressing Standards)? If so, which?

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30 of the 36 jurisdictions which responded to the question currently use a standard address protocol. Most jurisdictions use software where addresses conform to USPS Postal Addressing Standards.

5. Does your jurisdiction currently allow the “masking” of an address for persons in certain protected classes (e.g. victims of domestic violence, law enforcement or court personnel, etc.)?

25 of the 40 jurisdictions which responded to the question currently allow the “masking” of an address for persons in protected classes.

6. Describe the changes required to your system to comply with the capture and maintenance of the address of principle residence, while allowing the masking of addresses which appear on the license for certain protected classes:

Because data is jurisdiction specific, it is not included in this aggregate report.

What would be the estimated time and cost for your jurisdiction to implement the required changes:

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$18255,550	\$3,076,616	\$1,305,650
Total program hours	15,941	13,124	1,400
Number of jurisdictions answering	11	10	5

Records Retention

7. How many documents per average transaction would you expect to process:
- Full legal name
 - Date of birth
 - Social security number
 - Lawful presence

Because data is jurisdiction specific, it is not included in this aggregate report.

39. Would your jurisdiction plan to save the digital images in a system separate from or integrated with your DL/ID database?

9 jurisdictions plan to save the digital images integrated with the jurisdiction’s DL/ID database. 18 jurisdictions plan to save the digital images separate from the jurisdiction’s DL/ID database.

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40. What are the estimated added costs and time to capture and save the digital images?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$35,499,317	\$72,515,022	\$66,745,874
Total program hours	8,799	37,783	5,948
Number of jurisdictions answering	14	14	12

Photo Capture

41. What are the estimated time and cost for the system changes for your jurisdiction to implement the required changes?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$28,104,432	\$11,614,986	\$13,371,966
Total program hours	8,172	17,590	15,680
Number of jurisdictions answering	16	12	9

Database

42. What are the estimated time and cost for the system changes for your jurisdiction to implement the required changes?

[See aggregate information below.](#)

43. Does your jurisdiction currently have any limitations on the sharing of DL/ID data, driver record and/or photographs with other state licensing agencies?

[Many jurisdictions have at least some restrictions on the sharing of digital images. In addition, both CDLIS and PDPS place limits on the sharing of driver record data with some parties.](#)

44. If so, what legislative changes will be required in order to comply?

[Because data is jurisdiction specific, it is not included in this aggregate report.](#)

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45. What system changes and/or upgrades would be required to comply?

Because data is jurisdiction specific, it is not included in this aggregate report.

46. What are the estimated time and costs for implementation?

- ☐ — Connect to the application via AAMVAnet
- ☐ — Develop your own connection to the application

Of the 31 jurisdictions which responded to this question, 30 plan to connect via AAMVAnet. Jurisdictions were unable to provide separate cost data for the development work necessary for this requirement.

47. What are the estimated time and costs for implementation?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$25,892,659	\$16,396,853	\$5,955,600
Total program hours	9,508	33,760	8,780
Number of jurisdictions answering	15	12	10

48. When was your driver license information system developed or when did it have its last major redesign?

Of the 30 jurisdictions which responded, on average jurisdictions' systems had their last major redesign in 1997.

49. What was the cost of that re-design?

15 jurisdictions redesigned their system in the last 5 years. On average, these jurisdictions invested \$12.4 million each in redesigning these systems.

50. Did your jurisdiction have major driver license system re-designs/upgrades planned independent of REAL ID Act Requirements?

- a. If so, for when?

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Of the 38 jurisdictions which responded to the question, 21 jurisdictions had plans, separate from REAL ID, to redesign or upgrade their driver license system.

b. If so, how much was budgeted for this?

Of the 21 jurisdictions planning redesign or upgrades, only 19 indicated they had funding (\$14.0 million on average)

	Total	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Planned funds to spend on DL system and IT infrastructure between 2006-2011	\$266,387,905	\$53,575,000	\$33,012,905	\$179,800,000

Part Two Business Process Impacts

Certification

51. What is the estimated number of staff hours currently devoted by your jurisdiction to a federal CDL audit?

Currently, on average, jurisdictions plan to spend 571.4 hours on their CDL Audit.

The number of hours for certification ranged from 50 to 5,500. The median was 212.5. Jurisdictions, on average, responded by saying that the Real ID Audit should overlap with 55% of their current CDL Audit Process.

52. What is a ball-park average hourly salary rate of the persons most involved in the federal CDL audit process?

Because data is jurisdiction specific, it is not included in this aggregate report.

53. Based on the above, what is your estimate of the cost of a CDL audit?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$771,599	\$1,037,636	\$772,236
Number of jurisdictions answering	16	16	12

54. Based on common subject matter, what percent of the time involved in the CDL audit would you estimate might be duplicated in a REAL ID compliance audit?

Of the 32 jurisdictions which responded, the average answer was that the REAL ID audit would include 51.4% of the requirements covered by the CDL audit. The percentages ranged from 3% overlap to 100% overlap.

To understand the relative scale of your CDL population compared to all driver's and ID holders:

55. What is the number of Active CDL's in your jurisdiction?

Total number of active commercial driver's licenses in the nation: 12,923,624

56. What is the number of Active Non-CDL's in your jurisdiction?

Total number of active non-commercial driver's licenses in the nation: 207,950,328

57. What is the number of non-driver ID holders' in your jurisdiction?

Total number of active ID cards in the nation: 18,189,261

Lawful Presence Requirements

58. What is the estimated number/percent of non-permanent U.S. residents processed by your jurisdiction?

Because data is jurisdiction specific, it is not included in this aggregate report.

59. Do you anticipate this processing will be possible at all service locations, or limited to a subset of locations?

Of the 39 jurisdictions which responded to this question, 27 indicated that they would process lawful presence requirements at all locations.

60. If the number of locations will be limited, indicate the number of service locations which will and will not have this capability.

Of the 39 jurisdictions which responded to this question, 12 indicated that they would process lawful presence requirements at a subset of all locations rather than at every site.

61. Are there any additional investments your jurisdiction would find necessary to implement these provisions (e.g. bi-lingual staff, forms and materials translation, etc.) as result of REAL ID requirements.

Because data is jurisdiction specific, it is not included in this aggregate report.

Address of Principal Residence

8. Describe the operational changes would your jurisdiction require.

Because data is jurisdiction specific, it is not included in this aggregate report.

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62. What do you estimate the added per transaction processing time would be in minutes and percent?

27 jurisdictions responded. On average, the address of principal residence requirement will average 4.46 minutes added processing time to each transaction.

63. What are the estimated costs and time for implementing the changes?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$45,950,312	\$94,788,304	\$37,150,625
Number of jurisdictions answering	8	8	6

Photo Capture

64. What type of DL/ID's do you currently issue without a photo?

28 jurisdictions indicated they issue DL/IDs without photo to special categories of individuals.

The most common categories were:

- 1) Veterans without photos
- 2) Military personnel
- 3) An individual who was out of state or country and did not have a photo on record in the database.
- 4) Religious objectors.

Other groups of exemptions included:

- 1) Inmates
- 2) Individuals with facial deformities
- 3) Individuals who have learners permits

65. What are the estimated numbers of each type above?

For the 28 jurisdictions which responded to this question the aggregate numbers are:

7,360,985 DLs
2,222 IDs

66. Do you currently capture the photograph at the beginning of the in-take process (e.g., photo is on file even if license/ID not ultimately issued?)

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Of the 37 jurisdictions which responded to the question, 7 jurisdictions currently capture photos in the beginning of the intake process.

67. Describe how your current business practices would have to be revised to meet the mandatory photo capture for each applicant.

Because data is jurisdiction specific, it is not included in this aggregate report.

68. What are the estimated time and cost of the required business process changes (note: related system cost changes are already covered in Part One of the survey)

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$182,496,533	\$7,577,048	\$5,034,450
Number of jurisdictions answering	14	8	6

License Validity

69. What types of credentials currently have validity periods in excess of 8 years?

3 jurisdictions have DL validity periods in excess of 8 years for some or all of their DL population.

10 jurisdictions have ID validity periods in excess of 8 years for some or all of their ID population.

70. What is the estimated number of each type above?

Total number of DL/IDs with a validity period in excess of 8 years is estimated at 70 million.

71. Describe how your current business practices would have to be revised.

Because data is jurisdiction specific, it is not included in this aggregate report.

72. What are the estimate time and costs for your jurisdiction to implement the required changes (not including the one-time re-enrollment covered in a following question)?

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$1,935,867	\$56,446,778	\$88,320,900
Number of jurisdictions answering	7	2	4

These costs were not included in the final results as it is felt that they are already captured by the Re-Enrollment Cost formula.

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73. Does your jurisdiction currently allow a person to hold both a DL and ID concurrently?
If so, how many persons currently hold both credentials?

Of the 34 jurisdictions which responded, 17 currently allow residents to hold both DLs and IDs.

74. If yes, what is the estimated impact and cost if this practice were prohibited?

The impact would be lost revenue for those jurisdictions that allow a person to hold both a DL and an ID card. To accommodate the change, systems and programs would need to be changed. States would have to conduct an education campaign to inform the public about the change. Several jurisdictions would have to amend their statutes that allow residents of other jurisdictions to acquire an ID from their jurisdiction. The cost could not be quantified.

Card Design Specifications

75. What issuance method does your jurisdiction currently use?

- Centralized 16 jurisdictions
- Over-the-Counter 31 jurisdictions

76. If all eight features above were required, would your jurisdiction need to change the above issuance method? If so, describe.

Because data is jurisdiction specific, it is not included in this aggregate report.

77. If yes, what is the estimate and time and costs to convert to the new issuance method:

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$46,072,699	\$262,674,196	\$212,095,625
Number of jurisdictions answering	9	6	4

Employee Background Checks

	Small States	Medium States	Large States
Total cost	\$941,070	\$2,831,037	\$4,094,854
Number of jurisdictions answering	16	16	15

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78. How many of your jurisdiction's employees would be subject to the background check requirements?

35,521 employees from the 40 jurisdictions which responded would be subject to the background check requirements.

79. What is your average annual employee turnover rate?

The average turnover rate is 13.4% based on responses from 38 jurisdictions.

80. Do you currently conduct background checks?

- If so, describe type and scope and frequency
- if so, describe number and type of covered employees
- if so, describe disqualifying offenses

Of the 39 jurisdictions which responded, 34 currently conduct some kind of background check. Most of these are initial checks upon hiring an employee. Only one jurisdiction interviewed currently conducts credit checks.

81. Describe what legal, labor contract, hiring process, etc. changes this would require in your jurisdiction and their impacts (e.g., finding alternative jobs for pre-existing employees who can't pass).

Disqualifying offenses included: theft, assaults, high credit risks, drug and felony convictions, serious traffic convictions and moving violations; outstanding warrants.

82. What is the estimated cost of a federal and state criminal background check in your jurisdiction?

The average cost for a federal and state criminal background check (based on 36 responses) is \$73.07. The costs ranged from \$0 to \$400 per background check. The \$0 reflected that the background check would be conducted by the jurisdiction's Department of Public Safety.

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Average cost	\$85.04	\$75.59	\$60.62
Number of jurisdictions answering	11	12	13

83. What is the estimated cost of a federal and state criminal background and credit history check in your jurisdiction?

The average cost for a federal and state criminal background and credit check (based on 31 responses) was \$86.39. The costs ranged from \$10 to \$500 per background and credit check.

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	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Average cost	\$110.85	\$57.62	\$82.45
Number of jurisdictions answering	10	10	10

84. How many contracts would need to be modified to include the required background checks?

Jurisdictions indicated it would drastically impact their hiring timelines and employee procedures. Many jurisdictions indicated they would need new legislation to require background checks and would need to renegotiate their labor contract. Jurisdictions would need to create criteria to determine pass/fail for credit check tests. Jurisdictions would need to create temporary employee contracts, pending the background check.

85. By applying the costs above to the estimated number of affected contractual employees, or by utilizing a vendor-provided number, what is the estimated cost impact of any new background check provisions for your vendors due to REAL ID?

Based on the 22 jurisdictions which responded, 277 existing contracts would be changed on account of the background check requirement. No cost number can be provided at this point in time.

Physical Security

86. What number of such facilities in your jurisdiction would be affected?

A total of 7,191 facilities would be affected, based on the responses of 35 jurisdictions.

	Issuance Offices	Production Facilities	Storage Facilities
Operated by You	2,453	700	701
Operated by Vendor	202	494	497
Operated by Agents	1,512	81	451

87. For each applicable type above, describe the current measures and costs for protecting physical security (e.g., locks, cameras, guards, hours of coverage, etc.)

Because data is jurisdiction specific, it is not included in this aggregate report.

Fraudulent Document Training

88. What number of employees will require the training?

Based on responses from 38 jurisdictions:

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- Level One : 31,833 employees
- Level Two : 20,824 employees

89. What is your average annual employee turnover rate for this population?

13.7% average based on 37 jurisdiction's responses

- 4,261 average annual new hires needing Level One
- 2,853 average annual new hires needing Level Two

90. What change to your current training practices would be required?

Because data is jurisdiction specific, it is not included in this aggregate report.

91. What percentage of your training do you estimate will be provided?

- In-house
- Via contract on-site
- Via contract off-site
- Via computer-based delivery

Note: AAMVA's current estimate of Level One on-line training is \$100/per student for the computer-based training portion (would likely need to be augmented by on-site, hands-on document review skills)

Because data is jurisdiction specific, it is not included in this aggregate report.

92. What are the estimated additional costs to implement the changes?

- Training delivery
- Employee time away from work
- Facilities
- Equipment
- Materials

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$8,114,911	\$9,281,569	\$15,865,397
Number of jurisdictions answering	16	16	14

93. Describe additional facilities/equipment/resources (e.g. training rooms, computers, contractors, etc.) required to comply with new assumptions.

Because data is jurisdiction specific, it is not included in this aggregate report.

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94. How much elapsed time (in months) will you require to be prepared to meet the training requirements?

Because data is jurisdiction specific, it is not included in this aggregate report.

Re-enrollment

95. How many additional in-person visits do you anticipate over the 5-year period due to the loss of alternative channels (mail, internet, kiosks, etc.)

For all jurisdictions affected a combined: 94,996,403

96. How many additional in-person visits do you anticipate over the 5-year period due to the need to “accelerate” due to your previous renewal cycle being longer than 5 years?

For all jurisdictions affected a combined: 40,236,312

97. What is the answer above, if the assumption above was extended to a re-enrollment period of 8-years (until May, 2016)?

Insufficient data was collected to provide an answer.

98. Estimate the increased DL/ID workload impact on your jurisdiction using the worksheet on the following page.

Because data is jurisdiction specific, it is not included in this aggregate report.

REAL ID In-Person Workload Increase Estimate Calculation Worksheet:

- New full REAL ID enrollment transactions take twice as long as current in-person renewal transactions.
- In-person renewal transactions take twice as long as alternative channel (mail, internet) non-in-person renewal transactions.
- All transactions in the first cycle of REAL ID will be in-person, “new” transactions.
- (Note: There is a cumulative impact on alternative channel renewal transactions making them four times as long (first doubling due to appearing in-person and then doubling again due to becoming a “full” transaction).

	Small jurisdictions	Medium jurisdictions	Large jurisdictions
Total cost	\$608,788,412	\$1,6265,372,379	\$6,282,528,557
Number of jurisdictions answering	16	16	15

99. What number and percentage of your current DL/ID holders were born before 1935 and have held a DL/ID for at least 10 years?

7,277,157 or 2.97% of all DL/ID holders

100. What number and percentage of your current DL/ID holders have held them in your state for longer than 10 years? 16 years?

10 years = 39,161,294 or 15.98% of all DL/ID holders

16 years = 23,441,064 or 9.56% of all DL/ID holders

101. What number and percentage of your current license/ID holders were born prior to 1935? 1945?

Number born before 1935: 15,500,822 or 6.32% of all DL/ID holders

Number born before 1945: 26,838,163 or 10.94% of all DL/ID holders

Legislation:

102. Does your jurisdiction require enabling legislation to implement REAL ID Act requirements? If so, in what areas? What is the earliest this can be accomplished?

29 of the jurisdictions responding stating that they would need additional legislative approval in order to become REAL ID compliant. These were comprised of 9 small, 9 medium, and 10 large jurisdictions.

The most common legislative needs were:

- 1) Requiring lawful presence to be granted a DL/ID. (3)
- 2) Synchronizing the DL/ID expiration date with the end of the stay on the visa document for non-us residents. (6)
- 3) Employee background checks. (3)
- 4) Being able to share information, photos, and signatures from their database with other states. (3)
- 5) Creating a non-conforming license. (3)
- 6) Changing the jurisdiction's DL/ID renewal period and/or putting an expiration date on identification cards to meet the five year time frame. (7)
- 7) Verifying that an applicant has to show proof of residency to be granted a DL/ID. (4)
- 8) Verifying Social Security Number (4)
- 9) Scanning and storing original identity documents for a 10 year period (3)
- 10) Conforming current DL/ID to REAL ID requirements and requiring original identity source documents for individuals already in the jurisdiction database. (4)
- 11) Budget appropriations (3)
- 12) Facility security (3)

Other issues that jurisdictions needed to make legislative and administrative policy changes include:

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- Accessing verification systems
- Full legal name
- Making it a requirement that you need to be a state resident to receive a driver's license (MA)
- Birth record automation and retention
- Retention of source documents for 10 years
- Addressing existing photo exemptions for religious reasons
- Addressing transgender population's gender requirement

103. If funding is not forthcoming from the federal government, in the best case, when would be the earliest you could obtain additional appropriations for the purpose of implementing REAL ID?

Because data is jurisdiction specific, it is not included in this aggregate report.

Other:

104. Are there other significant impacts (either in terms of service quality or expense) that have not been covered in this survey? If so, please describe the issue (including assumptions) and the impact.

Because data is jurisdiction specific, it is not included in this aggregate report.

105. For impact comparison purposes, what is your annual base operating budget for DL/ID functions in your jurisdiction?

Because data is jurisdiction specific, it is not included in this aggregate report.

114. What is the earliest date your jurisdictions could be compliant?
(Allow the critical time path for the estimates in this survey for necessary law/regulations change, business process reengineering, contract changes, employee background checks, new hires, training, procurements, systems redesign, programming and deployment, equipment delivery and installation, etc. etc.)

29 jurisdictions replied:

Expected Completion Date:	Jurisdictions which responded
2007	1
2008	5
2009	7
2010	7
2011	2
2012	2
2013	3
2014	2